



Affirmative Marketing Guideline

Recommended Practices for Affirmative Marketing in Affordable Housing

The City of Seattle Office of Housing (OH) achieves affirmative marketing goals to further fair housing in all OH funded projects. This guideline recommends affirmative marketing practices to provide fair access and opportunity to people applying for all types of housing funded by the Office of Housing (OH). It builds on the practices and experiences of housing providers in the City of Seattle and other municipalities.

The guideline is flexible so that affirmative marketing can be tailored to the housing type, location, and meet other funder requirements.

Introduction to Affirmative Marketing

The purpose of affirmative marketing is to affirmatively further fair housing.

Fair and equitable access are central to affirmative marketing. Systematic exclusion in federal and local law and housing policy has historically harmed communities of color and marginalized populations, and these communities continue to face disproportionate inequities today. Affirmative marketing strives to achieve a scenario in which individuals of similar income levels in the same housing market area have a like range of housing choices available to them regardless of their race, color, national origin, religion, sex, disability, or familial status.

The Fair Housing Act prohibits discrimination in housing-related activities for the protected classes, and Washington State and the City of Seattle provide additional protections. Affirmative marketing promotes diverse and inclusive communities by identifying groups that are least likely to apply and by affirmatively marketing to these target groups. Affirmative marketing also ensures that barriers to fair housing choice are identified and analyzed, and appropriate actions to overcome these barriers are identified, implemented, and recorded.

Key elements of affirmative marketing are community engagement and targeted advertising.

Affirmative marketing activities include, but are not limited to, advertising and community outreach that are designed to reach persons who are least likely to apply for the project. Demographic data and community input should inform affirmative marketing plans. Specific strategies to market the buildings vary but include providing marketing materials in formats accessible for persons with disabilities and in languages other than English. Methods of advertising include, but are not limited to, placing advertisements in television programs, radio programs, newspapers, and websites. Community organizations, religious groups, advocacy groups, and community centers also provide opportunities to advertise to those least likely to apply.

Assistance with applications and adjustments to screening processes or criteria also increase access to housing opportunity for least likely to apply groups.

Affirmative marketing is required for all projects funded by the Office of Housing.

OH-funded housing must be affirmatively marketed to groups identified as least likely to apply, as well as the general public. Federally funded projects must also submit an Affirmative Fair Housing Marketing Plan to the Department of Housing and Urban Development. Coordinated Entry for All and other social services systems address fair access to housing in their procedures; therefore, if the project’s funding mandates tenant referrals via these programs, then the owner is not required to prepare an affirmative marketing plan.

In addition, documentation of the affirmative marketing outreach and engagement process must be recorded and retained for future reference and monitoring.

Affirmative Marketing Housing Plan

Project sponsors are encouraged to begin planning for affirmative marketing prior to applying to OH for funding. Many project sponsors, particularly community-based housing development organizations, engage community members early in the development process to assist with project design. Early and consistent community engagement can help sponsors develop project design, build trust with local organizations, and create partnerships and strategies for affirmative marketing.

Project sponsors must submit to OH a draft of their Affirmative Marketing Plan following a funding award and a final Affirmative Marketing Plan prior to leasing or sales. The following lists the components of an Affirmative Marketing Housing Plan. See Attachment A for the full Affirmative Marketing policy objectives and requirements.

Affirmative Marketing Housing Plan Should Include the Following Components

1. *Project location and population focus*
2. *Identify least likely to apply groups needing targeted outreach*
3. *Identifying Community Needs and Marketing Strategies*
4. *Outreach to Culturally Relevant Community-Based Organizations*
5. *Outreach to Seattle Public Schools*
6. *Application procedures and review*
7. *Advertising and marketing*
8. *Other strategies to address barriers and support applicants*

Recommended Practices

A review of state and city guidelines informed the recommendations in this guideline, in addition to input from affordable housing developers and community members. Not all these recommendations are intended to be implemented in every affordable housing development. Project sponsors are encouraged to identify approaches most suited for the project type and location, and to create additional approaches and strategies in consultation with community contacts.

1. Project Location and Population Focus

Review local demographics in comparison to citywide demographics; Determine the project’s location in a High Displacement Risk Area or an Equity Area for Design Review

The project location will inform the approach to affirmative marketing. Sponsors should determine the displacement risk of the community in which the project is located. The Office of Planning and Community Development conducted an Equity Analysis in 2016, resulting in a [Displacement Risk Index and Map](#).

If the project is located in a designated [Equity Area](#) for the purposes of Design Review, then the project sponsor must work with the [Department of Neighborhoods](#) to customize the community outreach conducted for Design Review to meet the needs of historically underrepresented communities. If community contacts are made during Design Review process, then they should be reengaged during the affirmative marketing outreach.

