



# El Paso County, Colorado

## Affirmative Fair Housing Marketing Plan

### Statement of Policy

In furtherance of El Paso County's commitment to non-discrimination and equal opportunity in housing, the County has established procedures to affirmatively market rental and homebuyer projects. The procedures are intended to further the objectives of Title VIII of the Civil Rights Act of 1968 and Executive Order 11063. The 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, familial status, disability/handicap or national origin.

This affirmative marketing policy pertains to the El Paso County Budget and Economic Development Department's housing programs and all Subrecipients/Property Owners requesting/or in receipt of federal assistance for projects containing federally assisted units. Affirmative marketing efforts consist of actions to provide information and otherwise attract eligible persons from all racial, ethnic, and gender groups in the housing market area to the available housing. The County will assess the affirmative marketing efforts to determine its success and will take any necessary corrective actions.

El Paso County is committed to the goals of affirmative marketing that will be implemented in all housing programs through the following procedures.

### Affirmative Marketing Procedures

The County will require Subrecipients/Property Owners of housing projects with assisted units to use affirmative fair housing marketing practices in soliciting renters or buyers, determining their eligibility, and conducting all transactions. Subrecipients/Property Owners must comply with the following procedures for the duration of the applicable compliance period:

- A. A housing discrimination disclaimer clause shall be included in any preliminary and/or full application. (Pledge not to discriminate against applicants based on their race, sex, age, religion, national origin, familial status, or disability/handicap.)
- B. The Equal Opportunity logo or slogan must be used in all ads, brochures, and written communications to owners and potential tenants. Advertising media may include local newspaper, radio, television, housing organizations, brochures, leaflets, or may involve a window sign.
- C. Property Owners must display HUD's fair housing poster in rental/sales offices or other appropriate locations where prospective renters or buyers will frequent.
- D. Property Owners must solicit applications for vacant units from persons in the housing market who are least likely to apply for-assisted housing without the benefit of special outreach efforts.
- E. Reasonable accommodations shall be offered to all disabled persons who request accommodations due to disability at any time.
- F. A continuous outreach program shall be conducted to maintain a well-balanced waiting list that will assure the meeting of the affirmative marketing goal at all times.
- G. Property Owners shall disburse informational flyers in minority neighborhoods about the available housing.
- H. Housing opportunities should be advertised in minority-specific newspapers.
- I. Property Owners shall contact organizations that serve those least likely to apply and utilize any applicable referral programs to attract those least likely to apply.

### Record Keeping

Subrecipients/Property Owners must maintain a file containing documentation of all marketing efforts (copies of newspaper ads, memos of phone calls, copies of letters, etc.). These records must be available for inspection by the El Paso County Budget and Economic Development Department.

Owners must maintain a listing of all tenants residing in each unit as well as a listing of all prospective tenants. A log of community contacts, daily traffic records, and any other record keeping materials must be maintained for inspection. For each housing project records must be retained that reflect marketing boundaries, census tract, type of marketing activity utilized, price or rental ranges, type of housing, number of units and staff experience. Other documentation may be required as directed by the County.

## Appropriate Marketing Sources

Marketing shall include the use of newspapers of general circulation in El Paso County. The Subrecipient/Property Owner will place notices in newspapers, specialized publications, and newsletters to reach potential residents. Applications, notices, and all publications will include a Fair Housing and Equal Opportunity Logo. Community media advertisement of the projects will be through the following local newspapers:

### **Newspapers:**

The Fountain Valley News  
Hispania News  
The Gazette  
Or Other Local Minority Publication

The Subrecipient/Property Owner will contact local civic and community organizations representative of the ethnic and cultural diversity of the area in order to disseminate information about the available housing. Groups representing the handicapped and the elderly shall also be contacted. Community media advertisement of the projects will also be available through the internet and local organizations:

### **Internet:**

El Paso County Website

### **Organizations:**

Lorraine Newman Center  
Fountain Valley Senior Center  
Homeownership Counseling Agencies  
Local Town Halls

Where necessary the Subrecipient/Property Owner shall publish its marketing materials in multiple languages in order to better reach potential applicants in the area with language limitations.

## Assessment and Corrective Actions

The County shall complete a written assessment of the Subrecipient/Property Owner's Affirmative Marketing efforts. The County will assess the affirmative marketing efforts of the owner by comparing predetermined occupancy goals (based upon the area from which potential tenants will come) with actual occupancy data that the Subrecipient/Property Owner is required to maintain. Outreach efforts on the part of the Subrecipient/Property Owner will also be evaluated by reviewing marketing efforts.

Corrective action will be required of the Subrecipient/Property Owner if affirmative marketing requirements are not followed. If, after discussing with the Subrecipient/Property Owner ways to improve procedures, the Subrecipient/Property Owner continues to fail to meet Affirmative Marketing requirements, they will be prohibited from further participation in the County's housing programs.