

RESOLUTION NO. 355

WHEREAS, the City Council of the City of Alexandria supports the policy of equal housing opportunities for all Alexandrians regardless of race, color, religion, national origin, sex or marital status; and

WHEREAS, the City Council has continually expressed its policy of non-discrimination in housing and employment through the passage of numerous resolutions and ordinances and the establishment of fact-finding citizen boards and committees; and

WHEREAS, the City's Housing Availability Code, passed in 1968 and amended in 1973 and 1974, has been employed as one means of combatting discrimination in housing; and

WHEREAS, although a strong and necessary tool, the case by case approach prescribed by the Housing Availability Code is not totally effective at eliminating discriminatory actions or discriminatory effects in housing; and

WHEREAS, affirmative action plans for the housing and home finance industry have been recognized as additional tools for combatting discrimination in housing; and

WHEREAS, the U.S. Department of Housing and Urban Development is encouraging the development and implementation of voluntary affirmative plans between local governments, community groups and the housing and home finance industry; and

WHEREAS, the Metropolitan Washington Council of Governments, with the participation of staff from the City of Alexandria, has developed and adopted a Guide Fair Housing Affirmative Action Plan; and

WHEREAS, the City of Alexandria's Housing Availability Board has officially endorsed the Guide Plan and has outlined an implementation program to accomplish the goals and objectives of the Guide Plan,

NOW, THEREFORE, BE IT RESOLVED that

1. The City Council hereby endorses the purpose, goals and methods of implementation set forth in the Guide Fair Housing Affirmative Action Plan as amended in accordance with the memorandum of November 22, 1974 from Larry Clark, Chairman, Housing Availability Board to Robert D. Bauerlein, Director, Office of Community Services and Captioned: Guide Fair Housing Affirmative Action Plan; and
2. The City Manager and the Housing Availability Board, or a successor agency are hereby authorized to seek voluntary affirmative action agreements with the housing and home finance industry; and
3. The housing and home finance industry are encouraged to work with City staff in accomplishing the goals set forth in the Guide Plan; and

4. The Housing Availability Board or a successor agency and the City Attorney report back to the City Council by April of 1975 proposals for changes in local legislation or administrative practices which would enable the City to work more effectively toward the goals of the Guide Plan; and
5. The Housing Availability Board or a successor agency submit progress reports on implementation of the Guide Plan to the City Council in January and June of 1975.
6. This resolution expresses the sense of Council, that this particular program appears to Council to be one which lends itself to implementation on a regional basis and a request that the Manager, the Housing Availability Board of the City of Alexandria or a successor agency and the city's representatives on the Northern Virginia Planning District Commission, explore the possibility of implementation on a Northern Virginia Regional basis with the other Virginia jurisdictions.

Adopted: November 26, 1974

Beverly Snedeker Acting City Clerk

M E M O R A N D U M

DATE: NOVEMBER 22, 1974
TO: MR. ROBERT D. BAUERLEIN, DIRECTOR, OFFICE OF COMMUNITY SERVICES
FROM: LARRY CLARK, ¹⁹⁸CHAIRMAN, HOUSING AVAILABILITY BOARD
SUBJ: GUIDE FAIR HOUSING AFFIRMATIVE ACTION PLAN

The Guide Fair Housing Affirmative Action Plan is, as the name suggests, a "guide" for local governments' affirmative action efforts, and a "plan" or strategy for gaining acceptance for those policies deemed necessary to promote open housing. Therefore, local governments are free to amend specific provisions of the Plan to meet local needs and accomplish local goals.

Since the Plan was introduced to City Council on November 11, a number of discussions have taken place concerning specific provisions which might be amended or eliminated entirely to adapt the Plan to Alexandria's use.

Among the amendments suggested are the following:

1. On page 12, change the statement to read "use of human models in an integrated setting wherever practical."
2. On page 16 under Individual Firm Actions, add a statement after the first sentence to the effect that: "This should not be construed to mean that a quota system must be employed."
3. On page 27, delete the entire third paragraph.
4. On page 28, change the first statement to read: "use of otherwise qualified contractors and minority individuals by all firms under contract to the local government."
5. On page 46, section 8, add to the statement, "except in the case of an unmarried couple."

6. On page 47, section 13, change the statement to read: "An application should be considered in the context of an individual's overall record and not allow a record of convictions to provide the sole basis for rejection."
7. On page 48, section 5, add a statement to the effect that: "Records should be made available in statistical form and no specific data on each applicant will be required."
8. On page 48, delete section 24.
9. At the beginning of the agreement with each individual firm add a statement to the effect that: "None of these agreements shall conflict with any local, state or federal law."

These specific changes approved by the Housing Availability Board and others which may be suggested by City Council will go far toward adapting this excellent plan to use in Alexandria.

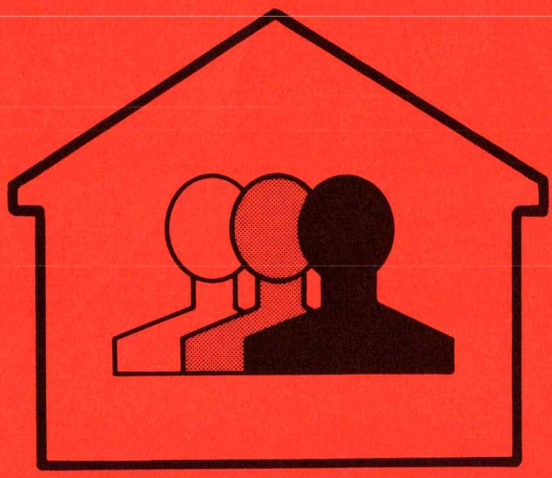
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GUIDE
FAIR HOUSING
AFFIRMATIVE ACTION PLAN
JULY 1974



**METROPOLITAN WASHINGTON
COUNCIL OF GOVERNMENTS**

FAIR HOUSING AFFIRMATIVE ACTION PLAN:

A GUIDE FOR THE
WASHINGTON METROPOLITAN AREA

The preparation of this report was financed in part through a comprehensive planning grant from the Department of Housing and Urban Development under provisions of Section 701 of the Housing Act of 1954, as amended, and in part under the provisions of Title IV of the Intergovernmental Personnel Act of 1970.

METROPOLITAN WASHINGTON COUNCIL OF GOVERNMENTS
1225 CONNECTICUT AVENUE, N.W.
WASHINGTON, D.C. 20036

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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|---------------------------------------------------|------------------------|------------------------------|
| BIBLIOGRAPHIC DATA SHEET | | 1. Report No. | 2. | 3. Recipient's Accession No. |
| 4. Title and Subtitle Fair Housing Affirmative Action Plan: A Guide for the Washington Metropolitan Area | | 5. Report Date July 1974 | | 6. |
| 7. Author(s) Patricia A. Heinaman | | 8. Performing Organization Rept. No. | | |
| 9. Performing Organization Name and Address Metropolitan Washington Council of Governments 1225 Connecticut Avenue, N.W. Washington, D.C. 20036 | | 10. Project/Task/Work Unit No. | | 11. Contract/Grant No. |
| 12. Sponsoring Organization Name and Address Metropolitan Washington Council of Governments 1225 Connecticut Avenue, N.W. Washington, D.C. 20036 | | 13. Type of Report & Period Covered Final 1974 | | 14. |
| 15. Supplementary Notes | | | | |
| 16. Abstracts This document presents a voluntary affirmative action program designed to insure equal housing opportunity for all residents of the Washington Metropolitan Area. The program outlined is intended to serve as a prototype for implementation by local governments in cooperation with the U.S. Department of Housing and Urban Development, representatives of the housing industry and financial institutions, and public and private interest groups. Specific recommendations are set forth regarding actions to be taken by each of the suggested participants, and prototype voluntary agreement forms are included. | | | | |
| 17. Key Words and Document Analysis. 17a. Descriptors Equal Housing Opportunity Fair Housing - Affirmative Action Housing - Planning and Policies Balanced Communities | | | | |
| 17b. Identifiers/Open-Ended Terms | | | | |
| 17c. COSATI Field/Group | | | | |
| 18. Availability Statement | | 19. Security Class (This Report) UNCLASSIFIED | 21. No. of Pages 60 | |
| | | 20. Security Class (This Page) UNCLASSIFIED | 22. Price | |

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PREFACE

The lack of equal opportunity in housing for residents in the Washington Metropolitan Area has been of vital concern to the Council of Governments for a number of years. Shortly after the enactment of Title VIII of the Civil Rights Act, which established the Federal Fair Housing Law, COG took its first major action in encouraging expanded housing accessibility by adopting a Guide Fair Housing Ordinance for enactment by local jurisdictions. Subsequently, many of the local governments in the metropolitan area adopted fair housing legislation based upon COG's Guide Ordinance.

The Guide Fair Housing Affirmative Action Plan represents the second major undertaking of the Council of Governments in the field of fair housing. In 1973, COG established an ad hoc task force to examine the status of equal housing opportunity and to develop a comprehensive metropolitan-wide approach to increasing housing choices in the Washington Metropolitan Area. This task force is composed of executive directors and staffs from local and State fair housing boards and human relations commissions, and includes representatives of the Washington, D.C. HUD Area Office and the Housing Opportunities Council of Metropolitan Washington.

In addressing potential mechanisms for improving equal access to housing, the task force analyzed a number of strategies being utilized throughout the country, focusing particularly upon the affirmative marketing program being implemented through the U.S. Department of Housing and Urban Development (HUD). In accordance with the Affirmative Fair Housing Marketing Regulations adopted by that Department in 1972, developers of federally assisted or insured housing projects are required to make specific efforts to market these units in such a way as to reach all population groups in the housing market area. Since January, 1973, HUD has also strongly encouraged not only builders and developers but representatives of other sectors of the housing and home finance industry to develop joint areawide affirmative marketing programs to provide a more comprehensive approach to expanding housing choices. A number of large firms in San Diego, California and Dallas, Texas have offered to cooperate with HUD in this endeavor and have entered into voluntary Areawide Affirmative Marketing Agreements with the Department. In addition, HUD is now negotiating with other groups throughout the country for this purpose.

Recognizing the usefulness of this program, the task force determined to base its efforts on a similar but somewhat more comprehensive strategy by expanding upon the program's basic principles to include all transactions involved in the rental, sale and financing of housing units, and by developing a program which could be implemented on a voluntary basis through adopted local governmental policies. The specific recommendations for action included in the Guide Fair Housing Affirmative Action

Plan are based both on the research and findings of the task force, and on comments and suggestions made by representatives of the housing and home finance industry in response to issues discussed at a special workshop held in March of 1974.

