

## **I. FAIR HOUSING and ACCESSIBILITY**

*Regulatory/Statutory Citations: 24 CFR Part 100; N-91-2011, FR 2665-N-06 Fair Housing Accessibility Guidelines; Fair Housing Act of 1968 (42 U.S.C. 3601); Fair Housing Planning Guide;*

Federal law prohibits discrimination on the basis of race, color, religion, sex, disability, or national origin in programs and activities receiving federal financial assistance through a number of statutes, regulations, and executive orders.

The Fair Housing Act, as amended, prohibits discrimination in the sale, rental, or financing of dwellings and in other housing-related activities on the basis of race, color, religion, sex, disability, familial status, or national origin. This applies to the sale, rental, and financing of dwellings, and in other housing-related transactions, as well as the accessibility and usability by persons with disabilities. This section addresses the City's commitment to these requirements.

### **A. Policy: Analysis of Impediments to Fair Housing Choice or Affirmative Fair Housing Assessment**

*Regulatory/Statutory Citations: Fair Housing Act of 1968 (42 U.S.C. 3601);*

The City requires the utilization of affirmative fair housing marketing practices in soliciting renters or buyers, determining their eligibility, and completing all transactions.

In accordance with the Fair Housing Act, the City must administer all CDBG programs and activities related to housing and community development in a manner to affirmatively further the policies of the Fair Housing Act. As part of the certification to affirmatively further fair housing that the City is required to submit with its five-year consolidated plan an Analysis of Impediments to Fair Housing Choice (AI) or an Affirmative Fair Housing Assessment (AFHA) and to take actions to overcome the effects of any impediments identified through the AI or AFHA analysis.

The City of Moore prepared its current Analysis of Impediments to Fair Housing Choice in program year 2020.

### **B. Policy: Affirmative Fair Housing Plan**

*Regulatory/Statutory Citations: Section 109, 570.602 Title VIII of the Civil Rights Act of 1968 and Executive Order 11063*

The City of Moore, Oklahoma is committed to Affirmatively Furthering Fair Housing (AFFH) in all aspects of its operations. The Affirmative Fair Housing Plan (AFHP) is one part of the City's effort. The purpose of the AFHP is to promote a condition in which individuals of similar income levels in the same housing market area have available to them a like range of choices in housing regardless of their race, religion, color, national origin, sex, gender identity, disability, or familial status.

## **C. Policy: Fair Housing Requirements and Duties**

The Fair Housing Policy outlines the requirements and duties for various participants in the implementation of the City's Fair Housing efforts:

### **1. City Responsibilities**

The Department of Capital Planning & Resiliency (CP&R) Duties:

- Assuring projects using Community Development Block Grant (CDBG), funds will conform to HUD AFFH regulations and where applicable, state and local codes.
- The City of Moore and/or its developers and sub recipients will maintain policies and procedures, operating guides/manuals, standards, and records as required by HUD.
- The City will place a link to this policy on the *Grants, Programs and Disaster Recovery* page on the City of Moore's website.
- The City will provide or cause to be provided technical assistance through training and written information to owners, developers, and sub recipients of CDBG housing funds.
- Developers and Sub recipients will be required to maintain documentation relating to eligibility, outreach and outcomes.
- CP&R will perform onsite monitoring visits on a regular basis, at least once a year, to ensure compliance of sub recipients with HUD's goals and regulations
- To ensure developer and sub recipients understand their responsibilities and based on the type of activity and complexity, CP&R staff will provide technical assistance on an as needed basis.
- The City of Moore will contract all fair housing services with Metro Fair Housing Authority (MFHA), and will work closely with the organization to resolve complaints and increase education on fair housing trends and issues.

### **2. Owner/Developer/Manager/Sub-Recipient Responsibilities**

The City of Moore requires all owners/developers/sub-recipients to meet the Moore AFHM Policy by:

- Use creative strategies to target and reach out to segments of the eligible population which are least likely to apply for housing without special outreach efforts.
- Develop an outreach outline which shows the special measures designed to attract those groups identified as least likely to apply and other efforts designed to attract persons from the targeted eligible populations.
- Media utilization to specify the means of advertising to reach the target groups identified and the strategy behind the use of various types of print/electronic media
- Evaluation of outcomes used to measure the success of the marketing program and ensure the compliance of all Fair Housing requirements.
- Staff training to demonstrate effective delivery of information on fair housing laws and objectives to the populations targeted markets served by the owners/developers/sub recipients.

