

## Affirmative Fair Housing Marketing Plan (FORM AA-5)

<b>Applicant Name:</b> _____	
<b>Project Name:</b> _____	
<b>1. INTRODUCTION</b>	
<p>DOH and CHFA are legislatively mandated under Section 8-37ee of the Connecticut General Statutes and the Connecticut Fair Housing Act, 46a-64b et seq. to promote fair housing choice and racial and economic integration in all housing funded in whole or in part by the state of Connecticut. Further, owners of state assisted housing are responsible for including in their Affirmative Fair Housing Marketing Plan provisions for the recruitment of an applicant pool that includes residents of municipalities of relatively high populations of those that would be least likely to apply. These groups include White (Non-Hispanic) and members of minority groups: Blacks (Non-Hispanic), American Indians/Alaskan Natives, Hispanics and Asian/Pacific Islanders in the Metropolitan Statistical Area (MSA) or housing market area who may be subject to housing discrimination. At least 20 percent of the units must be targeted to the group(s) identified as "least likely to apply." Groups "least likely to apply" include people with disabilities and families with children.</p>	
<b>2. APPLICATION AND PROJECT IDENTIFICATION</b>	
<b>A. Applicant Information</b>	<b>B. Project or Application Number:</b>
Name:	Number of Units:
Address (City, State & Zip Code):	Price or Rental Range of Units From \$        To \$
Telephone #:	
<b>C. Project Information</b>	<b>D. Date of Initial Occupancy</b>
Name of Project	Approximate Starting Dates
Address (City, State & Zip Code)	Advertising:            Occupancy:
County:	<b>E. Managing/Sales Agent Name:</b>
Census Tract:	Managing/Sales Agent Address: (City, State & Zip Code)

F. Housing or Expanded Housing Market Area

**3. DETERMINING TYPE OF AFFIRMATIVE MARKETING PLAN**

A. Indicate type of Project:  Project Plan  Scattered site units

**4. DIRECTION OF MARKETING ACTIVITY**

A. Complete Worksheet 1 (attached) to determine who is least likely to apply.

B. Indicate below which group(s) in the housing market area are least likely to apply for the housing because of its location and other factors without special outreach efforts.

White (non-Hispanic);  Black Non-Hispanic;  American Indian or Alaskan natives;  Hispanic;  Asian or Pacific Islander;  People with disabilities;  Families with children (See instructions if this is elderly or elderly/disabled housing)

**5. MARKETING PROGRAM**

**A. COMMERCIAL MEDIA**

Check the media to be used to advertise the availability of this housing.

Newspaper(s)/Publication(s)  Radio  TV  Web-based ads  
 Other (specify)

NAME OF COMMERCIAL MEDIA OUTLET(1)	RACIAL/ETHNIC IDENTIFICATION OF READERS/AUDIENCE (2)	SIZE/DURATION OF ADVERTISING (3)	MEDIA TARGETED TO PEOPLE WITH DISABILITIES/FAMILIES WITH CHILDREN (4)

**B. BROCHURE, SIGNS, AND FAIR HOUSING POSTER:**

(1) Will brochures, leaflets, or handouts be used to advertise?  Yes  No  
If yes, attach a copy and a list of where the brochures, leaflets or handouts are distributed.

(2) For project sign; Indicate sign size \_\_\_\_\_  
Attach a photograph of project sign.

(3) Fair Housing Posters which include both state and federally protected classes must be conspicuously displayed whenever sales/rentals and showings take place.

Where will they be displayed?  Sales/Rental Office(s);  Real Estate Office(s);  Model Unit(s);  Other \_\_\_\_\_

**C. COMMUNITY CONTACTS**

To further inform the group(s) least likely to apply about the availability of the housing, the applicant agrees to establish and maintain contact with the groups/organizations listed below that are located in the housing market area of SMSA. If more space is needed, attach an additional sheet. Notify DOH of any changes in this list. Attach a copy of correspondence to be mailed to these groups/organizations. (Provide all requested information).

Name of Group/Organization (1)	Group Identification (2)	Approximate Date of Contact or Proposed Contact (3)	Person Contacted or To Be Contacted (4)
Address & Telephone # (5)	Method of Contact (6)	Indicate how organization will assist in implementing the marketing programs (7)	

**6. ANTICIPATED OCCUPANCY/RESULTS**

State in number of units the racial/ethnic mix of occupants anticipated as a result of the implementation of this affirmative marketing plan.

