

HUDSON HOUSING AUTHORITY FAIR HOUSING MARKETING PLAN FOR STATE ASSISTED HOUSING

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HUDSON HOUSING AUTHORITY (HHA) FAIR HOUSING MARKETING PLAN FOR STATE ASSISTED HOUSING

INTRODUCTION

The Hudson Housing Authority (“HHA”), its Board and staff are responsible for implementing federal and state civil rights laws that affect the admission, occupancy, and procurement of services for the HHA. This Fair Housing Marketing Plan applies to the HHA’s state assisted public housing.

I. FEDERAL FAIR HOUSING LAWS¹

A. The Fair Housing Act (Title VIII of the Civil Rights Act of 1968)

As amended, prohibits discrimination in the sale, rental, and financing of dwellings based on race, color, religion, sex, familial status, national origin, or disability.

B. Title VI of the Civil Rights Act of 1964

Prohibits discrimination based on race, color, or national origin in any program or activity receiving federal financial assistance.²

C. Age Discrimination Act of 1975

Prohibits discrimination based on age in any program or activity receiving federal financial assistance.

Exceptions may apply when age is used as part of criterion for a program that has a statutory age limit or is otherwise statutorily authorized.

¹ This is not intended to be an exhaustive list. A brief summary is provided for each law.

² “Program or activity” under Title VI, Section 504 of the Rehabilitation Act, and the Age Discrimination Act noted above means “all the operations” of the covered recipient of federal financial assistance.

D. Section 504 of the Rehabilitation Act of 1973³

As amended, prohibits discrimination against persons with disabilities in any program or activity receiving federal financial assistance.

E. Title II of the Americans with Disabilities Act

Prohibits discrimination against person with disabilities in all services, programs, and activities of state and local public entities.

F. The Architectural Barriers Act of 1968

Requires buildings and facilities that are constructed by or on behalf of the United States, or leased by the United States, or buildings financed in whole or in part by a grant or loan made by the United States, to be accessible to persons with disabilities.

II. MASSACHUSETTS FAIR HOUSING LAW

A. M.G.L. c. 151B

Prohibits discrimination on the basis of race, color, religious creed, national origin, sex, age, ancestry, genetic information, veteran/military status, sexual orientation, gender identity, marital status, presence of children, disability or receipt of public assistance, including housing subsidies in the sale, rental, or lease of covered dwelling units, including publicly assisted dwelling units.

B. Massachusetts Equal Rights Law (M.G.L. c. 93, § 102)

Provides that all persons within the Commonwealth of Massachusetts, regardless of sex, race, color, creed, or national origin, shall have equal rights to make and enforce contracts, and to inherit, purchase, lease, sell, hold, and convey real and personal property.

³ “Program or activity” under Title VI, Section 504 of the Rehabilitation Act, and the Age Discrimination Act noted above means “all the operations” of the covered recipient of federal financial assistance.

C. Article CXIV of the Massachusetts Constitution

Provides that “no otherwise qualified handicapped individual shall, solely on the reason of his handicap, be excluded from the participation in, denied the benefits of, or be subject to discrimination under any program or activity within the Commonwealth.”

D. M.G.L. c 121B, § 32

Prohibits discrimination and segregation in HHA-operated housing on the basis of race, color, creed, religion, blindness or physical handicap.

III. FAIR HOUSING MARKETING PLAN

This Fair Housing Marketing Plan (“FHMP”) is adopted in accordance with the federal and state laws listed above, as well as state-aided public housing regulations at 760 CMR 4.07. Pursuant to 760 CMR 4.07, the HHA shall biennially determine whether the percentage for each minority group in the HHA’s state housing by program (i.e., elderly/handicapped program and family program) is significantly below⁴ the percentage for the minority^{5[4]} group in the city or town or in the general population of the applicable metropolitan statistical area (“MSA”), whichever is greater, and, if so, shall update and implement this FHMP to ensure affirmative outreach to the minority group.

