

**WESTCHESTER COUNTY FAIR AND AFFORDABLE HOUSING  
IMPLEMENTATION PLAN  
August 9, 2010**

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**Appendix G-1(i): Westchester County Affirmative Fair Housing Marketing Plan  
as approved December 29, 2011**

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# WESTCHESTER COUNTY

## AFFIRMATIVE FAIR HOUSING MARKETING PLAN

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### **I. Overview**

Westchester County (the “County”) requires the marketing of affordable housing units that affirmatively further fair housing (the “AFFH units”). This marketing will be conducted under a two-pronged approach to promote its fair housing efforts so as to reach all potentially eligible households, especially those least likely to apply (“LLA”). The County will conduct its own marketing, under the Westchester County Affirmative Fair Housing Marketing Plan (the “Westchester County AFHMP”), and also will require that developers of housing developments work with the County-selected Marketing Consultant to prepare and implement a Housing Development Affirmative Fair Housing Marketing Plan (the “Plan”) for all developments.

### **II. Marketing Consultant**

- A. In consultation with local government leaders, the U.S. Department of Housing and Urban Development (“HUD”), and the local development community, the County will conduct an RFP or RFQ process to select an experienced housing counseling agency to serve as Marketing Consultant to assist in marketing the AFFH units. It would be appropriate to consider, in choosing a Marketing Consultant, whether the candidate has a record of successful outreach and placement of applicants who might be considered least likely to apply.
- B. The qualitative criteria to be used in evaluating applicants for the Marketing Consultant position should include previous experience with HUD, housing counseling, and affirmative marketing.
- C. Developers will contribute a fee, commensurate with the size of their developments, toward the cost of the Marketing Consultant.
- D. The County will contribute toward the cost of the Marketing Consultant by using funds in its Outreach and Education budget. The County should explore using additional amounts under the Settlement to support the efforts of the Marketing Consultant.

### **III. Fair Housing Marketing**

The County will:

- A. Advertise the rights of all persons to fair housing and avenues to redress allegations of housing discrimination, including informing the public that complaints may be filed with the Westchester County Human Rights Commission (“HRC”) and HUD.
- B. Create and fund campaigns to broaden support for fair housing and promote the fair and equitable distribution of affordable housing in all communities including public outreach specifically addressing the benefits of mixed-income housing and racially and ethnically integrated communities. Such campaigns will include development of materials such as press releases, public services announcements (“PSAs”), brochures and other literature to be made available for wide distribution as appropriate. The press releases will be issued to all outlets included below in Section III.C. Other campaign items will be made available as part of the County Activities in Section V, including subsections D, I, J and M.
- C. Educate realtors, condominium and cooperative boards, landlords and municipalities with respect to fair and affordable housing activities. The County will reach out to these entities through their respective associations such as:
  1. Hudson Gateway Association of Realtors (the successor organization to the Westchester Putnam Association of Realtors, the Rockland County Board of Realtors and the Orange County Association of Realtors) which is one of the largest Realtor Associations in the nation
  2. Real Estate Board of New York
  3. Greater Fairfield Board of Realtors
  4. Westchester County Association and Business Council of Westchester
  5. Building & Realty Institute which services primarily Westchester/Mid-Hudson Valley (1,500 members); also serves as staff to the following organizations which also serve primarily Westchester/Mid-Hudson Valley:
    - a. The Apartment Owners Advisory Council
    - b. Cooperative and Condominium Advisory Council
    - c. Advisory Council of Managing Agents
  6. Council of New York Cooperatives & Condominiums
  7. Federation of New York Housing Cooperatives & Condominiums

8. Rent Stabilization Association of New York City
9. Landlords of Rockland County
10. 1199 SEIU NYC
11. Westchester Municipal Officials Association
12. Fairfield County
13. Putnam County
14. Rockland County
15. City of New York