SUMMARY

The Guide Fair Housing Affirmative Action Plan presents a comprehensive metropolitan strategy for providing all residents of the Washington Metropolitan Area an equal opportunity to obtain housing on a non-discriminatory basis. Designed to cover the rental, sale and financing of all housing, the Guide Plan promotes the concept of equal housing accessibility regardless of the race, color, religion, national origin, sex, marital status or age of home and apartment seekers, including the presence and number of children in these households. To accomplish this goal, the Plan outlines a cooperative action program to be undertaken jointly by local governments, professional associations and individual firms of the housing and home finance industry, the U.S. Department of Housing and Urban Development (HUD), and public and private interest groups throughout the metropolitan community.

Part I of the Plan outlines the conceptual framework of the metropolitan fair housing affirmative action effort, and provides background information regarding the need for the development of this strategy in the Washington Metropolitan Area. The remaining portions of the Guide Plan, Parts II, III and IV, describe the recommended responsibilities, actions and implementation procedures which could be undertaken by each of the suggested participants. For members of the housing and home finance industry, these activities cover the advertising of available housing and related services, training and employment of personnel, and use of general office procedures to process applications. Recommended participation by HUD and local governments, acting both collectively through the Metropolitan Washington Council of Governments (COG) and individually includes the development or expansion of programs designed to assist both the industry and the consumer in achieving the goal of equal housing opportunity.

The action plan for professional associations and individual firms of the housing and home finance industry is also summarized and included in separate Guide Fair Housing Affirmative Action Agreements, attached as an appendix to the Guide Plan. The Guide Agreements are designed to serve as a prototype of the form of agreement which can be negotiated between individual local jurisdictions, members of the housing and home finance industry and HUD, indicating the intended compliance of the industry with the recommendations outlined in the Guide Plan, and the commitment of the appropriate local government and HUD to provide assistance in implementing the affirmative action program.

Following consideration and adoption of the Guide Plan by the COG Board of Directors in 1974, local governments will be encouraged to adopt the Plan for use in their communities, or alternatively to adopt a locally sponsored plan based upon the COG Guide Plan. In addition, local jurisdictions will be encouraged to develop the necessary implementation and monitoring

techniques to fulfill the objectives of the affirmative action program. Members of the housing industry will be encouraged to work with the local jurisdictions, HUD and public and private interest groups to further implement this strategy through the adoption of Fair Housing Affirmative Action Agreements similar to the Guide Agreements included in the COG Plan.

RATIONALE AND FRAMEWORK FOR AFFIRMATIVE ACTION

Status of the Equal Housing Effort

The U.S. Civil Rights Commission stated in its first report about ten years ago, that "housing seems to be the one commodity in the American market that is not freely available on equal terms to everyone who can afford to pay." Unfortunately, this situation still holds true today for many of the persons seeking housing in the Washington Metropolitan Area.

Lack of equal access in housing is in part the result of actions formulated with the actual intent of discrimination. Some people continue to discriminate despite the fact that the majority of such actions are now forbidden by Federal, State and local fair housing laws. A second problem area at present is the use of practices and procedures which, through the creation of arbitrary standards, criteria and guidelines, have the effect of denying equal access in housing. Many of these practices and procedures preclude certain persons from applying or qualifying for housing, yet do not have a firm basis in terms of actual business necessity.

An additional constraint to accomplishing the equal opportunity goal has developed as a result of the past roles of the housing industry and financial institutions in perpetuating racial segregation and restricting the eligibility of applicants. Due to these previous actions, many persons believe that their housing needs will receive unfavorable treatment. This perception of discriminatory treatment can be a deterrent equal in effectiveness to a blatant discriminatory act.

Statistical Indicators

One obvious indicator of the lack of equal accessibility to housing in the Washington Metropolitan Area is exhibited in the current distribution of white and non-white households. The proportion of non-white families in this area has remained relatively constant at 25 percent of the population for the last fifty years, although these households were much more evenly distributed throughout the individual jurisdictions in the past. Today, non-white families reside mainly in the District of Columbia, portions of Prince George's County, and in older communities of the metropolitan area. In 1970, 86 percent of the metropolitan area's non-white population lived in the District of Columbia and Prince George's County alone. Between 1960 and 1970, the proportion of non-white households living in suburban jurisdictions increased from 6 percent to almost 8 percent, reversing a downward trend that has been in effect since 1900.

It is important to note, however, that over 72 percent of this increase occurred in Prince George's County, which indicates that only minimal progress has been made in the metropolitan area as a whole.

While comparative data for other sectors of the population are not readily accessible, various studies conducted both here and throughout the country have indicated that additional members of the population also lack full and equal access to housing within their economic means as a result of their sex, marital status and age. For example, a survey conducted in 1972 by the Federal Home Loan Bank Board, the regulatory agency for federally insured savings and loan associations, provided evidence that the practice of discounting all or part of a working wife's income in determining mortgage loan eligibility is widely used. In addition, this survey showed that many savings and loan associations include applicants' marital status as a factor in evaluating loan applications, and some use it as grounds for automatic rejection. Information contained in a survey undertaken by the United States Savings and Loan League also indicated that a number of firms use standards relating to the maximum age of applicants in a way which precludes consideration of the actual loan repayment capability of many persons more than forty years old.

Fair Housing Legislation

In April, 1968, Congress enacted Title VIII of the Civil Rights Act of 1968, establishing the Federal Fair Housing Law. This law prohibits discrimination based on race, color, religion or national origin in connection with the sale or rental of most housing and any vacant land offered for residential construction or use. In so doing, the law specifically outlines certain actions as being "discriminatory," and provides for a formal complaint and enforcement process to protect against such actions. In addition, it directs the Secretary of the United States Department of Housing and Urban Development and all executive departments and agencies to administer "programs and activities relating to housing and urban development in a manner affirmatively to further the policies of this [Act]..."

Two months after the enactment of Title VIII, the Supreme Court strengthened the framework of the equal housing effort through its interpretation of the Civil Rights Act of 1866. In the landmark case of Jones v. Mayer,* the Court reviewed the 1866 Act which provides that:

All citizens of the United States shall have the same right...as is enjoyed by white citizens...to inherit, purchase, lease, sell, hold, and convey real and personal property.

* 392 U.S. 409 (1968).

In its decision on this case, the Supreme Court ruled that the Civil Rights Act of 1866 does, in fact, bar "all racial discrimination, private as well as public, in the sale or rental of property."

In 1971, the Supreme Court expanded the concept of equal opportunity in its decision on the case of Griggs v. Duke Power Company,* stating that practices, procedures and tests which have the effect of restricting equal access to employment cannot be used, except in the case of compelling business necessity. Since that time, lower courts have applied this principle in the field of housing. For example, in the 1972 case of U.S. v. Real Estate Development Corporation,** a District Court determined that the defendant had illegally discriminated on the basis of tenant selection standards. Paraphrasing the Griggs decision, the Court indicated that "practices with discriminatory consequences are prohibited, irrespective of the defendant's motivation."

The Federal Fair Housing Law and the Supreme Court decision in Jones v. Mayer provided the basis for initiating a comprehensive effort to insure equal opportunity in housing. In the five years since these actions were taken, additional fair housing legislation has been adopted by both State and local governments in this metropolitan area, as indicated in Appendix B. Many of these ordinances were modeled after COG's Guide Fair Housing Ordinance. These laws carry penalties ranging from injunctive relief to monetary damages. The fair housing laws and court decisions have greatly assisted in promoting equal housing opportunity, but their impact has been somewhat limited due to the emphasis upon use of the individual complaint process as an enforcement mechanism. Therefore, additional and more comprehensive action is needed.

Framework of the Guide Plan

Purpose and Goals

The intent of the Guide Fair Housing Affirmative Action Plan is to initiate a voluntary metropolitan-wide affirmative action effort to complement the existing Fair Housing laws and to expand the accessibility of all housing to all residents of the Washington Metropolitan Area. The affirmative action program outlined in this Plan includes not only those efforts required by law, but additional actions which can assist in better achieving equal housing opportunity. The specific goals of the Guide Plan are:

- To insure the availability of all housing on a non-discriminatory basis, including the elimination of

* 401 U.S. 424 (1971).

** 347 F. Supp. 776 (N.D. Miss. 1972).

"institutional" practices which tend to be discriminatory in effect.

- To inform minority residents of the availability of housing in areas in which they might not ordinarily look for housing, and to encourage them to seek housing in such areas.
- To educate the entire metropolitan community as to: everyone's right to live wherever he or she chooses, and the desirability of heterogeneous communities; and
- To develop mechanisms through which progress toward these goals can be systematically measured.

Scope of Coverage

The affirmative action effort included in this Guide Plan is directed toward insuring the availability of housing to all persons in the Washington Metropolitan Area, regardless of their race, color, religion or national origin. In addition, however, the Plan is designed to promote equal accessibility to housing for all persons regardless of:

- sex;
- marital status; or
- the age of potential residents,
- including the number and presence of children.*

An exception to non-discrimination on the basis of age is provided for those dwelling units designed for occupancy exclusively by elderly persons.

In providing guidelines for the type of activities which could be carried out to further the affirmative action program, the following actions and practices are included in the Guide Plan, as they relate to the rental, sale and financing of all housing:

- advertising, marketing and office procedures;
- the training and employment of all personnel in the housing and home finance industry; and
- assistance and enforcement programs which can be developed, continued or expanded upon by local jurisdictions, HUD and public and private interest groups.

* Inclusion of this factor does not negate the minimum requirements relating to occupancy standards contained in appropriate zoning and health or housing code ordinances.

Each of the actions covered is included due to its importance in influencing the way in which business is carried out, and therefore the potential for expanding equal housing opportunity.

This Plan is intended to cover all dwelling* units in the metropolitan area, including:

- single and multifamily units;
- sales and rental dwellings; and
- new and existing housing.

Participating Parties

Successful implementation of the Guide Plan's objectives requires the active involvement of local jurisdictions working both through COG and individually; associations and individual members of the housing industry and financial institutions; the Department of Housing and Urban Development; private and public interest groups; and members of the metropolitan community.

"Members of the housing and home finance industry" refers to all individuals, institutions, groups or organizations, including builders; real estate brokers and salespersons; rental and property managers; and public and private financial institutions which rent or sell housing, provide funds for home loans or guarantee home loans. The term "housing and home finance industry" is used through the body of the Guide Plan to denote all firms and professional associations of firms engaged in one or more of these practices.