2. Identify Least Likely to Apply for Targeted Outreach

Review citywide and neighborhood demographic data to identify populations least likely to apply for the project, particularly racial groups that are underrepresented in the project neighborhood relative to the city at-large. Demographic data for Census tracts and for Community Reporting Areas, a geography that combines multiple Census tracts, is available online.

For projects in high risk of displacement areas, demographic data collected over time will help identify populations and racial groups that have experienced, or are experiencing, displacement. Affirmative marketing strategies and materials designed to target these identified populations will help sustain a diverse and inclusive community.

Sponsors should also consider other populations, such as seniors, people with disabilities, and families, when determining affordability levels and unit sizes for a building.

3. Identifying Community Needs and Marketing Strategies

Identify opportunities to involve community-based organizations in the affirmative marketing plan

Community contacts should receive clear information about the proposed project, purpose and scope of affirmative marketing. Input should center on strategies that will help potential applicants and least likely to apply populations learn about the housing opportunities. Community organizations can help identify:

- Targeted populations for affirmative marketing based on local information
- Feedback on advertisement format, timing, and location to reach targeted populations
- Translation and/or interpretation needs
- Anticipated barriers that potential applicants may face and mitigation strategies
- Urgent local housing needs, such as anticipated displacement or local homelessness
- Additional partner organizations that may assist with outreach and advertising
- Opportunities for project sponsors to support and compensate community-based organizations for conducting outreach and advertising (i.e., Training on how to complete an application)

4. Outreach to Neighborhood and Culturally Relevant Community-Based Organizations

Engage with community partners

Neighborhood and culturally based organizations, homeless services agencies, lower-wage workforce businesses, and service agencies can advise or assist with outreach to potential tenants. A list of community-based organizations is available at [Department of Neighborhoods](#) and Office of Housing.

If the project is in a high risk of displacement area, affirmative marketing should help marginalized populations stay in their community in order to maintain inclusion. This includes connecting with historically rooted community-based organizations that have ties to existing resident populations or already displaced residents. If the project is in a low or moderate displacement risk area, affirmative marketing should focus on equitable access. This includes connecting with organizations that can help reach potential applicants beyond the immediate area to make the housing opportunity known to population groups who are otherwise unlikely to apply.

Schools are also an integral part of any city and community. Many families depend on the support resources and relationships that their neighborhood school provides. Engagement with the local schools could help families feeling the pressure of displacement or who have already been displaced become aware of the upcoming housing opportunity. Sponsors should identify the schools nearest to the project using this [webpage](#). Specific school administration contact information can be found [here](#).

5. Application Procedures and Review

Describe application process and how it supports fair access

A key decision is how to accept applications from potential renters and buyers, as affordable housing projects typically experience high levels of interest and demand. The application process should not disadvantage people with limited English language skills, limited or no access to a computer, limited ability to apply in person, or an inflexible schedule such that they are unable to apply at a specific time.

For rental projects, a common lease up procedure is first come, first served, in which a list of applicants is created based on when the completed application is received. Lease up can also be done through a lottery. In a lottery, applications are accepted during a specified time period, and are then randomized to create a list of applicants.

Sponsors can decide to incorporate a community preference in rental and homeownership projects that are located in designated high-risk of displacement areas. Sponsors should refer to the Community Preference Guideline.

Project sponsors of rental projects can decide to create and maintain a wait list for unit turnover. A list of interested applicants could be established after the building is fully leased and occupied. The wait list is used to fill any future vacancies and may need to be periodically updated. Federally funded projects are required to maintain a wait list.

Describe how the impact of affirmative marketing will be evaluated

After leasing or home sales, the demographic mix of the residents should be reviewed to assess the impact of affirmative marketing. Reviewing demographic and other information about applicants can also benefit the ongoing marketing of the building. Information that may be collected through voluntary surveys of applicants or residents includes:

- Race and ethnicity
- How the applicant learned about the housing

- Location of current and previous residences and/or workplaces, and if they are/were located in a displacement risk area
- Connections to local organizations or services, including culturally relevant services
- If the applicant was formerly displaced from the community

6. Advertising and Marketing

List culturally specific media, organizations, community events, businesses and services locations to be used for targeted advertising; Identify materials to be translated and selected languages/formats

Online advertising through the project sponsor website, leasing/sales websites, online community forums and marketplaces, and social media pages are valuable, but may put some applicants at a disadvantage. Additional approaches should be used to reach those identified for affirmative marketing. Some common approaches are:

- Translate materials into appropriate languages and formats
- Advertise in community and commercial spaces and community institutions
- Advertise in local and regional media that serve targeted populations
- Distribute notices to Seattle Housing Authority and community-based organizations
- Attend community events and help prospective applicants' complete applications
- Use photos or images with diverse people in advertising materials
- Include Fair Housing statement and/or logo