#### **IV. Affirmative Fair Housing Marketing**

The County has developed this Westchester County AFHMP to promote and publicize AFFH units and ensure outreach to racially and ethnically diverse households in Westchester County and all contiguous counties, which include: Putnam County and Rockland County in New York, Fairfield County in Connecticut, and the five counties which comprise New York City, which includes areas that have large non-white populations (the “Marketing and Outreach Area”). Such outreach will be in conformance with HUD Handbook 8025.1 REV-2, which states in Section 2-2:

*“PURPOSE OF THE AFHM PLAN. The Affirmative Fair Housing Marketing Plan is a marketing strategy designed to attract buyers and renters of all majority and minority groups, regardless of sex, handicap and familial status to assisted and insured rental projects and sales dwellings which are being marketed by an applicant.”*

The County’s efforts will include marketing of AFFH units through County activities described below:

- A. Centralize the intake of potential homebuyers and renters for AFFH units through the use of a internet-based interest form, the Westchester County Homeseeker (the “Centralized Intake System” or the “List”), which collects contact information, racial and ethnic characteristics of the head of household, and household size and income information. The County requires that housing developers undertake specific outreach to persons interested in AFFH units who have signed up via the List.
- B. In the process of accessing the List to sign up on the County’s Homeseeker webpages, interested persons are provided with information for home buyer counseling, including HUD-certified housing counseling agencies and their contact information, and are given the opportunity to review current housing opportunities including community resources, location of employers in the area,

affordable housing developments in development, under construction, or completed as detailed in subsection III.F below.

- C. Use press releases, PSAs and other means to inform interested homebuyers and renters that they may sign up on the List, available at <https://www.westchestergov.com/homeseeker> (or its successor sites) to receive notification of AFFH housing units as they are being marketed. The press releases and announcements will include the Equal Housing Opportunity (“EHO”) logo and, where applicable, the International Accessibility logo, which can be found at <http://www.hud.gov/library/bookshelf11/hudgraphics/fheologo.cfm> and <http://nysdchr.gov/Forms/FairHousing/>. The HUD logo website provides guidance on size and use of the EHO logo.

The media outlets to which the County will issue press releases and announcements include:

1. Newspapers/Publications
  - a. General Population Newspapers/Publications

<b>All Counties in Market and Outreach Area</b>	<p>The <i>Daily News</i>, a daily New York City newspaper with a circulation of over 630,000 available in the eight New York counties in the Marketing and Outreach Area.</p> <p>The <i>New York Post</i>, a daily New York City newspaper with a circulation of over 500,000 available in the eight New York counties in the Marketing and Outreach Area.</p>
<b>New York City (All boroughs)</b>	<p><i>Metro</i> or <i>AMNY</i>, a free daily newspapers serving the five boroughs of New York City.</p> <p><i>Newsday</i>, a daily Long Island and New York City newspaper with a circulation of over 300,000 available throughout the New York metropolitan area.</p>
<b>Fairfield County</b>	<p>The <i>Norwalk Hour</i>, an independent daily in the Norwalk, CT area with a focus on real estate listings.</p> <p>The <i>Stamford Advocate</i>, a daily newspaper with a stated market area of lower Fairfield County with a daily real estate section.</p>
<b>New York City (Bronx)</b>	<p>The <i>Riverdale Press</i>, <i>The Bronx News</i>, <i>Co-Op City Times</i>, <i>Norwood News</i>, <i>Parkchester News</i>, and/or the <i>Mott Haven Herald</i>, Bronx local weekly newspapers.</p> <p><i>Newsday</i>, a daily Long Island and New York City newspaper with a circulation of over 300,000 available throughout the New York metropolitan area.</p>