### 3. Project Owner/Manager Responsibilities

The following requirements apply to any owner/developer/sub-recipient/manager of multi-family housing projects consisting of 5 or more units and to owners/developers/sub-recipient of single-family homes who developed 5 or more units in the previous 12-month period OR who plan to develop 5 or more units in the following 12 months. Moore requires the utilization of affirmative fair housing marketing practices in soliciting renters or buyers, determining their eligibility, and completing all transactions. All owners/developers/sub recipients must comply with the following requirements for the duration of the applicable compliance period:

- Advertising:
  - The Equal Housing Opportunity logo or slogan must be used in all signs, ads, brochures, and written communications.
  - Advertising media may include, but is not limited to any local newspaper, radio, television station, social media outlet, website, brochures, leaflets, bulletin boards and signage.
  - Ads in newspapers, if used, must include: The Daily Oklahoman and El Latino American
  - All social media outlets utilized (Facebook, Twitter, Instagram, etc.) must include the Equal Housing Opportunity logo or slogan
  - Ads on television or radio must state the development supports “Equal Housing Opportunity”
  - The City has specified several organizations which serve generally underserved populations. Any rental development must send each organization a letter providing general information regarding the rental opportunity. The letter must include the Equal Housing Opportunity logo or slogan, and a copy of each letter must be kept on file for review by the City.
  - The organizations contained in Attachment A must be contacted during the initial marketing effort.
  - Fair Housing Poster:
    - Owners/developers/ must display a HUD fair housing poster in all rental offices and where potential tenants may likely come to apply for housing.
  - Project Sign:
    - Owners must post in a conspicuous position on all project sites a sign displaying prominently either the HUD approved Equal Housing Opportunity logo or slogan or statement.
  - Submission of an Affirmative Fair Housing Marketing Plan:
    - Owners must submit a Form HUD 935.2A to the City.  
(<http://portal.hud.gov/hudportal/documents/huddoc?id=935-2a.pdf>) for multifamily projects or Form HUD 935.2B  
(<http://portal.hud.gov/hudportal/documents/huddoc?id=935-2b.pdf>) for single family projects.
    - The AFHM Plan must be approved by the Project Grants Manager (P-GM)
    - The AFHM Plan must remain in force throughout the life of the project.
    - The AFHM Plan must be submitted at least 30 days prior to pre-lease or marketing of units, whichever occurs first.

- The City may require changes when the law or regulations change at the federal, state or local level.

#### 4. Affirmative Fair Housing Marketing (AFHM) Plan

*Regulatory/Statutory Citations: 24 CFR 570.602, Section 109*

The City shall establish and maintain an Affirmative Fair Housing Marketing (AFHM) Plan as required. The City shall require all developers and/or owners of rental property assisted with CDBG-DR funds to adopt and follow the City’s AFHM Plan.

The City of Moore, Oklahoma is committed to affirmatively furthering fair housing in all aspects of its operations. The Affirmative Fair Housing (AFHM) Plan is one part of the City’s effort. The purpose of the AFHM Plan is to promote a condition in which individuals of similar income levels in the same housing market area have available to them a like range of choices in housing regardless of their race, religion, color, national origin, sex, disability or familial status.

#### D. Procedures: Fair Housing

Overview of Fair Housing Procedures	
Responsible Party	Task
Project-Grants Manager (P-GM)	Management, technical assistance; fair housing services; and staff training
Administrative Assistant (CDBG-A)	Maintaining manuals and materials; posts to the <i>Grants, Programs and Disaster Recovery</i> page on the City’s website
Compliance Specialist (CS)	Annual compliance monitoring

##### 1. General

The P-GM is responsible for:

- Managing the City’s overall fair housing efforts;
- Providing or causing to be provided technical assistance through training and written information to owners/developers/sub-recipients of CDBG-DR housing funds on an as-needed basis.
- Contractually requiring owners/developers/sub-recipients to maintain documentation relating to eligibility, outreach, and outcomes;
- Providing or contracting for fair housing services for the City;
- Providing training to CP&R staff;

The CDBG-A is responsible for:

- Maintaining policies and procedures, operating guides/manuals, standards, and records

- as required by HUD;
- Posting the last Analysis of Impediments to Fair Housing on the *Grants, Programs and Disaster Recovery* page on the City's website; and
  - Posting the current Assessment of Fair Housing on the *Grants, Programs and Disaster Recovery* page on the City's website;
  - Ensuring the Equal Housing Opportunity logo or slogan is used in all signs, ads, brochures, and written communications produced by CP&R;

The CS is responsible for:

- Performing onsite monitoring visits on a regular basis, at least once a year, to ensure compliance of owners/developers/sub-recipient's with HUDs and the City's goals and regulations.
  - In addition to the requirements of this section, multifamily owners, developers and management firms are required to complete and consistently implement an Affirmative Fair Housing Marketing Plan

## 2. ATTACHMENT A: List of Marketing Targets

Moore Youth and Family  
Attn: Executive Director  
624 NW 5<sup>th</sup> St.  
Moore, Oklahoma 73160

Aging Services Inc.  
Attn: Executive Director  
1179 East Main St.  
Norman, OK 73071