Duration

The Guide Fair Housing Affirmative Action Plan will be officially available for review and action by local jurisdictions upon adoption by the Council of Governments' Board of Directors, as will the appended Guide Fair Housing Affirmative Action Agreements, which provide a mechanism for implementing the objectives contained in the Guide Plan. The Guide Plan and Agreements will remain in effect as a prototype program until such time as substantial amendment or revision is recommended.

* "Dwelling" is defined as any building, structure, or portion of such which is occupied as, designed, or intended for occupancy as a residence by one or more families, and any vacant land offered for sale or lease for construction or location of any building, structure or portion thereof.

HOUSING AND HOME FINANCE INDUSTRY PARTICIPATION

The involvement and cooperation of the housing and home finance industry is integral to the success of the affirmative action program. A number of firms in the Washington Metropolitan Area have already evidenced initiative in furthering fair housing goals, and have encouraged others to follow their lead. The development of a strategy involving the participation of all sectors of the industry, as well as increased coordination among industry representatives, HUD, local governments and private citizens, could expand these efforts beyond their present limitations and result in the establishment of coordinated policies and a comprehensive program in this area.

The role of the housing and home finance industry in this effort should encompass work in a number of fields, including implementation of affirmative action in the areas of advertising, training and employment, and office procedures used in the financing, sale and rental of dwelling units. Establishment of an innovative affirmative action program covering the range of activities recommended in this Guide Plan could increase the business potential of individual firms and the industry as a whole by:

- improving the public image of the housing and home finance industry, thereby reducing the reluctance of some persons to apply for housing or for mortgage loans;
- expanding the market by providing more information to more people regarding the availability of resources;
- achieving increased consumer expertise regarding the applicant standards to be met; and
- reducing the number of discrimination complaints filed due to a lack of understanding of standard business practices and procedures.

Similarly the development of a system to maintain and make available data on characteristics of applicants will enable the industry to document its efforts in the field of fair housing. The availability of such data can allow a firm to provide tangible evidence of its business policies, and can be particularly useful if a discrimination complaint is filed against it.

The mechanism for establishing an industry-wide program of this nature already exists in the present structure and organization of the housing and home finance industry. The majority of firms handling a significant portion of the housing market in the Washington Metropolitan Area belong to professional industry organizations and associations, such as area real estate boards, apartment management associations, and organizations

of savings and loan associations. These professional associations are in a unique position to coordinate the efforts of their individual members, to develop model programs and to provide assistance in sponsoring special projects. In fact, some associations currently perform this role for their members in the area of fair housing. For example, the Prince George's County Board of Realtors recently adopted a Housing Opportunity and Affirmative Action Plan to promote equal housing practices, and established a Housing Opportunities Committee to coordinate its efforts to implement its affirmative action program.

In light of the important role which professional industry associations can undertake to further the affirmative action effort, a major portion of the suggested coordinative activities contained in this Plan are recommended to be carried out by these groups, while the more specific actions related to daily business activities are recommended to be undertaken by individual firms. Except as specifically indicated, these guidelines are applicable to all members of the housing and home finance industry as defined in Part I of this Plan. The techniques and procedures included in this portion of the Guide Plan should not be interpreted to be exclusive of alternative approaches which may prove more effective in meeting the equal opportunity goal. Rather, the plan of action contained in Part II is designed to serve as a prototype of a feasible program which can achieve positive results. Some of the various elements included will require long-range planning and coordination, while others can be implemented relatively rapidly.

The Guide Fair Housing Affirmative Action Agreements included in Appendix A of this Plan provide a mechanism for both professional associations and individual firms to publicly commit themselves to working toward the equal housing opportunity goal. The Guide Agreements incorporate the actions recommended to be undertaken by representatives of the housing and home finance industry, and can be used as a vehicle by the professional associations and firms to reach voluntary agreements with local jurisdictions and HUD regarding the responsibilities and actions to be carried out in the affirmative action program.

A D V E R T I S I N G

Advertising techniques and practices determine to a large degree both the number and type of customers initially attracted to a particular apartment complex, housing development or lending institution. For example, those firms which depend largely upon word-of-mouth advertising will probably attract many applicants who are either friends or relatives of existing clients, while those firms which advertise in the minority media and in media with a metropolitan-wide audience will most likely attract a range of potential customers with widely diversified backgrounds and characteristics.

In recognition of the impact of advertising practices and content upon consumers in the housing market, the U.S. Department of Housing and Urban Development (HUD) issued special Advertising Guidelines for Fair Housing on April 1, 1972, encouraging the use of the Equal Housing Opportunity logo and slogan as well as other practices designed to assure all persons of their equal access to housing. Since that time, equal opportunity logos and slogans have been promulgated for use by lending institutions in addition to real estate firms, apartment management companies and home developers.

Although many firms operating in the Washington Metropolitan Area are currently making efforts to advertise in accordance with the intent of HUD's guidelines, additional work is needed to insure that all households are equally informed of available housing and related resources. In addition to the specific actions indicated below, there are two universal principles which should be adhered to by all members of the industry in their advertising production. First, the housing and home finance industry should work to insure that fair housing and heterogeneous communities are portrayed in a positive light in all literature and advertising developed by both the associations and individual firms. For example, when human models are used in advertisements, these models should be displayed in an integrated setting. Second, and equally important, the industry should strive to make extensive use of minority media and media with a large minority audience as well as media with a large majority audience in all types of advertising sponsored. A listing of some minority media resources in the Washington Metropolitan Area is included in Appendix C.

Industry Association Actions

A comprehensive advertising program to effectively reach all members of the metropolitan community should be initiated by the industry associations to promote both the principles and practice of equal housing opportunity to the general public. This program could be developed through the use of a number of techniques which the industry currently uses to promote other programs and projects. At the same time, the associations can begin work to assure that individual members of the housing industry itself are also aware of fair housing objectives, the practices which can be used to promote fair housing and affirmative action, and the means by which these techniques can be most effectively implemented.

Use of the Media

One readily available vehicle for initiating an affirmative action advertising effort is through the use of the local media. A good public service advertising campaign utilizing both majority and minority media resources can initiate the associations'

efforts in this area, and could be started relatively quickly. The public service message should address not only the issue of fair housing, but the associations' role in promoting equal housing opportunity throughout the metropolitan area.

There are a number of ways in which this public service advertising work can be complemented. One method could consist of a paid advertising campaign with a similar format as the public service effort. This could be used either as an alternative advertising approach or as a supplement, in the event that a public service advertising effort cannot be fully developed. Since a paid advertising campaign will require approval of the allocation of association funds for this purpose, more time will probably be needed to initiate an effort of this type. Another technique which would not require expenditure of association funds is the development of a series of news articles to be prepared by the industry association for publication which could include, for instance, information about the metropolitan-wide nature of this effort and any locally adopted plans, as well as a statement of the association's resolve to implement the various elements of the affirmative action program.

In all newspaper advertisements sponsored by industry associations to promote the principles and goals of equal housing opportunity which include the use of human models, these models should be displayed in an integrated setting. The use of models in advertisements such as these can serve to reinforce the readers' concept of the association's policies by visually portraying heterogeneous communities in a positive manner, and therefore can be a particularly effective technique.

Special Marketing Efforts

Special mechanisms are needed to assist potential customers in adequately identifying all available housing resources throughout the metropolitan area, and the associations have the potential to aid in coordinating this effort on a large scale. One strategy which could be implemented with relative ease could entail the sponsorship of paid advertisements by *builder*, *realtor* and *realist* associations, publicizing the principles of equal housing opportunity and announcing the opening or continuation of specific sale or rental housing units. This could be done on a rotating basis, for example, with six or ten member firms participating each week, through:

- newspaper advertisements;
- direct mailing of flyers to minority as well as majority area zip codes;
- radio announcements; and
- bus advertisements.

In addition, *builder*, *realtor* and *realist* associations could assist in establishing "Showcases of Homes" and mobile sales

offices in convenient locations throughout the metropolitan area, such as shopping centers, and particularly in areas with a large minority audience. A more long-range program which could be undertaken by the associations, as well as by their individual members, would be to begin working with the Council of Governments to establish a centralized file containing information on potential housing resources in the Washington Metropolitan Area. Representatives of the industry could begin work on a joint project of this nature by transmitting copies of advertisements for new subdivisions and apartment complexes to COG for placement in a comprehensive listing.

Adherence to Equal Opportunity Guidelines

The display of the Equal Housing Opportunity logo and slogan, or the appropriate equivalent, as well as the Equal Employment slogan, provides a quick indicator of the fair housing and employment policies of a given association or firm. Many persons are still unfamiliar with the meaning and intent of the Equal Housing Opportunity logotype, and therefore the associations should work to devise techniques for increasing this awareness. For example, the associations could include a display of the logo with an explanation of its symbol on billboards or in its public service advertising campaign.

To reaffirm the commitment of industry associations to the concept of open housing, and in observance of HUD's Advertising Guidelines for Fair Housing, the logotype should be used in all printed association advertisements, and in the associations' monthly publications, and should be displayed proportionate in size to other logotypes used in these materials. It is also very important that either fair housing slogans or the logo be used in industry-sponsored radio and television advertisements. In addition, the appropriate associations should inform member firms of their individual obligations to advertise in accordance with the Advertising Guidelines for Fair Housing, issued April 1, 1972, included in Appendix D of this Plan.

Individual housing and home finance industry associations can further assist in this effort by encouraging their member firms to use a logo proportionate in size to other writing on the following types of signs:

- *builder* associations - construction site signs;
- *builder and realtor/realist* associations - "for sale" signs; and
- *apartment management* associations - "vacancy" signs.

The prominent display of Equal Housing Opportunity logos on these signs will assure potential customers that they can expect fair and equal treatment from the firms advertising these units.

Internal Communication

The use of internal lines of communication between the associations and individual firms is very important in providing member firms with information regarding the associations' policies toward open housing and the affirmative action program. The associations should make use of all internal advertising techniques available to them, such as monthly publications or internal memos, to convey information to their members on the status of the metropolitan-wide affirmative action program, and all implementation steps which are being taken. This process will provide the associations and firms an opportunity to coordinate their activities on a continuous basis, as well as to keep advised of new strategies or techniques being utilized.

