

**AFFIRMATIVE MARKETING PLAN
CITY OF IOWA CITY, IOWA
(Revised 8/19)**

1. Purpose

This Affirmative Marketing Plan is designed to conform to the requirements of the U.S. Department of Housing and Urban Development (HUD) published at 24 CFR 570 (Community Development Block Grant – CDBG) and 24 CFR 92 (HOME Investment Partnerships – HOME). The plan sets forth the City of Iowa City’s procedures and requirements for affirmatively marketing housing units assisted with federal funds.

2. General Policy

It is the City’s policy to make available housing options to eligible persons from all socio-economic, racial, ethnic and gender groups in the Iowa City housing market area and affirmatively market housing that is assisted through programs administered by the City. To this end, the City will make efforts to affirmatively market housing units to assure that individuals who normally might not apply because of age, race, color, religion, creed, national origin, gender identity, sex, marital status, disability, sexual orientation, the presence or absence of dependents, familial status or public assistance source of income for housing:

- Know about rental vacancies and opportunities to purchase homes.
- Feel welcome to apply or funds or receive housing assistance.
- Have the opportunity to live in units assisted with public funds.

The City will work with subrecipients to ensure that housing units assisted with federal funds are made available to persons on an equal basis.

3. Outreach to the Public, Owners and Potential Tenants – City Procedures

- a. Media. The City may utilize media to advertise (1) the availability of assistance and (2) the availability of vacant housing units. Press releases will contain the Equal Housing Opportunity slogan and a statement of affirmative marketing policy. Display ads, posters and other published materials will contain the Equal Housing Opportunity logo and slogan.

The following media may be used for display advertising:

- Iowa City Press-Citizen and/or Iowa City Gazette- newspapers
- Local government access channel- cable TV

Press releases from the City are received by all area print and electronic media and may also be found on the City’s website.

- b. Other Means. The City will utilize other appropriate methods to inform the public. This may include personal and written contact with organizations, such as those listed below, encouraging them to make information on the vacant units available to all persons on an equal basis.

- Business organizations- Iowa City Board of Realtors, Iowa City Apartment Owners and Managers Association and local lending institutions.
- University organizations such as the Iowa Memorial Union and other University of Iowa web-based applications.
- Other Organizations- CommUnity, The Housing Fellowship, HACAP, and the Iowa City Housing Authority

The Iowa City Housing Authority will be of particular value in that it serves as the local Public Housing Authority, receives referrals through a network of local human service agencies and maintains a current waiting list of Section 8 eligible rentals. Community Development staff will update the Iowa City Housing Authority annually concerning new CDBG/HOME assisted rental properties.

Meetings of the Housing and Community Development Commission are open to the public and will serve as another forum for announcing the availability of federal assistance and discussing the City's affirmative marketing policy for the program. Other public meetings, as needed, will be scheduled to explain the City's HUD funded programs to local organizations, property owners and tenants and discuss the affirmative marketing policy and requirements of local and federal fair housing laws.

The staff of the Iowa City Human Rights Commission may be called upon to assist in explaining fair housing laws and to review potential housing discrimination practices. In addition, the Iowa City Human Rights office has added a full-time investigator who works with discrimination complaints.

4. Requirements and Procedures for Subrecipients

Property owners who participate in the CDBG and/or HOME programs will be required to comply with the following affirmative marketing practices:

- a. Include the Equal Housing Opportunity logo and slogan or statement in all advertisements for vacant units in local media and printed material.
- b. If a rental office is utilized or operated by the owner, whether on or off premises, display fair housing posters in a conspicuous place.
- c. Provide written assurance to the City that units will be made available to prospective tenants on a non-discriminatory basis.
- d. Maintain records of all efforts to affirmatively market vacant units. For example, copies of newspaper ads and documentation of the owners' contacts with the local business, University and community service organizations and other efforts to publicize the availability of the vacant units.

All HOME agreements shall contain language as required by 24 CFR 92.351.

5. Special Outreach Efforts

If, during the course of administering the CDBG and HOME programs, it is determined that special outreach efforts are needed to attract persons of particular racial, ethnic or gender groups to vacant units, the City may:

- Conduct outreach and contact service organizations, churches and University clubs.
- Notify the business, University and community service organizations listed in Section 3b above of the special outreach needed.
- Assist owners to locate prospective tenants by making referrals from the Iowa City Housing Authority's waiting list and target advertising as needed to expand the list.

The City can require that subrecipients begin their special outreach efforts immediately upon learning that a vacancy will occur. Owners typically request a 30-day notice from current tenants planning to terminate their tenancy so that the outreach efforts can begin before advertising to the general public.

6. Record-keeping Requirements

All records pertaining to affirmative marketing efforts of the City will be maintained by the City in accordance with HUD Regulations. The City will ensure the subrecipients also maintain records to document their affirmative marketing efforts.

The City will maintain records of the following:

- Press releases and newspaper ads.
- Copies of notices and documentation of contacts with the business, University and community service organizations.
- Documentation of monitoring visits with subrecipients.

7. Assessment of Affirmative Marketing Efforts

The City will conduct an annual assessment of the effectiveness of its affirmative marketing efforts for the inclusion in the Consolidated Annual Performance and Evaluation Report to HUD. At a minimum, the assessment will include:

- a. A summary of good faith efforts by the City and participating subrecipients to affirmatively market units.

To determine if good faith efforts have been made, the City will compare information contained on the records to be kept with actions that were taken to carry out affirmative marketing. (See Affirmative Marketing Reporting form).

- b. The results of the affirmative marketing efforts may include age, race, color, religion, creed, national origin, gender identity, sex, marital status, disability, sexual orientation, the presence or absence of dependents, familial status or public assistance source of income occupying assisted housing units. To determine results, the City will examine whether or not persons from a variety of groups and persons with disabilities in the area applied for or became tenants, homebuyers, or received rehab assistance. If it is found that a variety is represented, particularly the targeted groups determined to be in need of outreach, the City would assume the procedures were effective.

If it is determined that a participating subrecipient is not making good faith efforts to affirmatively market housing units, the City will take the following corrective actions:

- a. The City will issue a written notice to the subrecipient stating reasons of non-compliance with the terms of the CDBG and/or HOME agreement and corrective actions (e.g. advertising) which must be taken by the owner within a specified period of time, not to exceed 60 days.
- b. Continued non-compliance within the specified time period and, thereafter, during the term of the CDBG and/or HOME agreement, will result in the City taking legal action to recover 100% of the assistance for the subrecipient's project.

All cases of apparent discriminatory practices by subrecipients will be referred to the Iowa City Human Rights Commission for review and remedial action under the housing provision of the Iowa City Human Rights Ordinance.

8. Public Notice and Review

Copies of this Affirmative Marketing Plan will be made public and available for citizen review, upon request, in the office of the Department of Neighborhood and Development Services.