

## HAMILTON COUNTY AFFIRMATIVE MARKETING PLAN

### Statement of Policy:

In accordance with the Regulations of the HOME Program (24 CFR 92.351) and Neighborhood Stabilization Program (73 FR 58330) and in furtherance of Hamilton County's Commitment to non-discrimination and equal opportunity in housing, Hamilton County establishes procedures to affirmatively market units rehabilitated or acquired under the HOME and NSP Programs. These procedures are intended to further the objectives of Title VIII of the Civil Rights Act of 1968, Executive Order 11063, and Hamilton County's local Fair Housing Action Plan.

Hamilton County 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, national origin, disability and familial status.

Hamilton County is committed to the goals of affirmative marketing which will be implemented in our HOME and NSP Programs through a specific set of steps that the County and participating owners will follow. These goals will be reached through the following procedures:

### Informing the public, potential tenants, owners and developers about Federal fair housing laws and affirmative marketing policies:

Through its Department of Community Development, Hamilton County will inform the public, potential tenants, property owners and developers about this policy and fair housing laws.

Hamilton County's Department of Community Development will:

Inform the general public by

- Referencing the County's policy in information related to the HOME and NSP Programs.

Inform potential tenants by

- Providing informational flyers about the HOME and NSP Programs to tenants in buildings scheduled for rehabilitation

Inform owners by

- Mailing letters to property owners who will participate in the programs

Inform developers by

- Requiring use of this policy in the selection of homeowners for their units.

Requirements for owners or developers to inform the general renter or homeownership public about available HOME and NSP assisted units:

It is Hamilton County'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 County's subsidy decision, which by necessity will take these costs into account.

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

- Advertisements in the Cincinnati Herald or Cincinnati Enquirer, if the owner ordinarily advertises available rentals or homes in news media
- Notifying the agency Housing Opportunities Made Equal concerning the availability of rental or homeownership units
- Placing an Equal Housing Opportunity poster in a highly visible location in the building to be rented or sold

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 the three outreach steps identified above.

Hamilton County will require that property owners or developers selected for participation in the program comply with affirmative marketing requirements by means of this Plan which will be applicable for the term of assistance. Failure to carry out the plan could make an owner ineligible to participate in the program with future projects.

Recordkeeping

1. For rehab projects, the racial, ethnic, and gender characteristics of tenants and applicants in the 90 days following rehabilitation as required by the County.
2. Activities they undertake to inform the general renter or homeownership public, specifically;
  - Copies of advertisements (if applicable)
  - Dates on which the owner contacted Housing Opportunities Made Equal

Assessment and Corrective Action

The affirmative marketing efforts of property owners or developers, 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 or developers 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' and developers' affirmative marketing efforts in relation to whether or not persons from the variety of racial and ethnic groups in our area have in fact applied for and/or become tenants or homeowners in the HOME assisted units. If we find they have, we will assume that they have carried out the procedures 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 or homeownership opportunities.

We will also ask property owners, developers, Housing Opportunities Made Equal, and staff of the Department of Community Development for their analysis and suggestions concerning our affirmative market practices.

#### Corrective Action

Hamilton County will take corrective action if we find that an owner or developer fails to carry out the procedures we required or fails to maintain the records on tenants and applicants.

If there are problems we will discuss ways to improve owners' and developers' efforts prior to taking corrective actions.

As an initial step, we will require owners with vacancies to notify the Community Development Department 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 Community Development staff will then be able to verify on the "spot check" basis if these owners are following the prescribed procedures.

If an owner continues to fail to meet the affirmative marketing requirements, Hamilton County, after fair warning and an opportunity to correct identified deficiencies, may disqualify an owner from further participation in future HOME or NSP Programs administered by the County.