Community Contacts

Community-wide understanding of all facets of the Guide Fair Housing Affirmative Action Plan, and of the housing and home finance industry's role in implementing the Plan, is essential to the fulfillment of the Plan's objectives. The associations should actively seek to assist in informing citizens of the principles of the Guide Plan and their own role in implementing the Plan through the use of speaking engagements before community groups throughout the metropolitan area. To facilitate this process, the associations might consider establishing speaker's bureaus, from which trained individuals could be made available.

These attempts should not only bring about heightened community awareness of the Guide Plan and locally adopted plans, but can also help to increase the lines of communication and understanding between the community and housing and home finance industry members. In addition, the associations should view their opportunities to meet with community groups and private fair housing groups as a vehicle for conveying and disseminating information on available housing resources. The establishment of ongoing lines of communication between the industry and community groups will require some degree of coordination and planning, but with the assistance of the appropriate agencies in local governments throughout the metropolitan area, this effort can be quickly initiated.

Individual Firm Actions

Although industry associations can perform an important function in coordinating the affirmative advertising effort, the advertising guidelines and practices used by individual firms in their daily contact with the public will ultimately

serve to reinforce the equal opportunity concept. To insure that this in fact occurs, individual firms should:

- adhere to the HUD Advertising Guidelines for Fair Housing;
- display the fair housing poster, or its appropriate equivalent and the equal employment opportunity poster in all rental, sales and lending offices, and in model homes;
- make extensive use of minority media, particularly radio and newspapers, as well as majority media resources;
- include the Equal Housing Opportunity slogan, or its appropriate equivalent, in all radio and television advertisements;
- display the Equal Housing Opportunity logo proportionate in size to other writing on all signs indicating current or future availability of specific housing units;
- use human models in an integrated setting only, if models are displayed in advertisements, particularly brochures; and
- mail to both minority and majority neighborhoods when direct mailing is used as an advertising technique.

Since all of these activities are integral to the business practices currently utilized by individual firms, no great difficulty should be encountered in their implementation. In addition, however, the firms should work with their appropriate professional associations to assist in their affirmative action advertising efforts, and to coordinate joint approaches.

T R A I N I N G

An employee's perception of his or her firm's fair housing policies, as well as the impact of fair housing legislation on his or her job, is influential in determining the way in which business activities are conducted. Every employee undergoes some type of informal or formal training during his or her career which assists in shaping and reinforcing that individual's perception of the work role, and consequently of the fair housing practices adhered to by a specific firm. One way to promote a better understanding of the relationship between the principles of fair housing and the daily activities of the housing and home finance industry is to incorporate this subject into the curriculum of all existing training and orientation programs. Although all firms do not have a formalized training program which can

be used for educational purposes, most firms have some form of orientation program for new employees which serves this purpose, and company policies and practices are also passed on and reinforced to all employees during daily discussions regarding implementation of specific work tasks.

Since the impact of fair housing legislation directly affects the work of almost all employees, discussions of this subject comprise an important portion of information needed by each individual to conduct business in an approvable fashion, and in such a way as to most equitably respond to the need of the firm's clients. Access to adequate information on equal housing goals and policies can provide each employee the opportunity to be responsive both to legislative requirements and the reputation of his or her firm. In light of the many new developments occurring in the field of fair housing, the provision of a comprehensive training program on this subject has increasingly become not only an employer's responsibility, but an employee's right.

Industry Association Actions

Industry associations have an important part to play in the fair housing and affirmative action training effort. Serving as information clearinghouses, the associations can develop model training programs in the area of fair housing, incorporating both information which should be conveyed to all employees and effective teaching techniques. Some industry associations, such as the Northern Virginia Board of Realtors, have already developed general training programs which are operated under the association's auspices for employees of member firms. Where such a mechanism already exists, the addition of a comprehensive course in fair housing which could be developed jointly with the Council of Governments and appropriate agencies of local jurisdictions could easily be accomplished. Those associations which do not currently operate programs of this nature could work both with COG and local jurisdictions and with other associations to develop a curriculum which could be used by member firms.

To complement these training programs, the associations should assist in working with the appropriate local, State and Federal agencies to provide member firms with a supply of training materials and information on fair housing legislation and relevant court cases. With the cooperation of these agencies, this task could be carried out quickly, and would be highly beneficial to member firms. The associations could also determine at this time the need to develop supplemental materials, and could initiate efforts to do so if such action appears warranted. In addition, the associations can review and evaluate the effectiveness of materials and techniques currently being used in member firm's training programs, and offer advice and assistance to members upon request.

Individual Firm Actions

Responsibility for insuring that training in the areas of fair housing and affirmative action is effective also lies with the individual firms. To meet this obligation, firms should conduct special sessions during the orientation of new employees as well as ongoing formal and informal fair housing discussions with their entire staff. These sessions should include the following at minimum:

- an analysis and interpretation of Federal, State and local laws as they pertain to the firm's operations;
- use of methods to sensitize employees to the special needs of many of the households in the metropolitan area, e.g., minority applicants and female heads of households, and the best means of dealing with these needs in an affirmative manner;
- a discussion of the need to avoid the use of procedures and practices which have been shown to have a discriminatory effect; and
- a clear statement of the individual firm's policies toward open housing and the affirmative action effort.

Discussions of these subjects can be readily incorporated into the daily business practices of any firm, although each firm should also be aware and take advantage of any programs and materials made available through its professional association.

E M P L O Y M E N T

The composition of a firm's staff not only affects the manner in which business is transacted, but influences the general public's image of that firm, and thus reflects to some degree both its fair housing and equal employment opportunity policies. A lack of diversity in a company's staff, including both professional workers and office support personnel, may influence an applicant's perception of his or her potential for receiving equal treatment, and in doing so may limit that firm's capacity to tap all markets throughout the community.

Special efforts are needed to increase the employment of individuals currently under-represented in the work force, and particularly minority group personnel. The development and continuation of special recruitment efforts, such as the American Bankers Association Minority Applicant Referral Service, would serve to reinforce the commitment of individual firms and the industry as a whole to the equal opportunity goal, as well as to expand business horizons. To the degree that these programs can assist in making all housing resources

more accessible to the general public in a friendly and open atmosphere, it is essential that additional efforts be initiated to expand equal employment opportunities in the housing industry beyond their current level.

Industry Association Actions

The associations should provide special assistance to member firms which have attracted very few employees from minority groups, and should aid all of their members in seeking qualified and qualifiable applicants from minority groups and other groups presently under-represented in the work force. This assistance should be geared not only toward the hiring of professional workers, but toward the entire range of employment opportunities including management, sales, supervisory, technical and clerical jobs. One way in which the associations could support this effort is through the establishment of job banks and special referral services which include listings of all positions available in member firms, and the names of appropriate personnel contacts for each position. The creation of job banks will require a considerable amount of time and extensive coordination between the associations and their member firms, but can serve as extremely valuable resources to the industry as a whole.

An additional resource which can easily be developed with the assistance of appropriate local agencies is a listing of recruitment sources from which the associations' member firms may obtain the names of potential job applicants from groups presently under-represented in the housing and home finance industry. Efforts can also be initiated to develop fellowship/internship programs to aid in attracting and training minority personnel, especially those persons who may otherwise encounter difficulties in entering a specific profession. Although such programs will need to be carefully planned and coordinated they can be particularly effective, and especially so for *realtor* and *realist* associations in light of the time, funds and expertise required to become a salesperson. The associations should also encourage member firms to examine their current recruitment efforts to insure that these programs are directed toward all segments of the population.

In establishing these programs and resources, the associations should make positive efforts to attract the membership of minority firms into their organizations. In addition, each association should promote the use of clear, non-discriminatory policies by member firms in terms of hiring practices, to insure that all employees are subject to the same work rules, rights, privileges, responsibilities and disciplinary procedures.

Individual Firm Actions

Each firm should take immediate steps to integrate its work force and insure that its staff composition is representative of all segments of the population. Initially firms should examine the recruitment techniques used to attract job applicants, particularly in the area of advertising, to determine whether these techniques should be expanded. All advertising for employment should conform to the principles stated earlier, i.e., it should be placed in both minority and majority media resources, and it should convey the concept that all jobs are available on an equal opportunity basis. The Equal Employment Opportunity slogan should be prominently displayed in all such advertisements.

As additional recruitment mechanisms are developed by the professional industry associations, individual firms should also take advantage of these, including the use of a listing of recruitment sources. In addition, all firms should support the efforts of their appropriate associations by assisting in the development of job banks, and providing and updating job information on a continuing basis. Each firm should also provide openings for participants in association-sponsored fellowship or internship programs.

F I N A N C I N G / H O M E P U R C H A S E A N D R E N T A L P R O C E D U R E S

The process through which an individual applicant receives or is denied a home loan or rents an apartment is a somewhat confusing one to many persons. This is often due in part to the variety of procedures which are used by the various members of the housing and home finance industry in processing a request or application. The general public is relatively unfamiliar with many normal business practices, and most persons are reluctant to question techniques being used, even if they feel they are not receiving satisfaction. A review and standardization of these procedures to insure uniform treatment of all customers, as well as the provision of explanatory materials to clients regarding these procedures, could assist in streamlining business and customer relations. In addition, this effort would help to insure that unnecessary complaints are not filed against firms due to a client's lack of knowledge about standard business practices.

Many clients are also confused by the variety of standards and criteria used by different firms to evaluate their applications, especially when a customer's application is accepted by one firm and rejected by another. In addition, many of the review standards commonly used to evaluate applications may inadvertently tend to favor certain types of applicants over others. For example, those standards

which are applied in determining "effective income" may tend to have a discriminatory effect upon minority groups and low and moderate income households if a firm adheres to a policy of discounting or excluding certain types of income.

In a recent policy statement, the Federal Home Loan Bank Board addressed this issue by providing guidelines to its member institutions regarding the development and implementation of loan underwriting practices which are non-discriminatory in effect as well as intent. In addition, the Board recommended that non-discrimination in lending be practiced on the basis of age, sex, and marital status as well as race, color, religion and national origin, and urged member institutions to re-examine their policies periodically to insure equal opportunity. A re-evaluation and standardization of the criteria used to evaluate both home loan and rental applicant qualifications would not only assist in insuring equal opportunity, but may aid potential clients in determining more precisely the standards which they must meet, and could increase the total number of acceptable applications. To this end, the development and adoption of uniform procedures and review processes throughout the various sectors of the housing and home finance industry would be mutually beneficial to both consumers and the industry itself.

