Affirmative Marketing Plan

NYS HOME Program Compliance
24 CFR §92.351

Purpose

The purpose of this Affirmative Marketing Plan is to ensure that all eligible persons have equal access to housing opportunities made available through the New York State HOME Program. This plan is intended to affirmatively market available housing and housing assistance to all eligible households throughout the program service area without regard to race, color, national origin, religion, sex, familial status, or disability, in accordance with the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act (ADA), Title VI of the Civil Rights Act of 1964, and 24 CFR §92.351.

This plan establishes procedures to ensure that individuals and families who are least likely to apply without special outreach are informed of available housing opportunities and encouraged to apply.

Equal Housing Opportunity Policy

Community Progress, Inc. is committed to providing equal housing opportunities for all eligible applicants. No person shall be excluded from participation in, denied the benefits of, or subjected to discrimination in any HOME-assisted program on the basis of:

- Race
- Color
- National origin
- Religion
- Sex (including sexual orientation and gender identity, where applicable)
- Familial status
- Disability

All advertising and outreach materials will include the Equal Housing Opportunity logo or statement and will comply with all applicable federal and New York State Fair Housing requirements.

Program Service Area

The service area includes all municipalities served by the HOME-assisted program. Marketing efforts will be conducted throughout the service area to ensure that all

eligible households have equal access to information regarding available housing opportunities.

Persons Least Likely to Apply

Based upon demographic information, previous applicant data, and community needs assessments, Community Progress, Inc. has identified the following groups that may be least likely to apply without special outreach:

- Racial and ethnic minority households
- Persons with Limited English Proficiency (LEP)
- Persons with disabilities
- Individuals who are deaf, hard of hearing, blind, or visually impaired
- Families with children where affordable housing shortages exist
- Survivors of domestic violence
- Older adults
- Veterans
- Individuals experiencing or at risk of homelessness
- Residents of underserved rural communities
- Other populations identified through periodic demographic analysis

Community Progress, Inc. will periodically review applicant demographics and local census information to determine whether additional populations require targeted outreach.

Affirmative Marketing Activities

Community Progress, Inc. will undertake the following activities to affirmatively market available housing:

- Publish notices in local newspapers and community publications serving diverse populations.
- Advertise through community organizations serving protected classes.
- Post information on the organization's website and social media platforms.
- Display Equal Housing Opportunity posters in public offices and community locations.
- Distribute brochures and flyers throughout the service area.
- Conduct outreach through public agencies, nonprofit organizations, faith-based organizations, senior centers, libraries, schools, and community health providers.
- Coordinate with organizations serving minority populations, persons with disabilities, veterans, and immigrant communities.

- Participate in community outreach events and housing fairs whenever feasible.

Outreach to Persons Least Likely to Apply

Special outreach efforts may include referrals and partnerships with organizations such as:

- Independent Living Centers
- Offices serving individuals with developmental disabilities
- Mental health agencies
- Veterans service organizations
- Domestic violence service providers
- Community Action Agencies
- Public Housing Authorities
- Rural community organizations
- Food pantries
- Social service agencies
- Workforce development agencies
- Refugee and immigrant assistance organizations
- Organizations serving persons with Limited English Proficiency

These organizations may receive program information and application materials to be encouraged to refer eligible households.

Fair Housing Education

Community Progress, Inc. will educate potential applicants regarding their fair housing rights by:

- Providing Fair Housing information with all application materials.
- Displaying Fair Housing posters in public areas.
- Including Fair Housing statements in all advertisements.
- Informing applicants of reasonable accommodation procedures.
- Providing contact information for Fair Housing enforcement agencies.

Language Access (Limited English Proficiency)

Community Progress, Inc. will take reasonable steps to ensure meaningful access for individuals with Limited English Proficiency by:

- Providing translated marketing materials when appropriate.
- Utilizing interpreter services when needed.
- Translating vital documents when required.

- Working with community organizations that serve non-English-speaking populations.

Accessibility for Persons with Disabilities

Community Progress, Inc. will ensure that persons with disabilities have equal opportunity to participate by:

- Conducting outreach through disability advocacy organizations.
- Providing applications in alternative formats upon request.
- Offering reasonable accommodations throughout the application process.
- Providing effective communication through auxiliary aids and services when requested.
- Ensuring that marketing events and meetings are held in accessible locations.
- Providing accessible electronic communications whenever feasible.

If the HOME-assisted program specifically serves persons with disabilities, marketing efforts will continue to be conducted across all protected classes to ensure equal opportunity regardless of race, color, religion, national origin, sex, or familial status.

Advertising Standards

All advertisements will:

- Include the Equal Housing Opportunity logo or slogan.
- Avoid discriminatory language.
- Describe eligibility requirements consistently.
- Be distributed through media that reaches diverse populations.
- Be made available in accessible formats upon request.

Recordkeeping

Community Progress, Inc. will maintain records documenting affirmative marketing efforts, including:

- Copies of advertisements.
- Flyers and brochures.
- Website and social media postings.
- Lists of outreach organizations contacted.
- Dates and locations of outreach events.
- Referral sources.
- Demographic information on applicants, as permitted by law.
- Requests for language assistance or reasonable accommodations.

These records will be retained in accordance with HOME Program record retention requirements.

Evaluation and Corrective Action

Community Progress, Inc. will evaluate the effectiveness of its Affirmative Marketing Plan annually by reviewing:

- Applicant demographics.
- Referral sources.
- Outreach activities completed.
- Participation among protected classes.
- Community demographic information.
- Waiting list demographics, where applicable.

If the evaluation indicates that one or more protected classes are underrepresented compared to the eligible population within the service area, Community Progress, Inc. may implement corrective actions, which may include:

- Expanding outreach to underserved communities.
- Developing partnerships with additional community organizations.
- Increasing multilingual advertising.
- Increasing advertising in minority media outlets.
- Revising marketing materials.
- Conducting additional community presentations.
- Providing additional staff training on affirmative marketing and fair housing requirements.

The effectiveness of corrective actions will be evaluated during the next annual review, and the Affirmative Marketing Plan will be revised as necessary to improve outreach and ensure compliance with NYS HOME Program requirements.

Responsibility

The Program Director is responsible for implementing this Affirmative Marketing Plan, monitoring compliance, maintaining required records, conducting annual evaluations, and recommending revisions as needed. The Executive Director will oversee the implementation of this action.

This Affirmative Marketing Plan shall remain in effect for all HOME-assisted activities and will be reviewed at least annually or whenever program requirements change.