



City of Mountain View Affirmative Marketing Policy

In accordance with Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) Program regulations and in furtherance of the City of Mountain View's commitment to non-discrimination and equal opportunity in housing, the City of Mountain View has established procedures to affirmatively market units acquired, rehabilitated, constructed or otherwise assisted under the CDBG and/or HOME Programs.

The City of Mountain View is committed to the goals of non-discrimination and equal access. In addition, the City of Mountain View is committed to the goals of increasing the housing opportunities of local low-income residents and under-represented ethnic and racial groups. These goals will be reached through the implementation of the City's Affirmative Marketing Policy. The implementation of this policy is intended to result in a diverse tenant population in each of the affordable housing developments, with a representation of ethnic and racial groups, which is consistent with their representation in the City.

The City of Mountain View is responsible for the implementation of the Affirmative Marketing Policy and all owners, developers, Community Housing Development Organizations and other nonprofits must comply with this policy for all CDBG and/or HOME funded housing developments.

The Affirmative Marketing Policy exists as a separate document maintained in the Community Development Department files. CDBG and/or HOME housing developments are held to the terms of the policy by reference of this policy in the agreement with the City for receipt of CDBG and/or HOME funds.

1. Methods for Informing the Public, Owners and Potential Tenants about Fair Housing Laws and the City's Affirmative Marketing Policy.

- A. The City of Mountain View Community Development Department shall be responsible for implementing the City's Affirmative Marketing Policy.

- B. Recipients of CDBG and/or HOME funds shall be informed of the City's Affirmative Marketing Policy by having this policy referenced in the agreement with the City for the receipt of funds and making compliance with this policy a requirement for the duration of the agreement.
- C. The City shall continue to fund outside agencies to provide fair housing information/referral and case investigation services and tenant/landlord information/referral and mediation services.
- D. The City shall work with its fair housing agency to develop an outreach plan each year, which will include advertisements in local newspapers, public service announcements, distribution of fair housing brochures at relevant events, community presentations, and other outreach activities to inform the community about fair housing rights and responsibilities.
- E. The City shall carry out outreach and provide tenants and rental property owners with copies of the State of California handbook on tenant rights and responsibilities, fair housing brochures as well as the City's Housing Handbook and Affirmative Marketing Policy.
- F. The City shall carry out an annual review to ensure that owners of CDBG and/or HOME funded housing are aware of and complying with the City's Affirmative Marketing Policy.
- G. The City shall periodically post flyers, which describe fair housing laws and services, in the City Hall Lobby, which is open to the public.
- H. Any changes to the City's Affirmative Marketing Policy shall be advertised in a newspaper of general circulation for a minimum of 14 days prior to the effective date of the changes.

2. Description of What Property Owners and the City will do to Affirmatively Market Housing Assisted with CDBG and/or HOME Funds

It is the City of Mountain View's policy to require that each owner of a rental or ownership project carried out with CDBG and/or HOME funds:

- A. Use the "Equal Housing Opportunity" logotype or slogan on all correspondence and advertising prepared relating to the rental of units.
- B. Provide sufficient opportunity (at least three weeks) for all interested persons to submit an application for housing.
- C. Place ads in a local newspaper (selected by the City) to advertise housing opportunities.
- D. Circulate flyers (at least six weeks prior to the opening of any waiting lists) to the Mountain View City Hall, Library, Recreation Department and Senior Center to advertise housing opportunities.

The City of Mountain View shall carry out the following:

- A. Post flyers of upcoming housing opportunities in the City Hall lobby, Senior Center, Recreation Department and Library.
- B. Maintain and make available to interested parties a listing of the affordable housing stock which includes information about who to contact regarding the availability of housing and the estimated month and year (if known) when applications will be accepted from prospective new tenants.
- C. Monitor property owner compliance with the City's Affirmative Marketing Policy.