Industry Association Actions

Industry associations should provide overall guidance and aid to coordinate a review of the status of their firms' practices and procedures. One of the first steps to be taken by the associations in this process should be an attempt to designate and standardize those criteria which best measure an applicant's ability to afford housing. Several professional associations, such as the United States Savings and Loan League, have already developed suggested standards to be used in the evaluation process. Increased efforts to identify and standardize appropriate criteria to be used in applicant evaluation throughout the housing and home finance industry will of necessity take considerable time and effort, but could ultimately result in the establishment of uniform evaluation standards which would assure all applicants fair and equal treatment.

An additional approach to be undertaken is the review and analysis of all business forms currently used by member firms in determining applicant eligibility, to insure that the criteria used are directly related to an applicant's ability to afford the housing, as well as sound business practices.

The associations could also initiate work to develop model application forms of varying types which reflect the use of standardized criteria, and could recommend the use of these forms to all member firms. In addition, the associations

could attempt to devise forms which would provide a means of expediting the application process, such as a "short" apartment application form to assist in immediately notifying a potential tenant of his or her eligibility. As is the case with the review of business forms presently in use, these latter efforts will all require a reasonable amount of time for planning and coordination prior to implementation.

One technique which could be encouraged by the associations and put into effect relatively rapidly, however, is the development of all applications to their fullest potential. A fair number of applications are probably rejected due to the fact that sufficient time has not been spent in explaining to the applicant all of the documentation which could be used to enhance his or her eligibility, or because the rental agent, sales person or loan officer has made a "stereotype" judgement of an applicant based on preliminary information. Since these actions can result in a loss of business to an individual firm, as well as the loss of housing to the applicant, the associations should actively encourage all members to work closely with each applicant to insure that all pertinent information is available and considered fully.

Individual Firm Actions

Individual firms should not only assist the associations in their efforts to standardize application forms and eligibility criteria, but should actively work toward streamlining their own office procedures. Many persons who believe they have received unfavorable or discriminatory treatment are simply victims of poor business practices. The development of uniform policies and procedures at the individual firm level will help to eliminate this type of occurrence and will also assist in providing more equal access to housing opportunities.

Availability of Resources

One of the best ways to insure that all applicants are informed of all available resources is to maintain a single unified list of housing units, and to establish written procedures regarding:

- who may or may not give information on the availability of housing units; and
- when and by whom a given housing unit is taken off the list.

All applicants must have equal access to complete information, including all information accessible through the use of a multiple listing service. Similarly, all prospective mortgage

applicants should be informed of all of the various forms of financing and insurance available. For those firms or employees of firms such as resident managers of apartment complexes already utilizing a single unified listing of resources, these recommended procedures can be rapidly put into effect. Other firms, however, may require substantial lead time for adequate preparation.

Application Policies

Many potential clients are unaware of the application policies of a specific firm at the time they apply for assistance. These policies should be clearly explained to each potential customer, with all restrictions clearly pointed out. This process is a very simple one, but it can help to avoid problems at a later date. To complement this practice, uniform procedures regarding the use of security deposits and imposition of special fees should be developed and explained to the applicant at the time the initial request is made.

Evaluation Criteria

As previously noted, many different criteria are used to evaluate applications, and the use of these criteria can vary even with a single firm, depending upon their interpretation by individual employees. Each firm should work with its appropriate association to re-evaluate, revise and standardize these criteria to insure that each applicant has an equal opportunity for approval of his or her application. These criteria should then be uniformly applied to all applicants. Information to be reviewed should be objective in nature, relating to income, employment and past rental history in the case of rental applicants, with the addition of a credit check for home loan applicants.

Most importantly, all income should be counted in evaluating an applicant's ability to afford housing, regardless of source, when it is documented that this income is regularly earned or received.* This would include the following as well as other sources of income:

- the entire income of a wife;
- income from other household members;
- child support;
- alimony;

* Federal, State and local housing assistance program requirements regarding income computations preempt the recommendations contained in this Plan.

- part-time income;
- overtime income;
- social security and private retirement benefits;
- Veteran's benefits;
- workman's compensation and disability benefits;
- and
- welfare payments.

In addition, credit evaluation procedures should be uniformly applied to all *home loan* applicants, with emphasis placed on the applicant's recent credit record. As stated in the above referenced Federal Home Loan Bank Board policy statement: "An isolated experience in the distant past should not be a ground for denial of a loan if subsequent experience and present circumstances indicate stability."

Two questions which have often been asked of applicants in the past are those which address the issues of marital status and birth control. In light of the changing role of women in society, these factors have become increasingly less relevant to the ability of a specific household to afford a given housing unit, and information regarding these factors should not be requested or considered in evaluating an application for either a rental unit or a home loan.

It is also very important that a degree of flexibility be accorded in consideration of factors such as an applicant's employment record. Each applicant's work record should be carefully evaluated to determine whether frequent job changes are due to poor work habits or to an attempt to obtain better employment.

An additional factor which should receive careful consideration is an applicant's police record. Some firms have indicated that a record of either arrests or convictions can result in the automatic rejection of a client's application. In fact, an arrest record does not provide proof of criminal activity, and should not be included at all in the evaluation of an applicant's qualifications for purchasing a home or renting an apartment. Similarly, a record of convictions should not serve as automatic grounds for rejection of an application, but should be carefully weighed in light of the applicant's other qualifications, the past or recent nature of the record, and the degree of seriousness of the conviction(s).

Notification of Acceptance/Rejection

In many cases, applicants must wait for a lengthy period of time prior to being notified of the status of their applications. To avoid such delays, firms should rapidly institute procedures to facilitate this procedure. All applications should be processed as expeditiously as possible, and all applicants should be notified of the time period within which

a decision regarding acceptance or rejection of the application will be made. In the event that a final decision on an application cannot be reached within that time period, applicants should be notified of this fact and informed of the status of their applications.

Appeal Mechanisms

Although the passage of the Fair Credit Reporting Act of 1970 provides an opportunity for consumers to obtain information regarding the contents of their personal credit reports, this fact is not widely known. Each firm should immediately insure that all applicants rejected on the basis of a credit report are informed of the provisions of this Act, of the source of the credit report, and of their right to contact the appropriate credit bureau to review and obtain clarification of the contents of the report. In addition, an adequate appeal mechanism should be established to provide a 30-day period following the rejection of a home loan application within which an applicant may request reconsideration based upon the submission of adequate documentation. To avoid the filing of complaints which may be erroneously lodged against management, procedures should also be instituted to notify all applicants for rental housing of the reasons for rejection of their applications.

Waiting Lists - Rental Only

The use of applicant waiting lists for rental housing can assist in making these resources available on an equal opportunity basis, while providing an effective management tool for individual firms to insure continued occupancy. Waiting lists should be established for all rental housing, and should be utilized for tenant selection as units become available. The development of standardized procedures for use of waiting lists would certainly assist in this process. For example, one way in which waiting lists could be expeditiously established, maintained and updated on a regular basis would be to require potential tenants to renew their interest once a month. Each potential tenant could then be informed of his or her status on the waiting list both at the time the application is filed and during the monthly contact.

Many firms currently have extensive waiting lists which tend to discourage minority applicants from applying for housing. Those firms which have not previously solicited minority applicants and which presently have long waiting lists should consider giving minority households preference in obtaining rental units in order to correct past imbalances and actively encourage an expansion of housing opportunities.

Occupancy Limits - Rental Only

Many rental offices and management firms currently adhere to a policy of restricting the size and composition of households eligible to rent a unit of a given size, and do so much more stringently than is required by local zoning, health and housing code ordinances. For example, a number of firms which manage apartment complexes containing predominantly two-bedroom units refuse to rent to families with any children or with more than one child. This practice, which appears to be particularly prevalent during periods of high rental demand and low vacancy rates, poses a particular hardship for families with children, and can severely limit their opportunity to obtain housing within their financial capabilities. All rental and management firms which currently restrict applicant eligibility in this manner should re-examine these policies and revise them to provide a more equal opportunity for households with children to live in housing suited to their size, needs and resources.

Appraisal Techniques - Home Loan/Mortgage Only

The appraisal process, in which the value of a house is determined, has often in the past been defined as an art rather than a science. Appraisal procedures are becoming more scientific, however, and should be further standardized and strengthened to insure that all homes are evaluated in an equitable fashion, regardless of the racial character of the neighborhood in which the property is located and regardless of the applicant's race, religion, color, national origin, sex, marital status and age. It is also vitally important that the practice of redlining, or refusing to give an appraisal or loan for properties in designated neighborhoods, not be applied and that arbitrary and unequally applied home design or structural requirements not be utilized. In addition, the appeal processes for unsatisfactory appraisals should be clearly explained and made available to each applicant.

Pre-Screening - Home Loan/Mortgage Only

In many cases, builders and realtors pre-screen applicants to determine their eligibility to receive a home loan, and then refer these applicants to a specific lending institution. All *lending institutions* which receive loan applications by referral should insure that the pre-screening of such applicants is done on a non-discriminatory basis. In addition, *lending institutions* which enter into contractual arrangements with developers to provide mortgage loan commitments to individual purchasers in specified housing units should insure that all screening of these applicants is done in an affirmative manner.

R E P O R T I N G

The maintenance and reporting of data on the characteristics of persons who apply for housing or mortgage loans can, as noted in the introduction to Part II, be highly beneficial to the industry. This is not to suggest that the industry should develop or maintain a recordkeeping system to include confidential information which would violate either individual or entrepreneurial rights and privileges, but rather that some be utilized to provide data on general applicant characteristics. Unless information of this nature is collected and made available, it is not possible for the industry to adequately evaluate its effort to achieve equal housing opportunity, let alone indicate to the public the results of its efforts in this field. Several different sectors of the housing and home finance industry are already participating in a recordkeeping process of this nature.

A number of firms in the Washington Metropolitan Area are currently utilizing the reporting procedures developed by the Department of Housing and Urban Development to monitor the success of individual Affirmative Marketing Plans submitted in accordance with regulations issued in 1972 for use in all projects with five or more units receiving HUD insurance or assistance. In addition, owners of all rental residential dwellings with twenty-five or more units located in Montgomery County are covered under a locally adopted recordkeeping and reporting system. It should be noted that multifamily reporting requirements similar to Montgomery County's have also been enacted by the States of New Jersey and Kentucky. As of June 1, 1974, lending institutions in the Washington Metropolitan Area will also be maintaining records on their applicants under a pilot project instituted by the Federal Home Loan Bank Board, the Comptroller of the Currency, the Board of Governors of the Federal Reserve System, and the Federal Deposit Insurance Corporation. The types of data gathered through these various reporting systems are similar, but not identical, and major portions of the industry are presently not included in these efforts.