White (non-Hispanic);  Black Non-Hispanic;  American Indian or Alaskan natives;  Hispanic;  Asian or Pacific Islander;  People with disabilities;  Families with children (See instructions for Block 4B if this is elderly or elderly/disabled housing);

**7. EVALUATION OF MARKETING ACTIVITIES**

Explain the evaluation process you will use to determine whether your marketing activities have been successful in attracting the group(s) least likely to apply, how often you will make this determination, and how you will make decisions about future marketing based on the evaluation process. Attach as Exhibit AA-5 #7.

## 8. EXPERIENCE AND STAFF INSTRUCTIONS

### A. Staff training and Assessment:

- 1) Has staff been trained on the use of this AFHMP?       Yes       No
  
- 2) Is there ongoing training on the use of this AFHMP and the fair housing laws?  
 Yes                       No
  
- 3) If yes, who provides it?
  
- 4) Do you periodically assess staff skills, including their understanding of the use of this AFHMP and their responsibilities when using it?       Yes       No
  
- 5) If yes, how and how often?
  
- 6) Has staff been trained on tenant selection or the program requirements for homeownership units or homeownership assistance in accordance with the project's policies?       Yes                       No
  
- 7) What staff positions are/will be responsible for determining eligibility for rental units, homeownership or rehab assistance?

## 9. ADDITIONAL CONSIDERATIONS (To be submitted by housing operator, if different from applicant)

- A.      Submit a Fair Housing Policy Statement.
- B.      Submit a list of fair housing trainings attended by staff.
- C.      Submit an Affirmative Action Policy Statement.
- D.      Submit an ADA Grievance Procedure.
- E.      Submit an ADA Notice.
- F.      Submit eligibility requirements for the program or project.

**10. SIGNATURES (By signing this form, the applicant agrees, after appropriate consultation with DOH to change any part of the AFHMP covering a multifamily project to assure continued compliance with the CT Fair Housing Regulations).**

**Signature of Person Submitting Plan:**

**Name (Type or Print):**

**Title and Company:**

**Date:**

**Signature of Project Operator/Manager:**

**Name (Type or Print):**

**Title and Company:**

**Date:**

<b>**FOR AGENCY USE ONLY**</b>	
Approved by:	Disapproved by:
Signature:	Signature:
Name:	Name:
Title:	Title
Date:	Date:

**FORM AA5 Instructions**  
**DOH Affirmative Fair Housing Marketing Plan**

**Part 1 - Introduction**

DOH and CHFA are legislatively mandated under Section 8-37ee of the Connecticut General Statutes and the Connecticut Fair Housing Act, 46a-64b et seq. to promote fair housing choice and racial and economic integration in all housing funded in whole or in part by the state of Connecticut. Further, owners of state assisted housing are responsible for including in their Affirmative Fair Housing Marketing Plan provisions for the recruitment of an applicant pool that includes residents of municipalities of relatively high populations of those that would be least likely to apply. These groups include White (Non-Hispanic) and members of minority groups: Blacks (Non-Hispanic), American Indians/Alaskan Natives, Hispanics and Asian/Pacific Islanders in the Metropolitan Statistical Area (MSA) or housing market area who may be subject to housing discrimination. At least 20 percent of the units must be targeted to the group(s) identified as “least likely to apply.” Groups “least likely to apply” include people with disabilities and families with children.

**In addition, even though housing providers and developers are not required to market to all protected classes, all participants must not discriminate based on race, color, religion, sex, national origin, ancestry, sexual orientation, creed, marital status, learning disability, mental or physical disability, including but not limited to blindness, age, family status, marital status, sexual orientation, age, lawful source of income, or gender identity or expression.**

The applicant shall describe on this form the activities it proposes to carry out during marketing, and, where applicable, the initial sales, application, or rent-up period. The marketing program should also assure that any group(s) of person normally NOT likely to apply for the housing without special outreach efforts (because of existing neighborhood racial or ethnic patterns, location of housing in the Primary Metropolitan Statistical Area, price or other factors), know about the housing, feel welcome to apply and have the opportunity to buy, rent, or apply for rehabilitation funds. In addition to the specific advertising activities, please describe activities relating to instructions and or training that is provided to staff on fair housing.

Marketing activities are required throughout the life of the mortgage, assistance agreement or regulatory agreement - whichever is longer. The AFHMP must be available for public inspection.

In filling out this form, in addition to these instructions, recipients should use the following for guidance:

1. Conn. Agencies Regs. §§8-37ee-1 – 17 and 300 –314;

2. HUD's Multifamily Asset Management and Project Servicing Handbook--4350.3 Rev. 1, Change 2 for additional assistance with tenant selection policies.

