

THE CITY OF ALTOONA

AFFIRMATIVE MARKETING POLICIES AND PROCEDURES

STATEMENT OF POLICY

In accordance with the Regulations of the HOME Investment Partnership (HOME) Program, and in furtherance of the City of Altoona's commitment to non-discrimination and equal opportunity in housing, the City of Altoona establishes procedures to affirmatively market units rehabilitated under the HOME Program. These procedures are intended to further the objectives of Title VIII of the Civil Rights Act of 1968, Executive Order 11063, and the City of Altoona's local Fair Housing Resolution.

The City of Altoona believes that individuals of similar economic levels in the same housing market area, should have available to them a like range of housing choices regardless of their race, color, religion, sex, familial status, handicap, and national origin.

The City of Altoona is committed to the goals of affirmative marketing which will be implemented in our HOME Program through a specific set of steps that the City and participating owners will follow. These goals will be reached through the following procedures.

1. Informing the public, potential tenants, and owners about Federal fair housing laws and affirmative marketing policies

Through its Department of Community Development, the City of Altoona will inform the public, potential tenants, and property owners about this policy and fair housing laws. The City of Altoona's Department of Community Development will inform the general public by:

- a. Placing a special news release and advertisements in the Altoona Mirror;
- b. Inform potential tenants by providing information pamphlets on Federal fair housing laws in buildings scheduled for rehabilitation; and
- c. Inform owners by mailing letters to property owners who will participate in the program.

The Department of Community Development will provide the above information as soon as possible after they receive notification the HOME Program has been approved by HUD.

2. Requirements for owners to inform the general renter public about available rehabilitated units

It is the City of Altoona's policy to require substantial steps by project owners to carry out affirmative marketing. Owners should provide for costs associated with these requirements in their planned operating costs and City's subsidy decisions, which by necessity, will take these costs into account. Owners of small properties with limited management staff may seek waivers of these requirements on a case-by-case basis from the City. The City will carry out the following requirements when waivers are given.

If it is feasible to advertise in advance of selecting a tenant, without holding units off the market, participating property owners will be required to make information on the availability of units known through:

- a. Advertisements in the Altoona Mirror, if, the owner ordinarily advertises available rentals in news media;
- b. Notifying the Altoona Housing Authority and Improved Dwellings for Altoona requesting that staff inform applicants on its waiting list about upcoming vacancies.

We will emphasize to owners that to the extent feasible without holding units off the market, they make information about upcoming vacancies to the general public after special outreach efforts are underway (see Procedure 3).

The City of Altoona will require that property owners selected for participation in the program comply with affirmative marketing requirements by means of an agreement which will be applicable for a period of five years. Failure to carry out the agreement could make an owner ineligible to participate in the program with future projects, have steps taken to recapture federal funds which were used in the project, or foreclosure.

3. Special Outreach

In order to inform as well as solicit applications from persons in the housing market who are not likely to apply for units without special outreach, the City of Altoona has established methods property owners must use in order to reach this objective. The landlords shall provide vacancy information to the Department of Community Development who in turn, develop renter listings which will be distributed on a regular basis to minority groups and churches, as well as special needs housing providers in the area.

We will also require that owners begin their special outreach activities immediately upon learning that a vacancy will occur. We have asked that owners request a 30-day notification from tenants intending to move so that special outreach to minorities and special needs individuals can begin before notification to the general public. While owners may not always have early notice from tenants, we hope the 30-day period will be the norm.

4. Recordkeeping

The City of Altoona will require that owners keep records on:

- a. The racial, ethnic, and gender characteristics of tenants and applicants;
- b. Activities they undertake to inform the general renter public, specifically:
 - 1) Copies of advertisements placed in the Altoona Mirror;
 - 2) Dates on which the owner contacted the Altoona Housing Authority and Improved Dwellings for Altoona.

We will also ask property owners to provide us, where possible, the data on how applicants heard about the housing opportunities.

5. Assessment and Corrective Action

The affirmative marketing efforts of property owners will be assessed by the Department of Community Development as follows.

To determine if good faith efforts have been made, examine records we have required owners to maintain on actions they have taken, and compare them with the actions we required them to take. If we find that the required actions have been carried out as specified, we will assume that owners have made good faith efforts to carry out these procedures.

To determine results, assess property owners' affirmative marketing efforts in relation to whether or not persons from the variety of racial and ethnic groups in our area and, in particular, African-Americans have in fact applied for and/or become tenants in the rehabilitated units. If we find they have, we will assume that owners have carried out procedures 2 and 3 effectively.

If the representation of racial/ethnic groups is not broad, we will review the affirmative marketing procedures to determine what changes, if any, might be made to make the affirmative marketing efforts more effective in informing persons in all groups about rental opportunities.

We will also ask property owners, the Altoona Housing Authority and staff of the Department of Community Development for their analysis and suggestions concerning our affirmative marketing practices.

6. Corrective Action

The City of Altoona will take corrective action if we find that any owner fails to carry out the procedures we required or fails to maintain the records on tenants and applicants in

accordance with the HOME Program. If there are problems, we will discuss ways to improve owners' efforts prior to taking corrective actions.

As an initial step, we will require owners with vacancies to notify the Department of Community Development immediately upon learning that a unit will become vacant. We are asking that owners give us this information as close to 30 days prior to the upcoming vacancy as possible. The Department of Community Development Staff will then be able to verify on a "spot check" basis if these owners are following the prescribed procedures.

If an owner continues to fail to meet the affirmative marketing requirements, the City of Altoona, after fair warning and an opportunity to correct identified deficiencies, may disqualify an owner from further participation in future rehabilitation programs administered by the City.