The cooperation of the housing and home finance industry in voluntarily working with the appropriate local, State and Federal agencies to develop and provide information from a comprehensive, standardized reporting system would not only assist all participants in evaluating the success of the affirmative action program, but would provide a clear indication of the industry's commitment to the affirmative action effort. In light of the importance of this program, implementation efforts should be initiated as quickly as possible.

Industry Association Actions

The associations have the potential to organize and coordinate the establishment of a standardized reporting system by consulting with both their members and appropriate local, State and Federal government representatives. After the content and format of the procedures have been jointly approved, the associations could continue to coordinate this effort by requesting their members to supply them with the data agreed upon on a regular basis. Information obtained from member firms could be organized by the associations both in a summary fashion for the total membership, and in a more detailed manner to indicate trends within individual firms. The associations could then forward this information on a quarterly basis to the appropriate local jurisdictions, to COG, and to the Washington, D.C. HUD Area Office and other appropriate Federal agencies.

Individual Firm Actions

The role of individual firms in establishing an ongoing reporting system is key to the success of the effort. Ideally, all data on the characteristics of applicants should be maintained by race, sex and marital status, and geographical information should also be included to indicate the location of sales and rental housing involved by neighborhood. Each firm could maintain this data in relationship to the following types of indicators:

Management Firms - by race, sex and marital status:

- total number of tenants;
- total number of units rented;
- total number of applicants and/or number of applicants on waiting list; and
- estimated annual turnover.

Builders and Real Estate Brokers - by race, sex and marital status:

- total number of applicants for home purchase;
- total number of homes sold, by type of applicant; and
- sources of home listings.

Lenders - by race, sex and marital status:

- total number of applications for home loans;
- total number of home loans granted; and
- number of applications denied, by category.

THE ROLE OF LOCAL GOVERNMENT

Local governments, working in concert with HUD and the community, can supply the major impetus for implementation of the Guide Plan's objectives. Acting both collectively through the Council of Governments and individually, the local governments of the metropolitan area can furnish official endorsement of the affirmative action program, as well as strengthen existing policies and programs in support of this effort. As a second step, local governments can seek to enlist the participation of the housing and home finance industry in the program and encourage industry representatives to enter into fair housing affirmative action agreements such as the Guide Agreements contained in Appendix A. More detailed actions recommended in this Plan to be undertaken by local governments focus upon the development and use of specific techniques which can further assist both the industry and the consumer in achieving the goal of equal housing opportunity.

I M P L E M E N T A T I O N P R O G R A MCOG Actions

The Guide Fair Housing Affirmative Action Plan is scheduled for review and adoption by the COG Board of Directors in 1974. Prior to the adoption of the Plan, COG can begin to seek funding to enable it to serve as a metropolitan-wide forum for ongoing discussion and coordination of this effort among representatives of local governments, the housing and home finance industry, concerned citizens and public and private interest groups. To further facilitate implementation, COG can attempt to obtain additional funds to provide staff assistance for liaison and evaluation activities, technical assistance, and the development of more tools and programs to aid both the industry and consumers in expanding housing opportunities through affirmative action.

Local Government Actions

Upon adoption of the Guide Plan by the COG Board of Directors, local governments will be encouraged to adopt and officially endorse the COG Guide Plan or a locally developed Plan based upon the COG Guide for use in their individual jurisdictions. Each local government could then actively begin to work out affirmative action programs with representatives of the housing and home finance industry, and to enter into agreements such as those included in Appendix A. The cooperation and participation of public and private interest groups in these negotiations

I N D U S T R Y C O O R D I N A T I O N
A N D I M P L E M E N T A T I O N

Following the adoption of the Guide Plan by the COG Board of Directors, members of the housing and home finance industry will be called upon to endorse the Plan, and to begin working with both COG and local jurisdictions to implement its objectives. The various professional associations and member firms will be encouraged to enter into negotiations with the local jurisdictions and HUD to adopt Affirmative Fair Housing Action Agreements similar to the COG Guide Agreements included in Appendix A.

To effectively implement the objectives of the Guide Plan, however, it will be necessary for both associations and individual firms to develop a coordinated strategy. Responsibility for the implementation program should be placed with a high-ranking individual or committee within each firm and association. The person or committee so designated should not only work to expedite implementation, but to monitor and evaluate the success of the program, and provide information to the local jurisdiction, COG and HUD on a regular basis regarding the status of the effort. A special set-aside of funds should also be established to assist in paying for the expenses of carrying out the affirmative action program. Housing and home finance industry associations should coordinate these programs not only with their member firms, but with other firms active in the metropolitan area, including minority members of the industry.

should be solicited by each local jurisdiction. Local governments will also be encouraged to develop supporting implementation and monitoring techniques which could provide an opportunity for each jurisdiction to establish a direct relationship between its affirmative action policies and the housing industry's activities, as well as to assist in informing its citizens of the impact of the affirmative action program.

There are a number of options available to local governments in establishing programs of this type, although the methods which can be utilized will vary among the jurisdictions due to differences in existing laws and enabling legislation. As noted in the introduction to this Plan, almost all of the jurisdictions in the metropolitan area have enacted local fair housing legislation. The strict enforcement of existing fair housing laws should serve as a prerequisite to implementation of the affirmative action program. Some jurisdictions' fair housing ordinances may already contain provisions which might be used to promote the objectives of the affirmative action effort. In other jurisdictions, these ordinances could be strengthened or administrative regulations issued to include specific requirements for affirmative action and the establishment of mechanisms to more effectively evaluate the housing industry's efforts. In analyzing their laws for this purpose, local jurisdictions could also attempt to amend their fair housing ordinances to provide greater uniformity in this legislation throughout the metropolitan area. State assistance and enabling legislation should be sought as needed to complement these efforts.

Additional techniques which can be utilized to support this effort include the use of the Guide Plan or locally adopted plan in all conciliation agreements, and the evaluation of all housing and related applications forwarded under the A-95 Project Notification and Review System for conformance with the local government's affirmative action objectives. (This latter process will be somewhat more difficult in the future than it has been in the past, due to the deletion of the requirement for submission of Affirmative Marketing Plans with initial housing applications forwarded under the A-95 review process.)

Local governments could also encourage and monitor affirmative action efforts by establishing reporting requirements such as those adopted in Montgomery County, or by establishing licensing procedures for members of the housing industry, with license approval contingent upon evidence of effort in this area. In addition, local jurisdictions could request information regarding the policies and practices of individual firms as they appear before the local governments for approval of rezoning, for the review of site plans, or for the issuance of building permits.

Individual local jurisdictions can also initiate work toward the development of an affirmative action program to be used in all transactions between the local government and the private business community, as well as in all locally sponsored housing programs, including:

- the use of minority contractors and minority individuals by all firms under contract to the local government;
- the deposit of local government funds in institutions which participate in the local plan; and
- participation in the local affirmative action plan as it relates to the local provision of housing resources.

The content, implementation and effectiveness of the local affirmative action plan should be evaluated on an ongoing basis, and the results of this evaluation should be made available by the appropriate local agency. Adequate funds and personnel will be needed in order to accomplish this task and to provide the services outlined below.

T E C H N I C A L A S S I S T A N C E

The development of a viable affirmative action program can best be facilitated through the sharing of ideas and techniques which prove particularly effective, and through the provision of assistance in the implementation of these techniques. Local governments have the opportunity to assist not only the housing and home finance industry but other local jurisdictions in their endeavors to implement either the Guide Plan or locally adopted plans.

COG Actions

As the information clearinghouse for the Washington Metropolitan Area, COG is in a unique position to provide technical assistance to both local jurisdictions and members of the housing and home finance industry participating in the affirmative marketing effort, provided that sufficient funding is available for this purpose. Through its sponsorship of the Guide Plan, COG can provide information and materials regarding both the Plan and the goals of equal opportunity and affirmative action to all interested parties, and can assist in generating publicity on these issues.

In addition, COG can provide added support to the affirmative action effort by working with all participants to develop effective metropolitan-wide implementation mechanisms. For example, COG could work with representatives of local governments, HUD and the housing and home finance industry to develop a fair housing training curriculum which might be used by the industry or could be offered as a special program through COG's Metropolitan Training Institute. COG could also work with these groups to

publish detailed guides relating to advertising and business practices. To coordinate materials and data forwarded in the housing and home finance industry's reporting process, COG could assist in compiling and evaluating the data provided to local jurisdictions on a metropolitan scale, and could distribute summaries of this information to all appropriate parties throughout the area. COG could also assist individual local jurisdictions in developing special monitoring techniques to assess the degree of adherence to the affirmative action program.

Local Government Actions

To further promote the ideals of fair housing, and publicize the local affirmative action plan, local governments could sponsor or co-sponsor advertising efforts in conjunction with the housing and home finance industry. Such efforts would clearly indicate the local jurisdictions' commitment to the locally adopted Plan, as well as the intent of the housing and home finance industry to comply with the Plan.

The individual jurisdictions could also provide all participants with advice in developing materials and programs to implement the local plan and assist in monitoring the effectiveness of these techniques and efforts. For example, the local governments could encourage their staffs to assist in developing training materials and identifying employee recruitment sources for use by the industry. In addition, local staffs could assist the housing and home finance industry in making contacts with community organizations and private fair housing groups to encourage greater interaction among these groups, and could help to develop additional strategies in this area, as needed. By participating in this process, local governments would also have the opportunity to suggest alternative implementation mechanisms if some prove more successful than others.

REFERRAL / INFORMATION COUNSELING

Many persons are not only unfamiliar with their rights regarding equal opportunity in housing, but have little or no knowledge about available housing resources. Local governments could implement their efforts to promote the concept and meaning of equal housing opportunity by providing their constituents with information on specific housing resources located within their communities. In addition, materials could be provided describing the procedures used by the housing and home finance industry to process loans and approve applications, so that potential applicants can be made fully aware of the requirements to be met in obtaining the type of housing they desire.

COG Actions

One of the most effective ways to insure that all persons in the Washington Metropolitan Area are fully informed of the housing resources available would be the establishment of a metropolitan-wide housing information system. COG is currently preparing a proposal to develop a data source of this type to include information on all sales and rental units in the area, and has just completed publication of a computerized file containing data on all federally assisted and public housing throughout the region. The expansion of this computer file to include all dwelling units in the metropolitan area could serve as an extremely valuable tool for apartment and homeseekers by providing information on all housing by size, location, cost and amenities. Used in conjunction with the principles of the Guide Fair Housing Affirmative Action Plan, this information system could greatly assist in expanding the public's perception of housing accessibility.