<p><b>Putnam County</b></p>	<p>The <i>Putnam Examiner</i>, local weekly publication covering Putnam County.</p> <p>The <i>Brewster Standard</i>, the <i>Putnam County Courier</i> (Carmel), and/or the <i>Putnam County Press</i> (Mahopac), Putnam County local weekly newspapers.</p> <p>The <i>Journal News</i>, a Westchester, Rockland and Putnam daily newspaper published by Gannett Westchester Newspapers, containing a daily real estate section, available in print and electronic formats.</p> <p>The <i>Daily News</i>, a daily New York City newspaper with a circulation of over 630,000 available in the eight New York counties in the Marketing and Outreach Area.</p> <p>The <i>New York Post</i>, a daily New York City newspaper with a circulation of over 500,000 available in the eight New York counties in the Marketing and Outreach Area.</p>
<p><b>Rockland County</b></p>	<p>The <i>Journal News</i>, a Westchester, Rockland and Putnam daily newspaper published by Gannett Westchester Newspapers, containing a daily real estate section, available in print and electronic formats.</p> <p><i>Rockland Times</i> – a weekly newspaper serving Rockland County  <i>Rockland Review</i> – a weekly newspaper serving Rockland County.</p> <p>The <i>Daily News</i>, a daily New York City newspaper with a circulation of over 630,000 available in the eight New York counties in the Marketing and Outreach Area.</p> <p>The <i>New York Post</i>, a daily New York City newspaper with a circulation of over 500,000 available in the eight New York counties in the Marketing and Outreach Area.</p>
<p><b>Westchester County</b></p>	<p><i>Patch</i>, an online community-specific news and information platform providing local coverage electronically covering the Local Market Area.</p> <p>The <i>Pennysaver</i>, a weekly paper delivered free to all households in the Marketing and Outreach area; contains a real estate section.<sup>1</sup></p> <p>The <i>Journal News</i>, a Westchester, Rockland and Putnam daily newspaper published by Gannett Westchester Newspapers, containing a daily real estate section, available in print and electronic formats.</p>

<sup>1</sup> The *Pennysaver* is published to local markets throughout the Marketing and Outreach Area and should be utilized wherever it is practical.

b. Publications that specifically target the LLA populations<sup>2</sup>

<p><b>Fairfield County African American</b></p>	<p><i>Inquiring News</i>, New England’s largest African American newspaper, covering Connecticut, including Fairfield County.</p> <p><i>Haitian Times</i>, a weekly newspaper serving the Haitian community in the New York metropolitan area, available in print and electronic format.</p>
<p><b>Fairfield County Hispanic</b></p>	<p><i>El Sol News</i>, a Spanish-language newspaper published in Stamford, CT, distributed in southern-Fairfield County and Westchester County.</p> <p><i>El Diario NY</i>, a Spanish-language daily published in New York City with distribution throughout the Marketing and Outreach Area.</p>
<p><b>New York City (all boroughs) African American</b></p>	<p><i>Amsterdam News</i>, historic weekly newspaper published in Harlem, with large African American following in New York City, especially Manhattan.</p> <p><i>Haitian Times</i>, a weekly newspaper serving the Haitian community in the New York metropolitan area, available in print and electronic format.</p> <p>The <i>Black Star News</i>, weekly newspaper with on-live edition published in Manhattan.</p> <p><i>Our Time Press</i>, a weekly newspaper published in Brooklyn with African American following, especially Brooklyn.</p> <p><i>Caribbean Life</i>, New York City’s weekly Caribbean community weekly newspaper serving the New York area.</p>
<p><b>New York City (all boroughs) Asian</b></p>	<p><i>World Journal</i>, a Chinese language daily newspaper covering news of interest to the Chinese community in New York City, particularly New York County.</p> <p><i>Sing Tao Daily</i>, the second largest Chinese daily newspaper published in New York City; markets to the Chinese immigrant community in communities with high concentrations of Chinese immigrants (e.g., Chinatown in NYC).</p>

<sup>2</sup> This list may be updated and expanded over time.