## **Introduction**

The AA-5 is to be used to market the following types housing for which an entity receives financial assistance:

- rental units--rental projects of five or more units or five or more scattered site rental units;
- Homeownership units—five or more units for sale in a subdivision or scattered site receiving development assistance; and
- Homeownership assistance—assistance to purchase (DPA or other) or rehabilitate homeownership units.

## **Part 2 - Application and Project Identification**

**2A**—For all proposed projects, the applicant is the name of the entity applying for or receiving the financial assistance. The address is the telephone number, address, city, state, and zip code of the entity applying for or receiving the housing assistance.

**2B**—The Project or Application Number is the project or application number assigned by DOH or the entity providing the financial assistance. If this is a new project or application, the project or application number is TBD or to be decided.

Price or Rental Range of Units—For rental units, put in the total rent to be charged for the units including the rent paid by the tenant and the amount of the housing subsidy. If the application is for homeownership units, put in the range of home sales prices. For homeownership assistance, write the minimum and maximum amount of assistance that may be available under the program

**2C**—This portion of the AA-5 asks for information about the project or program applying for financial assistance. For example, the name of the entity making the application is the Town of Wallingford even though the Town will be sub-contracting with a subsidized housing provider to use the money to rehab existing rental units. Include the address, county and census tract where the project is located.

**2D**—For rental units or homeownership units, the applicants/recipients must state the date of initial occupancy of the project. If this is an initial AFHMP, specify the date initial occupancy is projected to begin. Under “Approximate Starting Dates,” state the date advertising is scheduled to begin to groups targeted for special outreach followed by the approximate date on which applicants will be notified of their acceptance or placement on the waiting list. If this is an annual AFHMP or updated AFHMP, fill in the date the project was first occupied under “Initial Occupancy.” Advertising must begin at least 90 days prior to occupancy or prior to a waiting list opening.

For homeownership assistance, include information on the approximate starting date of the advertising the availability of the housing assistance. Advertising must begin at least 90 days prior to the date the funds will be available. Do not fill out the portion of 2D which requests information on the approximate starting date of occupancy.

**2E**—This box is to be completed only if the applicant/recipient is not going to be implementing the AFHMP or the applicant/recipient will not be managing the units.

**2F**—Part F asks the applicant/recipient to identify the housing market area or the expanded housing market area. All applicants for financial assistance for rental units or homeownership units must complete the section asking for a housing market area. A **housing market area** is the area (not necessarily the census tract, but the entire geographic area) from which the owner or manager of the project may reasonably expect to draw a substantial number of its applicants. If a housing market area is not demographically diverse in terms of race, color, national origin, religion, sex, disability, or familial status, an **expanded housing market area** must be used. An expanded housing market area is a larger geographic area that may provide additional diversity. Respondents should indicate the housing or expanded housing market area in which the housing is/will be located, e.g., “City of \_\_\_\_\_” for housing market area, or “City of \_\_\_\_\_” and “County of \_\_\_\_\_” for expanded housing market area.

For homeownership assistance, the housing market area is the entire town or municipality or region, if applicable, applying for the financial assistance. An expanded housing marketing area does not have to be used for homeownership assistance if the program is limited to one town as may be the case in the Small Cities Program.

### **Part 3 – Determining Type of Affirmative Marketing Plan**

**3A**—Applicants for rental or homeownership units in a subdivision should check that this is a project plan. Applicants for rental units, homeownership units, homeownership assistance that are not in a subdivision should check that this is scattered site units. Applicants for homeownership units or homeownership assistance are to submit individual annual plans based on the racial composition of each census tract where the housing will be built. For example, if a builder plans to construct units in minority and non-minority census tracts, separate plans shall be submitted.

### **Part 4 - Direction of Marketing Activity**

**Block 4a**– Complete Worksheet 1 in accordance with instructions.

**Block 4b**– Using the information from the completed Worksheet 1, respondents should identify the demographic group(s) least likely to apply for the housing without special outreach efforts by checking all that apply by identifying which groups. Those “least likely to apply” typically will be those groups with the smallest presence in the housing project, census tract, housing market area or expanded housing market area.



If this is a project built or created for the elderly or the project is built for the elderly and disabled, the complex does not have to market to families with children so long as the complex complies with one of the following:

1. The complex is solely occupied by persons sixty-two years of age or older; or
2. The complex has 80% of its units occupied by persons fifty-five years of age or older.