The establishment of the housing information system by COG is contingent upon the provision of adequate funding by the Federal Government. In the meantime, however, COG can make available copies of the Subsidized Housing Information File for use by local jurisdictions throughout the area, and can continue to provide all other relevant information to both local jurisdictions and community groups for their use in referral and counseling. In addition, if adequate funding is provided, COG could assist in developing a resource listing of consumer-oriented guides to the housing market, explaining the terminology as well as procedures used by the housing and home finance industry.

Local Government Actions

Local government can aid in the above effort and contribute to the resources available to their citizens by developing special referral and information systems which contain specific information regarding the jurisdiction's housing stock. A number of jurisdictions have already worked on projects of this nature, and have participated in the development of local "homeseeker's guides." In addition to updating information currently available, the individual jurisdictions could assist COG in the development of a metropolitan housing information file if adequate funding is made available for this program.

To complement the availability of information on housing resources, local governments could initiate special counseling programs through existing or newly created agencies to provide residents with guidance and assistance

in obtaining housing. These agencies could also work with citizen organizations and public and private fair housing groups to provide information and materials for distribution in the community. The affirmative action effort cannot be successful unless there is an increased perception of all housing resources available and the methods for obtaining these resources, as well as an understanding of the program's intent.

PART IV

HUD INVOLVEMENT

The ongoing efforts of the Department of Housing and Urban Development in the area of fair housing have served as a motivating factor in the development of the Guide Fair Housing Affirmative Action Plan. Following adoption of the Guide by the COG Board of Directors, HUD will be solicited to provide formal endorsement of this approach to expanding equal access to housing. HUD will also be requested to sustain its funding of COG under the 701 Comprehensive Planning Program for continuation of ongoing implementation efforts on a metropolitan-wide basis. In addition, HUD's assistance will be sought in identifying available funds both from within that Department and from other appropriate sources to provide an opportunity for initiation of more comprehensive efforts, such as coordination and monitoring of the reporting system outlined in Part III of this Plan.

Another major step which HUD should consider in support of the innovative approach to fair housing recommended in this Guide Plan, is the recognition and approval of affirmative action agreements between local governments and industry representatives as an acceptable alternative to the Department's requirement for developer submission of individual affirmative marketing plans with applications for mortgage insurance or assistance. In addition, HUD could arrange with local governments to meet with representatives of the industry to explain the principles of the Guide Plan and locally adopted plans, and to actively encourage the negotiation and execution of agreements such as those outlined in this Plan. HUD's active participation in the negotiation and agreement process would provide added impetus to the overall implementation program.

Further, HUD could insure that all sponsors of housing projects submitted to HUD for insurance or assistance have an opportunity to become familiar with the metropolitan-wide affirmative action program and the benefits of participating in this effort. In the case of sponsors who have not entered into an agreement with the affected local government, HUD could facilitate the coordination of their required affirmative marketing efforts by formally transmitting individually developed affirmative marketing plans to the appropriate local agency. As noted earlier, these plans are no longer required as exhibits in initial multi-family housing applications submitted to HUD, and thus will not be received by local jurisdictions under the formal A-95 Project Notification and Review System. However, HUD might establish a special procedure for submitting such plans to local jurisdictions subsequent to completion of the A-95 review process.

HUD could also assist in implementation by coordinating the approach being taken in the Washington Metropolitan Area to its work in other related fields. For example, under the procedures for implementation of the HUD/GSA Memorandum of Understanding, HUD is responsible for identifying the availability and accessibility of housing resources on a non-discriminatory basis for low and moderate income employees of new and relocating Federal facilities for which GSA is negotiating a site. In addition, should a site be chosen where HUD has determined that sufficient housing resources of this nature are not available on an equal opportunity basis, the Department can consult with various sectors of the community to assist in developing a program to address this problem. Among the approaches suggested is for HUD to "work with real estate boards and the real estate industry to develop areawide affirmative marketing plans or other affirmative means of furthering the goals of Title VIII."* Should such action be deemed necessary, HUD could recommend industry participation in locally adopted fair housing affirmative action plans and agreements, rather than the establishment of separate plans, and could expedite coordination with the affected local jurisdiction.

In endorsing actions to be taken by the industry, HUD should also examine its own internal processes to determine where additional work may be needed to further equal opportunity. For example, many of the activities undertaken by the Federal Housing Administration (FHA) in insuring loans are very similar to those utilized by the private industry in granting home mortgages. To insure that the procedures used in these processes are fair and equitable to all, HUD should encourage not only the private industry but also FHA to review existing underwriting forms and criteria, with a view toward standardizing these elements in both the private and public sectors.

HUD could also provide technical assistance to all participants in the affirmative action program, and assist in seeking funds from appropriate sources for the following activities:

- developing advertising materials for use in advertising campaigns promoting equal opportunity in housing and the merits of the Guide Plan;
- furnishing materials for use in fair housing training sessions;
- delineating affirmative employment policies and programs;

* Procedures for Implementation of Memorandum of Understanding Between HUD and GSA: A HUD Handbook, No. 8030.1, May, 1973, p. 15.

- establishing effective counseling and referral programs; and
- developing a metropolitan-wide housing information system.

Over the last few years, HUD has funded several programs which incorporate projects similar to those indicated above, as have private organizations such as the Ford Foundation. For example, HUD provided funds to the National Committee Against Discrimination in Housing (NCDH) for a demonstration program in the San Francisco Bay area which included the establishment of a centralized housing vacancy and referral service covering multifamily subsidized housing units throughout that metropolitan area. As noted earlier, the Council of Governments has already developed a computerized file similar to this, and could expand its coverage with additional funds. HUD has also provided funding to the City of San Leandro, California, to implement an affirmative marketing program parallel in many respects to that included in this Guide Plan. Therefore, increased financial support by HUD and other agencies and organizations of efforts such as those included in the Guide Fair Housing Affirmative Action Plan would not only contribute to achieving fair housing in the Washington Metropolitan Area, but would serve as a key link in a growing chain of nation-wide efforts.

Finally, HUD could play an important role in coordinating the affirmative action effort on a metropolitan-wide basis by working closely with local governments and representatives of the industry, as well as with COG to monitor achievement of the Guide Plan objectives. In order to accomplish the goals set out in this Plan, a strong intergovernmental approach is essential.

APPENDIX A

A-1 GUIDE FAIR HOUSING AFFIRMATIVE ACTION AGREEMENT
FOR USE BY PROFESSIONAL ASSOCIATIONS

A-2 GUIDE FAIR HOUSING AFFIRMATIVE ACTION AGREEMENT
FOR USE BY INDIVIDUAL FIRMS

APPENDIX A-1

METROPOLITAN WASHINGTON COUNCIL OF GOVERNMENTS
GUIDE FAIR HOUSING AFFIRMATIVE ACTION AGREEMENT
for use by Professional Industry Associations

THIS AGREEMENT, made and entered into this _____ day of _____, 19____, by and between _____ ("Local Government"), the U.S. Department of Housing and Urban Development and _____ ("Housing or Home Finance Industry Association," hereinafter referred to as the Association), signatory hereto,

WITNESSETH:

WHEREAS, it is the policy of the Local Government to insure equal opportunity for all persons to rent, purchase and obtain financing for adequate housing of their choice, regardless of race, color, religion, national origin, sex, marital status or age, including the number and presence of children; and

WHEREAS, the Local Government adopted a Fair Housing Affirmative Action Plan on the _____ of _____, 19____, to further promote the goals of equal housing opportunity through the joint efforts of the Government, individual firms and associations of the housing and home finance industry, the U.S. Department of Housing and Urban Development, hereinafter referred to as HUD, the Metropolitan Washington Council of Governments, hereinafter referred to as COG, and public and private interest groups; and

WHEREAS, the Local Government has determined that specific affirmative actions on the part of the housing and home finance industry are necessary to insure that all persons have an equal opportunity to obtain housing on a non-discriminatory basis; and

WHEREAS, the policies of the Association are in accordance with those of the Local Government regarding the need for additional action to insure equal housing opportunity;

NOW, THEREFORE, the parties hereto do agree as follows:

HOUSING AND HOME FINANCE INDUSTRY ASSOCIATION RESPONSIBILITIES

All activities and responsibilities included in this Part will be undertaken by the signatory Association.

Section I. Advertising Practices

The Association will develop a comprehensive advertising program to promote the principles and practices of equal housing opportunity throughout the metropolitan area, and will work to insure that its member firms are knowledgeable of and participate in the objectives of this effort. This advertising program will include the following elements:

- (1) In all major promotional advertising sponsored by the Association, the following majority and minority news media and media with a large minority audience will be utilized:

(To be completed by the Association)

- (2) The Association will initiate a public service advertising campaign including approximately _____ ads to be run on a _____ basis, to indicate its support for the principles of fair housing and publicize its own role in promoting equal housing opportunity.
- (3) A paid advertising campaign will be initiated by the Association as an alternative or supplement to the public service campaign to the extent that the public service campaign cannot be fully developed.
- (4) The Association will develop a series of _____ articles to be published in newspapers throughout the metropolitan area,

including information about the metropolitan-wide nature of the affirmative action effort and the locally adopted Plan, indicating the Association's intent to implement the various elements of the affirmative action program. All newspaper advertisements sponsored by the Association to promote the principles and goals of equal housing opportunity which include the use of human models will display these models in an integrated setting.

- (5) The Association will develop specific strategies to assist in better identifying available resources to all citizens of the metropolitan area, i.e., establish "Showcases of Homes" or mobile sales offices throughout the area, sponsor paid advertisements announcing the opening or continued availability of specific sale or rental housing units; and work with COG to develop a centralized file containing metropolitan-wide information on potential housing resources. (Not applicable to financial institutions.)
- (6) The Equal Housing Opportunity logo and slogan or Equal Lender logo and slogan, as appropriate, will be used in all printed advertisements sponsored by the Association and in the Association's monthly publications, and the Association will work to devise techniques to increase public awareness of the meaning of the logo. The spoken slogans or printed logos will be used in all industry-sponsored radio and television advertisements.
- (7) The Association will inform all member firms of their obligation to advertise in accordance with the Federal Advertising Guidelines for Fair Housing, and will encourage their members to use a logo proportionate in size to other writing on all signs announcing the proposed or continued availability of housing units.
- (8) The Association will insure that member firms are aware of the affirmative action program and their role in the program by publishing _____ special articles in its own publications over the next _____ and through the use of internal memos.
- (9) The Association will develop special contacts with community and citizen organizations, and

institute a series of _____ speaking engagements on a _____ basis to familiarize community members with the principles of the affirmative action effort and locally adopted Plan, and the Association's role in implementing the Plan.