<p><b>New York City (Manhattan/ Brooklyn/ Queens)</b> <b>Asian</b></p>	<p><i>Newsletter of the Asian American Federation of New York</i>, which is distributed through member agencies in Manhattan, Brooklyn and Queens.</p>
<p><b>New York City (all boroughs)</b> <b>Hispanic</b></p>	<p><i>Hoy NY</i>, a Spanish-language daily newspaper, serving the New York metropolitan area, including Westchester. <i>El Diario NY</i>, Spanish-language daily published in New York City with distribution throughout the Marketing and Outreach Area.</p>
<p><b>Putnam County</b> <b>African American</b></p>	<p><i>Haitian Times</i>, a weekly newspaper serving the Haitian community in the New York metropolitan area, available in print and electronic format.</p>
<p><b>Putnam County</b> <b>Hispanic</b></p>	<p><i>El Diario NY</i>, a Spanish-language daily published in New York City with distribution throughout the Marketing and Outreach Area. <i>El Aguila del Hudson Valley</i>, a bi-weekly publication geared to the Hispanic/Latino community; “the only Spanish and English newspaper in New York”; published in Wappinger’s Falls, it serves Dutchess, Putnam, and Westchester counties.</p>
<p><b>Westchester County</b> <b>African American</b></p>	<p>The <i>Westchester County Press</i>, a weekly newspaper that covers African American news throughout Westchester County. <i>Haitian Times</i>, a weekly newspaper serving the Haitian community in the New York metropolitan area, available in print and electronic format.</p>
<p><b>Westchester County</b> <b>Asian</b></p>	<p><i>Newsletter of the Organization of Chinese Americans</i>, which is distributed throughout Westchester County.</p>
<p><b>Westchester County</b> <b>Hispanic</b></p>	<p><i>El Sol News</i>, a Spanish-language newspaper published in Stamford, CT, distributed in southern-Fairfield County and Westchester County. <i>Hoy NY</i>, a Spanish-language daily newspaper, serving the New York metropolitan area, including Westchester. <i>El Diario NY</i>, a Spanish-language daily published in New York City with distribution throughout the Marketing and Outreach Area.</p>

	<p><i>El Aguila del Hudson Valley</i>, a bi-weekly, bilingual, free publication targeted to the Hispanic/Latino community, published in Wappinger’s Falls, serving Dutchess, Putnam, and Westchester counties.</p>
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2. Radio and Television

The County will seek opportunities for radio and television coverage (via interviews, press releases, and news coverage) The press releases prepared will also be sent to all television and radio outlets listed below.

The County will request that PSAs be run on each of the municipal cable stations in the County. The below listed outlets will be included:

- a. General population television networks: Local cable television (Cablevision, Time Warner, RCN, RNN, News 12, NY1 and others that may be identified in the Plan) and regional/ network television (local CBS, NBC, ABC, FOX, and CW affiliates)
- b. Radio stations: Local (WFAS, WHUD, WVOX, WVIP) and regional/network resources (WINS, WCBS, and others that may be identified in the Plan) throughout the Marketing and Outreach Area are to be utilized.
- c. Additionally, the Plan must anticipate that the Developer or Marketing Consultant will seek radio and television coverage with stations that focus on the LLA populations, including the following:

<b>Marketing and Outreach Area</b> <b>African American</b>	<i>Black Entertainment Television (“BET”).</i>
<b>New York City (Bronx)</b> <b>African American/ Hispanic</b>	<i>BronxNet</i> , local cable television network covering the Bronx, NY.

<p><b>New York City (all boroughs), Rockland County, Westchester County Hispanic</b></p>	<p><i>Telemundo</i>, Channel 47, NYC Hispanic television network</p> <p><i>Univision</i>, Channel 41 (WXTV-NY), Univision’s Spanish language television network broadcasting from Teaneck, NJ, to New York City and Westchester and Rockland counties.</p> <p><i>Univision Radio WADO</i> (1280 AM), <i>Radio La Kalle</i> (105.9 FM), and <i>WQBU</i> (92.7 FM), Univision’s Spanish-language radio outlets in NYC, both AM and FM.</p> <p><i>La Mega</i> (97.9 FM), Latin music, news, and culture radio station broadcast from Manhattan to New York City, as well as Westchester, and Rockland counties. (Hispanic/Latino).</p>
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3. Web-Based Media