## **Part 5 - Marketing Program**

The applicant shall describe the marketing program to be used to attract all segments of the eligible population, especially those groups designated in Part 4 of the Plan as “least likely to apply.” Marketing must include the dissemination of information to the largest city located in the nearest Primary Metropolitan Statistical Area, Regional Planning Area and any other area likely to contain high percentages of members of the group identified as least likely to apply and where public transportation or public highways/job availability make it likely that members of these groups will wish to move.

**5A**—The applicant shall state: the type of media to be used: the name of newspapers; call letters of radio or TV stations; the identity of the circulation or audience of the media identified in the AFHMP, e.g., White (Non-Hispanic), Black (Non-Hispanic), Hispanic, Asian-American/Pacific Islander, American Indian/Alaskan Native, persons with disabilities, and families with children; and the size or duration of newspaper advertising or length and frequency of broadcast advertising. Advertisements in newspapers must be displayed or appear where they are most likely to be read or seen - not only in the classified section. In addition, all advertisements must be placed on [www.cthousingsearch.org](http://www.cthousingsearch.org).

**5B**—All brochures, signs, and advertisements must include the U.S. Department of Housing and Urban Development approved Fair Housing logo or slogan or statement and all advertising depicting persons shall depict persons of majority and minority groups. Fair housing posters which include both state and federally protected classes must be placed at the project site and rental offices. Contact more than three commercial media outlets. Use additional sheets as necessary.

**5C**—Community contacts should include individuals or organizations that are well known in the project area or the locality and that can inform people within groups considered “least likely to apply.” Such contacts may include, but need not be limited to: neighborhood, minority and women’s agencies, social clubs, homeless shelters, social service agencies, health clinics, religious groups, legal services, and individuals who are connected with these organizations and/or are well known in the market area or expanded housing market area. There must be an effort to identify and contact several individuals and organizations associated with the group least likely to apply, not just one or two groups and use additional sheets to report on this as necessary. A sample community contact letter is attached.

The applicant shall send a notification to all housing market area community resource contacts at the start of construction or at least 90 days prior to the opening of the waiting list or to the date the funds will be available. This notification shall include: (i) basic information concerning the Project (e.g., number of units, approximate date of occupancy, income levels to be served), (ii) information that they are being contacted because they may be interested in participating in the applicant affirmative marketing efforts, and (iii) advice that they will be contacted later concerning their desire to participate in this effort. The notice shall also provide the name of a person to contact for further information.

The applicant shall send a second notification to its community resource contacts at approximately 50 percent of completion of construction. This notification shall contain: (i) an update on the notification provided in the first notification, (ii) a proposed report on the Project, and (iii) a narrative concerning the Project (e.g., rent levels amenities, availability of transportation).

Six weeks before the estimated beginning of leasing, sales, or the availability of funds for homeownership assistance, the applicant shall send a third notification to all community resource that have been identified as possibly helpful in the affirmative marketing efforts (not necessarily limited to those contacts that have played an active role). This notification shall include: (i) a copy of any sales or rent-up brochure for the Project, (ii) the precise dates for sales or rent-up, (iii) a brief description of how an applicant may apply for the housing and (iv) the name of a person to contact for further information. A description of the selection criteria and selection process must also be included in this letter.

The applicant must solicit eligible applicants who may be referred to them by groups or organizations in the community.

Applicants must submit a Notification of Intent to begin marketing to the department, no later than 90 days prior to engaging in sales or rental or marketing activities.

Where relevant, information may be provided in both English and Spanish.

The AFHMP shall provide for follow up from outreach agencies to determine the effectiveness of referrals (via letter).

## **Part 6 - Anticipated Occupancy/Results**

Anticipated occupancy results are a measure of the effectiveness of the implementation of the AFHMP. If the applicant elects to use indicators of effectiveness that differ from those described in this plan, such indicators shall be described at the bottom of the second page. Such indicators should be used to assess the effectiveness of specific aspects of the affirmative marketing program to attract to the housing persons targeted for special outreach, e.g., media advertising, use of minority-owned media, community contacts, etc.

The description should include a brief statement of the method to be used (e.g., survey of applicant, tenant questionnaire or the like).

### **Part 7 – Evaluation of Marketing Activities**

Respondents should explain the evaluation process to be used to determine if they have been successful in attracting those groups identified as least likely to apply. Respondents should also explain how they will make decisions about future marketing activities based on the Evaluations.