The HHA has an ongoing responsibility to ensure that people in the local city or town, the primary MSA, and the communities from which applicants have historically applied for

⁴ For this purpose, “significantly below” means that the percentage for each minority group in the HHA’s housing for a given program is at least one percentage point below the percentage for the minority group in the city or town or in the general population of the applicable MSA, whichever is greater. For example, if Asian households comprise 5% of residents in the HHA’s Chapter 667 housing, but 6% or more of the population in the city or town or the applicable MSA, whichever is greater, the percentage in the HHA’s housing would be deemed “significantly below”.

⁵ “Minority” has the meaning assigned to it in 760 CMR 5.03: *Definitions*.

housing are aware of the availability of units and given an opportunity to apply. The HHA shall initiate a marketing effort whenever any of the following situations occur:

- a. the HHA's minority tenant population is significantly (a difference of one percentage point or more) below the percentage for the minority group in its City/Town or general population of the MSA, whichever is higher;
- b. the waiting list, including available MRVP vouchers, is less than the number of applicants anticipated to be placed in the next 12 months;
- c. applications for new programs or units covered by this FHMP will be accepted; or
- d. the overall minority household population (where at least one household member is a minority) is less than the HHA's Affirmative Action Goal adopted pursuant to 760 CMR 5.10(3)⁶.

⁶ If the percentage of Minority tenant households in the HHA's state-aided housing by program is not significantly below (greater than 5 percentage points) the percentage for Minorities in the general population, *the HHA currently meets its Affirmative Action Goal for that program*. See PHN 2021-14.

IV. DEMOGRAPHICS OF THE CITY AND METROPOLITAN STATISTICAL AREA

Race/Ethnicity	% General Population, Hudson	% General Population Boston Metro Area	% HHA State Elderly/ Handicapped Resident Population
Black or African-American	1.1	8.2	2
Asian	2.7	8.4	0
Native Hawaiian or Pacific Islander	0	0	0
American Indian or Alaskan Native	0	0	0
Hispanic or Latino	5.8	11.9	2

Conclusions:

The HHA Elderly/Handicapped assisted housing population is within 1% of or exceeds the % of the general population for Hudson town, Massachusetts MA or the Boston Metro Area for Native Hawaiian, Pacific Islander and American Indian or Alaska Native minority groups pursuant to the PHN 2022-03 analysis.

There is an over 1% differential in the HHA Elderly/Handicapped assisted housing population as compared to the general population for the greater of the Boston Metro Area (whichever is greater) for the following minority groups Black or African American, Asian and Hispanic or Latino. Thus, the marketing efforts relative to these groups will be a priority to the HHA. This analysis is performed pursuant to the guidance in

V. MARKETING CONTENT – GENERALLY

A. Marketing for HHA units will provide information, maximum opportunity, and otherwise attract eligible persons protected under federal and state fair housing laws who are less likely to apply.

B. When undertaking marketing efforts, the HHA shall utilize the following advertising methods as determined best suited for the particular circumstances:

i. Advertisements will be posted on the HHA's website in all threshold languages or with the appropriate language advisory, as determined by the HHA's Language Access Plan adopted pursuant to 760 CMR 4.02(1)(e).

ii. The HHA maintains a web site with clear information about availability, eligibility, and application processes to inform applicants about housing opportunities at the property- especially those who have difficulty calling or visiting during business hours. Specifically, the website provides a link to the CHAMP application process. The HHA may also post on social media accounts where applicable.

iii. Partnership with community contacts throughout the market area are an effective tool for reaching potential applicants who have limited internet access, limited English proficiency, or who may otherwise require assistance in applying. As appropriate, advertisements will be shared with the local fair housing commission, area religious institutions, local and regional housing agencies, civic groups, social services agencies, and other local community organizations, which may include the following:

- Hudson Council on Aging
- Senior Center
- Commission on Disability
- Hudson Public Library
- South Middlesex Opportunity Council
- Disabled American Veterans.
- Seven Hills Foundation
- The Bridge of Central Ma.
- YMCA
- Boys & Girls Clubs of America
- Open shky Community Services
- Grace Church
- First Methodist Church
- Lepd Pentecostal
- Seventh Day Adventist Church
- Sri Shirdi Sai Baba Temple
- Islamic Center if Boston, Wayland
- Congregation Shaarei Zedeck, Clinton
- Domestic Violence Services Network

Examples of other agencies for consideration may include regional Housing Consumer Education Center, area Housing corporations, area Continuum of

Care, area Independent Living Center, GLAAD, United Way, area domestic violence agencies, and local community colleagues.