3. Description of What Property Owners and/or the City will do to Inform Persons not Likely to Apply for Housing without Special Outreach

In order to solicit applications from persons who are not likely to apply for housing without special outreach, each owner of CDBG and/or HOME assisted property will be required to:

- A. Target outreach, through a variety of means, to ethnic and racial groups that are under-represented in the housing development based on their representation in the City.
- B. At a minimum, utilize newspapers, churches, and local social workers that serve the underrepresented group to distribute information about housing openings.

- C. Provide all advertising in the language the group is most familiar with and provide a contact person who can answer questions in the language primarily spoken by the target group.

The City of Mountain View shall carry out the following activities:

- A. Post flyers of housing openings at local laundromats, grocery stores, and other meeting areas frequented by the underrepresented group.
- B. Send flyers to the Housing Authority of the County of Santa Clara, Mountain View Health Center, the Community Services Agency, American Red Cross, and other organizations as identified by the City, which serve groups that may need special assistance to apply for housing.

4. **Tenant Selection Process**

- A. In general, tenants shall be selected on a first come first served basis or by lottery, as specified by the Department of Housing and Urban Development and other funding restrictions of the development.
- B. However, (1) in light of the extreme shortage of affordable housing for local residents and the displacement of low income residents which this situation is creating and, (2) in light of the difficulty of finding affordable housing for persons employed in the City, where feasible and legal, preference shall be given to persons who live or work in Mountain View. The employment must be the primary source of household income and must consist of at least 20 hours of work per week paid at minimum wage or more.
- C. Documentation of residency shall be made by providing at least two pieces of acceptable evidence, including but not limited to the following items and other appropriate evidence subject to City approval:
- Lease agreement verifying residency for at least six months.
 - Copies of utility bills (electric, water, or gas) for the past six months.
 - Federal tax return form from at least six months ago.
 - Driver's license that is at least 6 months old.

D. Documentation of employment shall be made by providing the following:

- A letter on company letterhead from the personnel director (or equivalent position) stating the starting date of employment, the position title and whether the position is full-time, part-time, temporary, contract or other, and the number of hours of employment.
- Copies of check stubs for the past year.
- If employment is a contract position, a copy of the employment contract.

5. Maintenance of Records to Document Actions Taken to Affirmatively Market HOME and/or CDBG assisted Units and to Assess Marketing Effectiveness

The City shall request owners of property assisted under CDBG and/or HOME to maintain the following records:

- Written description of how vacancies were filled
- Copies of newspaper advertisements and flyers or other printed material used
- Copies of mailing lists to organizations that were sent flyers and other material
- Dates and locations where flyers were delivered or posted
- The racial, ethnic and gender characteristics of tenants and applicants

The City shall, on an annual basis as part of its annual performance report to the Department of Housing and Urban Development, review compliance with the City's Affirmative Marketing Policy and consult with the property owners about any improvements which need to be made. The City shall maintain records regarding housing openings which occurred during the year and the process used to fill the openings.

The City will examine whether or not persons from a variety of racial and ethnic groups in the City applied for or became tenants of units that were affirmatively marketed. If the City finds that a variety of ethnic groups are represented, the City will assume that the affirmative marketing procedures were effective. If one or more groups are not represented consistent with their representation in the City or there is an overrepresentation of particular groups, the City will review its procedures to determine what changes, if any, might be made to make the affirmative marketing efforts more effective.

6. What Corrective Actions will be Taken Where Affirmative Marketing Requirements are not Met

The City of Mountain View will take corrective action if it is determined that a participating property owner has failed to carry out affirmative marketing efforts as required by the City's agreement. The City, prior to taking any corrective action, will discuss with the owner ways to improve affirmative marketing efforts. Initially, the City will put the property owner on notice and provide a reasonable time period to establish written procedures for future use. If a participant property owner, after receiving fair warning and an opportunity to correct identified deficiencies, continues to neglect the responsibilities made incumbent by the terms of the participation agreement, the City will consider taking one or both of the following actions:

- i. Declare the property owner disqualified from any further assistance made available under the HOME/CDBG Programs; and
- ii. Notify the property owner that he/she is in violation of the terms of the agreement with the City and that the City will exercise the stipulation clause and require immediate repayment of the loan.