The County will seek web-based media coverage with sites that focus on the LLA populations, including the following:

- a. Bronx News Network, a community-based website focusing on local Bronx news (<http://www.bronxnewsnetwork.org>) (African American and Hispanic Latino populations targeted);
  - b. Asian Community Online Network (<http://www.acon.org>);
- D. Work in conjunction with local not-for-profit organizations and community organizations, to provide information about the availability and purpose of the Homeseeker webpage and the List, which may include participation in ethnic festivals and fairs and other events where interested persons will be provided with information on how to sign up. Where feasible, this may also include providing onsite access to the internet-based form.
- E. Work with each municipality included in the Marketing and Outreach Area to provide information about housing opportunities on their local networks and to their employees through requesting each to post information regarding housing opportunities on their websites, or other means of communications, including sharing of press releases, public services announcements, fliers and links to the County’s Homeseeker webpages.
- F. The County will maintain a website with general information about affordable housing, which will include:
- 1. Information about the types of documentation (financial or otherwise) generally required to apply for affordable ownership/rental units.
  - 2. Westchester County Income Limits for affordable housing.

3. Contact information for HUD-certified housing counseling agencies.
  4. Contact information for local fair housing agencies and organizations, including the HUD Office of Fair Housing and Equal Opportunity (“OFHEO”), the County’s Human Rights Commission (“HRC”) and Westchester Residential Opportunities (“WRO”).
  5. Contact information for the State of New York Mortgage Agency (“SONYMA”), which provides home mortgage financing.
- G. The County will maintain the Homeseeker website containing specific developments as they become available, which will include:
1. Information on all available units and housing developments (both rental and ownership), including location, size, and prices or rents for the available units;
  2. GIS maps of the location of each development showing schools, municipal and other local government offices, community facilities and services, availability of public transportation and a selection of other nearby features;
  3. Floor plans and unit layouts;
  4. Estimated dates that the AFFH units may become available for occupancy and any available marketing materials;
  5. Contact information for the Marketing Consultant and Developer for more information;
  6. Links to marketing material provided by the Marketing Consultant;
  7. A link to the application for the development including submission requirements and schedule for application processing and selection; which will be made available at the time it is made available by the Marketing Consultant through other marketing efforts;
  8. Links to the municipality within which the development is located;
  9. Links to the school district within which the development is located;
  10. Announcements and calendar of upcoming information sessions for the development;
  11. Announcements and calendar of upcoming tours of the communities where the AFFH developments are located;

12. The HUD Fair Housing Logo and the Accessibility Logo, where applicable, will be included.
- H. The County will publicize the general and specific websites to HUD-certified counseling agencies within the Marketing and Outreach Area, and instruct the agencies on how to assist potential applicants in submitting information to the Centralized Intake System and submitting applications for specific developments.

## V. County Activities

Additional County activities in support of the marketing effort will include:

- A. Reviewing of marketing data collected by the Marketing Consultant, including information on the number of inquires and applications submitted for the development, the source of any referral, and the racial and ethnic data provided to the developer by the persons inquiring or applying for AFFH units.
- B. Monitoring the Marketing Consultant's efforts to conduct outreach to least likely to apply populations as determined by the housing development specific Plan.
- C. Taking steps to direct the Marketing Consultant to increase and/or re-evaluate outreach efforts if LLA populations are not well-represented in accordance with HUD's Handbook 8025.1, Chapter 2 (page 16). The AFHM Plan for any given development will:

*“describe the means by which the effectiveness of various components of the AFHM Plan such as advertising methods and the outreach activities targeted toward the groups identified as LLA or the use of community contacts” will be assessed.*

*“Indicators such as the anticipated racial/ethnic composition of the tenant populations or applicant pool are not to be used as indicators of effectiveness of the Plan under any circumstances.”*

*The Marketing Consultant is “encouraged to use indicators based on good faith efforts, including the number of referrals by community organization; the number of visits to the site or walk-ins due to outreach or advertising; or the representation of persons identified as LLA as part of the potential purchaser or renter group in comparison to the percentage of that group within the housing market area.”*

- D. Placing public service advertisements on Bee-Line Buses and Metro-North trains that inform the public about the Fair Housing Campaign and the Affirmative Fair Housing Marketing and promote the County's AFFH Program and the Centralized Intake List.