The HHA may modify this list as additional groups become available to serve those least likely to apply.

iii. When a waiting list is initially opened or closed and then reopened, or otherwise deemed appropriate by the HHA, advertisements will be placed in the digital or print versions of local and regional newspapers, examples of such may include:

- Hudson Community Advocate
- Boston Globe/Boston Herald
- MetroWest Daily News
- Lowell Sun

iv. When a waiting list is initially opened or closed and then reopened, or otherwise deemed appropriate by the HHA advertisements will be placed in the print versions of non-English publications (in the language of the publication) based on the prevalence of particular language groups in the regional area, examples of such publications may include:


- Sampan and/or
- Bay State Banner and/or
- El Mundo and/or
- El Planeta and/or
- The Brazilian Times, and/or
- Vocero Hispano, and/or
- El Pueblo Latino, and/or
- Journal, and/or

- Thang Long

v. Advertisements will also be disseminated by flyers and postings in public places and may also be placed on the local access cable channel. Such placement may include:

- WMTC Marlborough
- Bolton Access TV
- HUD TV

vi. New Units will be reported to the Boston Fair Housing Commission's MetroList if and where applicable.

- C. Materials being used for advertisements direct potential applicants to the online application at CHAMP and indicate that paper applications may be downloaded and printed out from the DHCD website or picked up at the management office of any local housing authority. Applicants may also request that the HHA send them an application by mail.
- D. Application information prepared by the HHA will include a statement regarding the HHA's obligation not to discriminate in the selection of applications.
- E. The size of the advertisements, including the content of the advertisement, as well as the dates of the advertising, will be comparable across regional, local, and minority newspapers.
- F. Where applicable, the local residency preference for state assisted housing will not be advertised so as not to discourage non-local potential applicants.
- G. The Fair Housing logo () and slogan ("Equal Housing Opportunity") will be included in all marketing materials. All marketing will be comparable in terms of the description of the opportunity available and the dates of marketing,

regardless of the marketing type (e.g., local newspaper vs. minority newspaper).

- H. All marketing will offer reasonable accommodations in the application process.

VI. SPECIAL EFFORTS TO ATTRACT MINORITY APPLICANTS

- A. When the statistical data indicates the need to perform advertising to a particular minority group due to underrepresentation, the HHA will ensure that the specific resources named herein which are intended to reach the underrepresented population are included in the marketing effort. (i.e. for current purposes the data indicates Black or African American, Asian and Hispanic or Latino underrepresentation in Elderly/Handicapped Housing and the organizations contracted for outreach will include those which work with these communities.) Further, where applicable emphasis will be placed on translation of advertisements for underrepresented minority groups in their LEP languages where applicable.
- B. In addition to local and regional newspapers, where appropriate under this plan, advertisements may be placed in newspapers that serve minority groups and other groups protected under fair housing laws, these may include:
- Sampan and/or
 - Bay State Banner and/or
 - El Mundo and/or
 - El Planeta and/or
 - Brazilian Times and/or
 - Vocero Hispano and/or
 - El Pueblo Latino and/or
 - Jornal, and/or
 - Thang Long

Not all of the publications above will be utilized. At the time of marketing, the HHA may amend and update this list to ensure that newspaper serving those least likely to apply are to be utilized to assist with Fair Housing marketing efforts. The HHA will maintain data as to which publications were utilized.

Notices will also be sent to organizations to ensure affirmative outreach to under-represented minority groups identified in accordance with 760 CMR 4.07, these may include:

- Massachusetts Center for Native American Awareness, and/or
- Massachusetts Coalition for the Homeless, and/or
- Catholic Charities, and/or
- Greater Boston Interfaith Organization, and/or
- BMA Tenpoint, and/or
- Refugee and Immigrant Assistance Center, and/or
- Massachusetts Alliance of Portuguese Speakers, and/or
- Somali Development Center, and/or
- Vietnamese American Initiative for Development (VietAID), and/or
- The Asian American Civic Association, and/or
- Casa Esperanza, and/or
- Haitian Multi-Service Center, and/or
- La Alianza Hispana, and/or
- Massachusetts Commission on Indian Affairs, and/or
- METCO, and/or
- Massachusetts Office on Refugees and Immigrants, and/or
- The NAACP.