Bethesda, INC.  
Attn: Executive Director  
1181 East Main St.  
Norman, OK 73071

Moore Public Schools  
Foundation for Excellence  
PO Box 6100  
Moore, Oklahoma 73153

Father's Business  
825 NW 24<sup>th</sup> St.  
Moore, Oklahoma 73160

Moore Public Library  
Branch Manager  
225 S. Howard Ave  
Moore, Oklahoma 73160

Mary Abbott Children's House  
231 East Symmes  
Norman, Oklahoma 73069

Moving Forward After School  
Program  
2444 Nottingham Way  
Moore, Oklahoma 73160

Cleveland County Habitat for  
Humanity  
1855 Industrial Boulevard  
Norman, Oklahoma 73071

City of Norman  
Continuum of Care  
PO Box 370  
Norman, OK 73707

Center for Children & Families  
1151 E. Main St.  
Norman, Oklahoma 73071  
210 S. Cockrel Ave. Norman,  
OK 73071

Cleveland County Career  
Center  
1125 E. Main St.  
Norman, Oklahoma 73071

Central Oklahoma Community  
Action Agency  
1155 E. Main St.  
Norman, Oklahoma 73071

Compassion Pointe  
1173 E. Main St.  
Norman, Oklahoma 73071

Crossroads Youth and Family  
Services  
1333 W. Main St.  
Norman, Oklahoma 73069

DAG Educational Enrichment  
Center  
1183 E. Main St  
Norman, Oklahoma 73071

Oklahoma People First  
1183 E. Main St  
Norman, Oklahoma 73071

First Church Moore  
301 NE 27th St.  
Moore, OK 73160

Norman variety Care  
317 E Himes St.  
Norman, OK 73069

First United Methodist Church  
201 W. Main St.  
Moore, Oklahoma 73160

Food and Shelter for Friends,  
Inc.  
Attn: Executive Director  
PO Box 5537  
Norman, OK 73070

CART  
Attn: Douglas Myers  
731 Elm Ave  
Norman, OK 73019

Community Services Building,  
Inc.  
Attn: Christi Moore  
1183 E. Main St  
Norman, OK 73071

Thunderbird Clubhouse Board,  
Inc.  
Attn: Executive Director  
PO Box 1666  
Norman, OK 73070

Among Friends Activity Center,  
Inc.  
Attn: Michi Medley  
1185 E. Main St.  
Norman, OK 73071

Center for Children and  
Families, Inc.  
Attn: Executive Director  
1151 E. Main St.  
Norman, OK 73070

Bridges, Inc.  
Attn: Executive Director  
1670 N. Stubbeman  
Norman, OK 73069

Big Brothers and Big Sisters of  
Oklahoma  
PO Box 1355  
Norman, OK 73070

Serve More  
224 S Chestnut Ave  
Moore, OK 73160

Crime Stoppers of Moore  
117 E. Main St.  
Moore, OK 73160

Cleveland County Health Dept.  
424 S Eastern Ave  
Moore, OK 73160

Progressive Independence, Inc.  
Attn: Executive Director  
121 N. Porter  
Norman, OK 73071

Metropolitan Fair Housing  
Council, Inc.  
Attn: Mary Dulan  
312 NE 28<sup>TH</sup> ST. SUITE 112  
Oklahoma City, OK 73105

Brilliant Book Clubs  
ATTN: Lindsay McClellan  
2641 Kent Dr.  
Oklahoma City, OK 73120

Moore Faith Medical Clinic  
224 S. Chestnut Ave, STE 100  
Moore, OK 73160

### 3. Procedure: Affirmative Fair Housing Marketing Plan

Overview of Fair Housing Procedures	
Responsible Party	Task
Project-Grants Manager (P-GM)	Reviews
Administrative Assistant (CDBG-A)	Administrative activities
Compliance Specialist (CS)	Monitoring Plan

The owner/developer/sub-recipient reviews the City's Fair Housing Policy and requirements;

The Developer must submit an Affirmative Marketing Plan at least 30 days prior to pre-lease or marketing of units, whichever occurs first. The owner/developer/sub-recipient completes:

- Form HUD 935-2A (<http://portal.hud.gov/hudportal/documents/huddoc?id=935-2a.pdf>) for multifamily projects or
- Form HUD 935-2B (<http://portal.hud.gov/hudportal/documents/huddoc?id=935-2b.pdf>) for single family projects.
- The owner/developer/sub-recipient submits the AFHM Plan to the P-GM for review.
- The P-GM reviews and approves or denies the AFHM Plan;
  - If denied, the owner/developer/sub-recipient resubmits until approved;
- The P-GM forwards the approved AFHM Plan to the CDBG-A and the CS;
- The CDBG-A files the AFHM Plan in the owner/developer/sub-recipients file;
- The CS utilizes the AFHM Plan in the monitoring plan for the owner/developer/sub-recipient