### **Part 8 - Experience and Staff Instructions**

**8(1)**—Staff must be trained on the use of this AFHMP, not the use or creation of an AFHMP, in general. If the staff has not been trained on the use of this AFHMP, please explain why there has been no training and indicate when and what future trainings are planned.

**8(2 - 5)**--Guidance to staff must include information regarding Section 8-37ee-1 –17 and Section 8-37ee-300-314, federal, state, and local fair housing laws and the use of this AFHMP. Copies of any written materials should be submitted with the plan, if such materials are available.

**8(6 – 7)**—Staff must be trained on the use of the eligibility requirements for the projects for which the entity is receiving financial assistance, not on the eligibility under fair housing or state and federal public housing rules in general.

### **Part 9 - Additional Considerations**

#### **Fair Housing Policy Statement, Affirmative Action Policy Statement, ADA Grievance Procedure, and ADA Notice**

In this section, the housing operator, if a different entity than the applicant, must provide a Fair Housing Policy Statement, Affirmative Action Policy Statement, ADA Grievance Procedure, and ADA Notice and the Tenant Selection Plan which must be posted at the housing project at all times where members of the public can view them. They must also be disseminated to staff engaged in the sale or rental of properties and posted wherever applications available to the public. A list of fair housing trainings attended by staff must also be submitted with this Plan.

#### **Eligibility requirements for the program or project**

For guidance on how to develop a tenant selection methodology or other eligibility criteria for the project, applicants/recipients should begin by consulting Conn. Agencies Regs. §8-37ee-304 and HUD's Occupancy Requirements of Subsidized Multifamily Housing Programs Handbook--4350.3 Rev. 1, Change 2.

Pursuant to §8-37ee-304(b) and (c) applicants may use a point system or random selection for rental units. If applicants/recipients are using a point system, they must use the one set out in §8-37ee-304(b) unless the applicant/recipient applies for and receives approval from the department that the proposed system does not violate the intent of the AFHMP and the fair housing laws.

### **Part 10 – Signatures**

Both the applicant for the funds and the housing provider or housing manager must sign the AFHMP at the bottom and date it. Both the applicant for the funds and the housing provider or housing manager assume full responsibility for its implementation. DOH may at any time monitor the implementation of the AFHMP and request modifications in its format or content, where the department deems necessary.

### **Other Requirements**

#### **Application Process:**

The application period for all prospective applicants shall extend for at least 90 days prior to the start date of accepting applications. An application deadline must be established.

Anyone seeking to apply must be able to do so, and assistance must be provided to anyone who requests help with completing the form.

Applications must be stamped, and each person must be given a receipt with the date and time the application was received.

Tenant selection shall occur at least 30 days before occupancy.

**Records:**

Initial AFHMP records, including the implementation of the Plan, must be maintained for at least three years. Thereafter this Plan must remain in full force and effect throughout the remainder of the affordability period of the housing for which it was designed. Revisions to the Plan may be made with DOH approval.

**Reporting Requirements:**

For the initial marketing, three reports regarding racial and economic integration shall be submitted to the DOH prior to final occupancy. One after the period for submission of applications, one after pre-screening, and one after final selection. DOH will determine whether or not the recipient has made a good faith effort in trying to reach members of groups identified as “least likely to apply”. In such cases where these efforts are determined to be insufficient, additional outreach efforts will be required. Such additional outreach efforts may delay the occupancy of units.

Once the project is in occupancy, recipients are required to collect racial and economic data from both tenants and persons on the waiting list. This information must be reported to DOH annually, before October thirty-first for the year ending the preceding September thirtieth. The data shall include information for households entering the development and in occupancy during the previous September thirtieth and shall contain the current percentages of those “least likely to apply” that are residing in the project and are on the waiting list. Additionally, you must submit an evaluation of whether your marketing activities for that year, if any, were effective in attracting least likely to apply applicants. If found ineffective, then you must state how you will make changes in your strategies for future marketing efforts.

**Worksheet 1: Determining Demographic Groups Least Likely to Apply for Housing Opportunities (See AFHMP Block 4A)**

In the respective columns below indicate the percentage of each demographic group for the project (if occupied), waiting list (for existing projects), census tract, housing market area, and expanded housing market area (if the latter is needed to create a more diverse housing market area in terms of race, color, national origin, religion, sex, disability, or familial status).

Wherever possible, statistics should be obtained from a local planning office, Community Development Block Grant Consolidated Plan, or another official source such as the U.S. Census Bureau (please see <http://quickfacts.census.gov/qfd/states/09000.html>).