It is possible that not all of the above organizations will be utilized. The HHA will ensure that organizations serving those least likely to apply as identified herein are utilized to assist with Fair Housing marketing efforts.

VII. OUTREACH EFFORTS TO PERSONS WITH DISABILITIES

- A. HHA will conduct outreach efforts directed towards persons with disabilities by providing a listing of accessible units to the Hudson Commission on Disability and MassAccess (<http://www.massaccesshousingregistry.org>) or a successor website/registry in accordance with M.G.L. c. 151B, § 4(7A).
- B. All marketing will offer notice of reasonable accommodations in the application process. The HHA will also upon request provide application materials in alternative formats, engage in alternative means of communication through auxiliary aids and services, and/or provide assistance with the application process as necessary to ensure that persons with disabilities are reasonably accommodated and have equally effective access to the HHA's programs.

VIII. LANGUAGE ASSISTANCE FOR APPLICANTS WITH LIMITED ENGLISH PROFICIENCY

Marketing informational materials will provide notice of free language assistance to applicants, this notice of the availability will be translated into the languages of Limited English Proficiency ("LEP") populations anticipated to apply in accordance with the HHA's Language Access Plan.

IX. MARKETING TIMELINE

- A. When required under this policy, advertisements will run annually a minimum of two times.
- B. All advertisements will be designed to attract attention.
- C. The Housing Authority will maintain a copy of the advertisement and the dates published as well as any marketing materials sent for distribution, including the name of the agency to which it was sent and the dates sent to said agency.

X. PLANS FOR CORRECTING NEGATIVE PROCEDURES OR POLICIES

The HHA also reviewed City and Metropolitan Area census data aggregate minority populations to determine compliance with the HA's affirmative action goal pursuant to state regulations.

Elderly/Handicapped State Aided Housing

The applicable statistics indicate that the HHA serves less families in which one member identifies as a minority (4.5%) in its Elderly/Handicapped housing than the aggregate percentage of minority population 55 and over in the MSA (18.2%) and the Town of Hudson (4.0%) in its State Assisted Elderly Disabled Public Housing Program. The comparative analysis used is that set forth by DHCD in PHN 2021-14. There is a 14.2 percentage differential between the HHA's Elderly/ Handicapped housing and the Affirmative Action Goal of 18.2% and as such the HHA will adopt a 1 in 5 (20%) minority placement rate.

The affirmative action preference in placement serves to result in selection of applicants with at least one Minority household member for a unit of appropriate size in accordance with the highest preference category within the highest priority category of general applicability. The HHA will house applicants through CHAMP based on their priority, preference and application date and use the Minority Preference filter in CHAMP as a tool to ensure that progress towards its Affirmative Action Goal is being made. The placement rate pertains to the extent of the affirmative action preference only and is not intended, and shall not be applied, as a limit on the number of Minority households that should be offered housing.

Additionally, the HHA will continue with its efforts to ensure that the HHA continues to affirmatively further fair housing by engaging in the marketing efforts addressed herein. The HHA will market to those considered least likely to apply as described herein with a current

emphasis on ensuring that there is adequate marketing to Black, Asian, African American Hispanic and Latino communities including where applicable such LEP communities.

XI. MONITORING EFFECTIVENESS AND UPDATES AND STAFF TRAINING

- A. Applicable Staff will be informed of the contents of the FHMP. All staff receive training on Fair Housing.
- B. This FHMP will be reviewed every on a biennial basis and updates if needed as a result of changes to the area population, resident population or both.
- C. Residents and applicants are requested to provide demographic information in which applicants may disclose race ethnicity and disability status. This information is maintained in the HHA's system and reports can be run in aggregate form.

XII. POSTING

The FHMP will be posted in the development office together with the appropriate language advisory and a copy of the State and Federal Fair Housing poster.