- E. Periodically, conducting “Housing Alive” bus tours open to the public, municipal officials, press and others to demonstrate how AFFH units fit into any community, including location and aesthetic aspects of the AFFH unit.
- F. Periodically, updating “Housing Alive” Video to add footage of new AFFH developments and to include messages about fair housing, and assess the most effective ways in which to distribute the video.
- G. Preparing PSAs and requesting media outlets to broadcast PSAs regarding the County’s AFFH Housing Program, in general and for specific developments as they become available.
- H. Issuing press releases when specific developments begin to initiate their marketing and applications are being accepted.
- I. Utilizing the County’s website, Twitter and Facebook (and any emerging or successor social media) to promote open houses, availability of applications and other housing information.
- J. Working with community informational resources including: libraries, churches, community agencies, municipalities and non-profit agencies, including agencies who deal specifically with the disabled community, senior citizens and minority groups who have been identified as least likely to apply, to help disseminate information to the public.
- K. Marketing must include Spanish-language marketing material to serve the population that is Limited English Proficient (“LEP”). To address the needs of LEP persons who do not speak either English or Spanish, the County has an account with a “Language Line” that provides 24/7 translators which can be accessed as needed by County staff to assist in serving all other LEP persons.
- L. Providing marketing materials to faith-based and community organizations that serve newly arrived immigrants.
- M. Providing marketing materials to adult-education training centers or during English as a Second Language classes as requested.
- N. Encouraging Voluntary Affirmative Marketing Agreements between local real estate industry trade associations and the HUD-certified housing counseling agencies to help further fair housing and conduct outreach. Such agreements may include provisions regarding reduced fees and a commitment to advise potential customers about available AFFH units.

## **VI. Review, Approval and Monitoring of AFHMP for AFFH Developments**

The Marketing Consultant must seek the review and approval by the County of all Plans submitted for AFFH developments. The County’s approval must be given prior to the funding of the development. The County’s approval of the Plan will be based on whether the Plan

addresses all the requirements set forth in the requirements for the specific housing development Plan. County staff utilizes HUD's Guidebook 8025.1, Implementing Affirmative Fair Housing Marketing Requirements, as guidance to ensure that all required items are addressed appropriately in the Plan.

- A. The County will track timely submission of all required documentation by the Marketing Consultant. This documentation will include items identified in the Housing Development specific Plan that must be provided to the County for comment, marketing data and other items as identified in the requirements for the Plan.
- B. The County will review documentation that marketing activities in the Plan have been performed, including affidavits of publication of ads, copies of published articles, logs of contacts made to community contacts, copies of letters and other communications as described in the County approved Plan including outreach steps taken to persons signed up on the List.
- C. The County will also require a monthly report provided by the Marketing Consultant summarizing the marketing activities for each month that marketing takes place.
- D. The County will require a report upon completion of the initial marketing period that includes the total number of applicants, the race and ethnicity of the applicants, and disposition of the applications, including the number accepted for processing, the number rejected and reason for rejection, or other disposition status and action including selection for occupancy. This information documents the results of the affirmative marketing activities.
- E. Such monitoring will assist the County in determining the effectiveness of the Housing Development specific Plan, including the effectiveness of the outreach to LLA populations and advise the Marketing Consultant to adjust or increase outreach and advertising to encourage increased interest in the development by LLA households.
- F. The County will withhold certification of qualified tenants and homebuyers if the Marketing Consultant is not in compliance with the approved Plan for that development.
- G. If any non-compliance remains unresolved, the Developer/Marketing Consultant will be required to discard all current applications and re-market the development.