If there is a significant under-representation of any demographic group in the project and/or on its waiting list relative to the surrounding housing market area, then those groups(s) that are under-represented will be considered “least likely to apply” without targeted outreach and marketing, and will be so identified in Block 4b of the AFHMP. See Part 4 of the AA-5 Instructions for further guidance.

**Attach maps showing both the Housing Market Area and Expanded Housing Market Area.**

<b>Demographic Characteristics</b>	<b>Column 1</b>	<b>Column 2</b>	<b>Column 3</b>	<b>Column 4</b>	<b>Column 5</b>
	<b>Project %</b> (If this is an initial AFHMP, skip this column)	<b>Waiting List %</b> (If this is an initial AFHMP, skip this column)	<b>Census Tract %</b>	<b>Housing Market Area %</b>	<b>Expanded Housing Market Area % (if used);</b>
White					
American Indian or Alaskan Native					
Asian					
Black of African-American					
Native Hawaiian or Other Pacific Islander					
Hispanic or Latino					
Persons with disabilities					
Families with children					
Other					

## **Instructions for Completing Worksheet 1**

Wherever possible, demographic statistics should be obtained from a local planning office, Community Development Block Grant Consolidated Plan, or another official source such as American Fact Finder which can be found on the [www.census.gov](http://www.census.gov) website at <http://quickfacts.census.gov/qfd/states/09000.html>

“Least likely to apply” means that there is an identifiable presence of a specific demographic group in the housing market area, but members of that group are not likely to apply for the housing without targeted outreach, including marketing materials in other languages for limited English proficient individuals, and alternative formats for persons with disabilities. Reasons for not applying can include, but are not limited to, insufficient information about housing opportunities, language barriers, or transportation impediments. If there is no identifiable presence of a specific demographic group in the housing market area, there is no requirement to reach out to that group. For example, if there are no American Indians or Alaskan natives in the housing market area, there is no need to reach out to that group.

### **Column 1—Project %**

For entities who are proposing to use its funding for existing rental units, the respondent should indicate the demographic composition of the project. If this is an initial AFHMP for rental units or an AFHMP for homeownership units or homeownership assistance do not fill out Column 1.

### **Column 2—Waiting List %**

If this is an initial AFHMP for rental units, homeownership units, or homeownership assistance do not fill out Column 2. If there is an existing waiting list because this AFHMP is for existing rental units or a continuation of an existing homeownership or homeownership assistance program include the demographics of the existing waiting list in Column 2.

### **Column 3—Census Tract %**

Include the percentage of each of the groups in the census tract where the project or scattered site housing is located. If this is scattered site housing, see the AA-5 instructions with regard to Part 3A. If there is no one from the group living in the census tract, write in 0. However, for some census tracts, the percentage of the group may be less than 0 but still have an identifiable presence in the census tract. For example, the percentage of Whites may be 98%, the percentage of Latinos 1.8%, and the percentage of Blacks or African-Americans .2%. Blacks or African-Americans are an identifiable presence even though the percentage of the population in the census is tract is less than 0.

#### **Column 4—Housing Market Area %**

A housing market area is the area (not necessarily the census tract, but the entire geographic area) from which the owner or manager of the project may reasonably expect to draw a substantial number of its applicants. For homeownership units and homeownership assistance, the housing market area must include the entire town or municipality applying for the financial assistance. Do not use an expanded housing market area for homeownership assistance.

See the instructions for Column 3 for information on census data to include.

#### **Column 5—Expanded Housing Market Area %**

If a housing market area is not demographically diverse in terms of race, color, national origin, religion, sex, disability, or familial status, an expanded housing market area must be used. An expanded housing market area is a larger geographic area that may provide additional diversity. Respondents should indicate the housing or expanded housing market area in which the housing is/will be located, e.g., “City of \_\_\_\_\_” for housing market area, or “City of \_\_\_\_\_” and “County of \_\_\_\_\_” for expanded housing market area.

See the instructions for Column 3 for information on the information to include from the Census data.

#### **Determining who is least likely to apply**

Compare groups within rows/across columns on Worksheet 1 to identify any under-represented group(s) relative to the surrounding housing market area. These are the group(s) “least likely to apply” for the housing without targeted outreach and marketing. For example, if the percentage of Whites in the project is 30% and the percentage of Whites on the waiting list is 25%, but the percentage of Whites in the housing market area is 75% and the percentage of whites in the expanded housing market area is 95%, Whites will be one of the groups least likely to apply because Whites are underrepresented in the project and on the waiting list compared to their representation in the market area and the expanded market area.