Information about affordable housing opportunities should be broadly accessible even after leasing or sales are completed. Approaches include:

- Information about all residential properties and how to apply on the project sponsor website available in multiple languages/formats
- Information about vacancies and application process at the building site
- Use [Housing Connector](#) to list vacancies
- Annual communication with community contacts about housing opportunities, tenant eligibility, waitlists, and how to learn about vacancies
- Continued relationships with community organizations that can support residents
- Best practices shared and used to inform future outreach and engagement

7. Other Strategies to Address Barriers and Support Applicants

Describe other strategies to be used such as training and/or support for community partners that assist with marketing, outreach, and applications; assistance with completing applications; voluntary referral agreements with services organizations; and flexible or revised screening criteria

Applicants who are members of protected classes frequently have barriers to accessing housing due to poverty, immigration status, and discrimination. Application process and screening criteria that address barriers can make affirmative marketing more successful. Examples include:

- Provide training to community partners who can assist people complete applications
- Provide information on required documentation for selection as early as possible
- Allow alternative documentation for income, credit, and rental history
- Allow for a flexible low-mid range score for credit to meet the criteria
- Adjust for medical and student loan debt when reviewing debt to income

- Allow applicants to seek an individualized assessment prior to lease up
- Revise screening criteria related to past evictions to allow for missed rent payments due to low income and/or extenuating circumstance if there is no other negative tenant history

Supportive Housing units may be set-aside for referrals from partner organizations that will provide services to the residents. A Memorandum of Understanding with the referring organization should define resident eligibility, the referral process, and supportive services. The referring organization must serve eligible clients in a non-discriminatory manner. Examples include:

- Homelessness service agencies who place clients in housing can often assist clients with applications, help pay move-in costs, provide stability services, and occasionally provide rent assistance for six to twelve months.
- Agencies serving people with disabilities may also be able to provide move-in and ongoing assistance

Attachment A – OH Affirmative Marketing Policy [PROPOSED]

Owners are required to affirmatively market affordable rental and homeownership housing, and take proactive steps to promote fair access and equal opportunity so that individuals of similar economic levels in the same housing market area have a range of housing choices regardless of their race, color, religion, sex, national origin, familial status, disability, or other protected class status. Project sponsors must submit a draft Affirmative Marketing Plan following a funding award for a rental or homeownership development, and a final Affirmative Marketing Plan prior to leasing or sales. Owners will be required to maintain records of their affirmative marketing efforts.

The objectives of the affirmative marketing policy are:

- Promote robust, effective affirmative marketing to ensure fair access to affordable housing opportunities for diverse racial and ethnic communities and other protected classes, consistent with local, state, and federal fair housing laws
- Sustain and foster integrated, inclusive communities through effective outreach and advertising of affordable housing opportunities
- Encourage early engagement with local organizations in low-income communities of color that are at high risk of displacement to help address historical housing discrimination and prevent displacement of current residents
- Increase opportunities for people experiencing homelessness, who are disproportionately people of color, people with disabilities, LGBTQ individuals, and others who face barriers to housing, through voluntary agreements with service providers for set-aside units and through affirmative marketing of non-set-aside housing units
- Promote communications and referral relationships so that accessible units are available to people with physical disabilities and units with multiple bedrooms are available to families with children

Applicants are encouraged to consult with OH early in project planning about community-based organizations and resources that may be part of an affirmative marketing effort. An Affirmative Marketing Plan must include the following:

1. **Project location and populations needing targeted outreach.** Analysis of the demographic make-up of the local area in comparison to citywide demographics. Determination of whether of the proposed project location is in an area designated as high risk of displacement in the [Displacement Risk Index](#) or an [Equity Area](#) for the purposes of Design Review.¹ Identification of groups to receive targeted outreach to provide awareness and access to housing.
2. **Outreach to community-based organizations.** Description of completed and planned outreach to specific organizations. Description of efforts to seek input and, as appropriate, assistance with marketing from organizations serving populations needing targeted outreach.
3. **Lease up or sales procedures.** Description of application process and how procedures provide fair access, including to populations identified for targeted outreach. Description of how demographic and other information will be used to assess the impact of affirmative marketing efforts.
4. **Advertising and marketing.** Description of planned marketing such as working with community-based partner organizations, nearby schools, and social services agencies; targeting advertising such as local and culturally specific media; marketing through local employers with low-wage workforce; distributing materials at local and culturally specific events and locations; translating materials.
5. **Other strategies to address barriers and support applicants.** May include training and other support to community partners assisting with marketing, assistance with completing applications, voluntary referral agreements with organizations serving disadvantaged groups, and flexible screening criteria.

¹ Seattle Department of Construction & Inspection GIS, Retrieved from <http://seattlecitygis.maps.arcgis.com/apps/webappviewer/index.html?id=f822b2c6498c4163b0cf908e2241e9c2>