Section 2. Employee Training Procedures

The Association will work with the appropriate local agency, COG and HUD to assist its members in developing effective techniques to inform employees of fair housing legislation and goals, and the rationale for affirmative action.

- (1) The Association will begin working with the above agencies in the development of a model fair housing training program for use in its members' firm.
- (2) The Association will immediately begin to provide member firms with fair housing training materials obtained from appropriate agencies, as well as assist its members in evaluating the effectiveness of materials and techniques currently in use.

Section 3. Employment Efforts

A special effort will be made by the Association to attract the membership of minority firms, and to assist member firms in seeking qualified and qualifiable job applicants from minority groups and other groups presently under-represented in the work force. This effort will include:

- (1) creation of fellowship or internship programs to aid in attracting and training minority personnel; and
- (2) development of a comprehensive listing of recruitment resources from which the Association's member firms can obtain the names of potential job applicants; or
- (3) establishment of a job bank and special referral services including listings of all positions available in member firms, and the names of appropriate personnel contacts.

Section 4. Financing/Home Purchase and Rental Procedures

The Association will provide guidance in standardizing the various procedures, criteria and forms utilized in the rental, financing and purchase of housing facilities, and promote the use of more uniform and equitable business practices throughout its member firms:

- (1) The Association will initiate an effort to designate and standardize those criteria which best measure an applicant's ability to afford housing, and will promulgate the use of standardized criteria by its member firms.
- (2) All business forms currently used by member firms in determining applicant eligibility will be examined to insure that the criteria used are directly related to an applicant's ability to pay for housing.
- (3) Model application forms will be developed by the Association to implement standardized eligibility criteria, and to provide a means of expediting the application process, e.g., the development of a "short" application form to assist in immediately notifying a potential apartment tenant of his or her eligibility.
- (4) The Association will encourage all member firms to develop each application to its fullest potential, including consideration of all pertinent information, and to provide equal advice and assistance to all applicants.

Section 5. Reporting Procedures

The Association will work with representatives of all appropriate local, State and Federal agencies to develop a comprehensive standardized recordkeeping and reporting system to include, at minimum, data on the race, sex and marital status of all applicants, and the approval or denial of all applications based upon the race, sex and marital status of all applicants.

Section 6. Designation of Responsibility for Implementation and Funding Authority

The Association will designate a high-ranking individual or committee to be responsible for implementation

of Sections 1-5 of this Agreement, and will authorize the expenditure of necessary monies to assist in paying for the expenses of implementation.

The person or persons in whom the above responsibility is vested will also monitor and evaluate the status of the program and provide progress reports to the local government, COG and HUD on a regular basis.

LOCAL GOVERNMENT RESPONSIBILITIES

The appropriate agency(ies) of the Local Government will provide advice and technical assistance to the Association in carrying out the responsibilities of this Agreement, including any assistance and cooperative effort available through COG, and will assist the Association in identifying and working with appropriate public and private interest groups.

HUD COORDINATION

The U.S. Department of Housing and Urban Development will assist in coordinating the actions of the Association, and will provide technical assistance and support in the implementation of this Agreement.

DURATION

This Agreement shall continue in force and effect subject to annual review by all parties and amendment if approved by all parties.

| | |
|------------------|----------|
| Local Government | By _____ |
| Association | By _____ |
| HUD | By _____ |

APPENDIX A-2

METROPOLITAN WASHINGTON COUNCIL OF GOVERNMENTS

GUIDE FAIR HOUSING AFFIRMATIVE ACTION AGREEMENT

for use by Individual Firms

THIS AGREEMENT, made and entered into this _____ day of _____, 19____, by and between _____ ("Local Government"), the U.S. Department of Housing and Urban Development and _____ ("Housing or Home Finance Industry Firm," hereinafter referred to as the Firm), signatory hereto,

WITNESSETH:

WHEREAS, it is the policy of the Local Government to insure equal opportunity for all persons to rent, purchase and obtain financing for adequate housing of their choice, regardless of race, color, religion, national origin, sex, marital status or age, including the number and presence of children; and

WHEREAS, the Local Government adopted a Fair Housing Affirmative Action Plan on the _____ day of _____, 19____, to further promote the goals of equal housing opportunity through the joint efforts of the Government, individual firms and associations of the housing and home finance industry, the U.S. Department of Housing and Urban Development, hereinafter referred to as HUD, the Metropolitan Washington Council of Governments, hereinafter referred to as COG, and public and private interest groups; and

WHEREAS, the Local Government has determined that specific affirmative actions on the part of the housing and home finance industry are necessary to insure that all persons have an equal opportunity to obtain housing on a non-discriminatory basis; and

WHEREAS, the policies of the Firm are in accordance with those of the Local Government regarding the need for additional action to insure equal housing opportunity;

NOW, THEREFORE, the parties hereto do agree as follows:

HOUSING AND HOME FINANCE INDUSTRY FIRM RESPONSIBILITIES

All activities and responsibilities included in this Part will be undertaken by the signatory Firm.

Section I. Advertising Practices

The individual firm will utilize the affirmative advertising practices outlined below in all daily business activities.

- (1) The following majority and minority news media and media with a large minority audience will be utilized in all advertising sponsored by the firm:

(To be completed by the Firm)

- (2) All advertising will be developed and published in accordance with the Federal Advertising Guidelines for Fair Housing.
- (3) The Firm will display the HUD fair housing poster or Equal Lender poster, as appropriate, and the Equal Employment Opportunity poster in all business offices, including rental, sales and lending offices, and in model homes.
- (4) The Equal Housing Opportunity or Equal Lender logo, as appropriate, will be used in all television advertisements, and the Equal Housing Opportunity or Equal Lender slogan, as appropriate, in all radio advertisements.
- (5) The Equal Housing Opportunity logo will be displayed proportionate in size to other writing on all signs indicating current or future availability of specific housing units.

- (6) In all advertisements which include human models, particularly brochures, the Firm will display these models in an integrated setting.
- (7) Advertisements and brochures will be mailed to both minority and majority group neighborhoods whenever a direct mailing advertising technique is utilized.

Section 2. Employee Training Procedures

To insure that its employees are familiar with all aspects of fair housing and affirmative action, the Firm will include a discussion of these subjects in all employee orientation sessions, as well as conduct a minimum of formal and informal fair housing discussions within the following time period: : These sessions will include the following elements at minimum:

- (1) an analysis and interpretation of Federal, State and local laws as they pertain to the Firm's operations;
- (2) use of methods to sensitize employees to the special needs of many of the households in the metropolitan area, e.g., minority applicants and female heads of households, and the best means of dealing with these needs in an affirmative manner;
- (3) a discussion of the need to avoid the use of procedures and practices which have been shown to have a discriminatory effect; and
- (4) a clear statement of the Firm's policies toward open housing and the affirmative action effort.

Section 3. Employment Efforts

The Firm will take immediate steps to integrate its work force to insure that the employees are representative of all segments of the population, and will coordinate its employment program with the efforts of its appropriate professional association.

- (1) All employee recruitment techniques will be examined to insure that they are directed toward all segments of the population.
- (2) Advertisements for job openings will be placed in both majority and minority media resources, will include the use of the Equal Employment Opportunity slogan, and will be designed to convey the concept of employment on an equal opportunity basis.
- (3) The Firm will utilize all listings of recruitment sources provided by its appropriate profession association.
- (4) The Firm will assist in developing an association-sponsored job bank by providing and updating employment information on a continuing basis.
- (5) Openings will be provided in the Firm for participants in association-sponsored fellowship or internship programs.

Section 4. Financing/Home Purchase and Rental Procedures

The Firm will work both individually and in concert with its appropriate professional association to standardize application forms and eligibility criteria, and to develop uniform business policies and procedures. In addition, the Firm will undertake the following:

- (1) A single unified list of available housing resources will be developed and utilized in response to all applicants' requests, and written procedures will be developed specifying the person(s) responsible for providing the list to applicants, as well as adding or removing individual units from the list.
- (2) All prospective mortgage applicants will be informed of all of the various forms of financing available. (Not applicable to apartment owners and managers or rental agents.)
- (3) The Firm will inform all potential clients of its application policies, and clearly point out all restrictions.

- (4) Uniform written procedures will be developed regarding the use of security deposits and imposition of special fees and will be provided to all potential applicants.

The following sections (5-14) do not apply to real estate brokers and salespersons, except where applicants are pre-screened for home loans.

- (5) All income will be counted by the Firm in the evaluation of each application, regardless of source, when it is documented that this income is regularly earned or received, including the entire income of a wife; income from other household members; child support; alimony; part-time income; over-time income; social security and private retirement benefits; Veteran's benefits; workman's compensation and disability benefits; and welfare payments.
- (6) The Firm will include current income, employment and past rental records in evaluating rental applicants, with the addition of credit records and references in home loan applicant evaluations.
- (7) Attitudes and practices with regard to birth control, or the intention of having or not having children, will not be requested or considered by the Firm in the evaluation of any application.
- (8) The Firm will not include marital status as a factor in application evaluation.
- (9) All credit evaluation procedures will be applied uniformly with emphasis placed upon the applicant's recent credit record.
- (10) The Firm will notify all applicants rejected on the basis of a credit report of the source of that report, and of their right to contact the appropriate credit bureau to review and obtain clarification of the contents of the report.
- (11) The Firm will evaluate each applicant's work record carefully in considering the criteria of job stability, to determine whether frequent job changes are due to poor work habits or to an attempt to obtain better employment.

- (12) The Firm will not consider an applicant's arrest record in evaluating his or her application.
- (13) An applicant's record of convictions will not provide a basis for automatic rejection of his or her application.
- (14) All applications will be processed as expeditiously as possible, and applicants will be notified of the time period within which approval or denial will be determined. If the Firm is unable to reach a decision on an application within that time period, the applicant will be notified of this fact, and of the current status of the application.

The following sections (15-20) apply only to lending institutions.

- (15) The Firm will establish an appeal mechanism to provide a 30-day period following the rejection of a home loan application within which an applicant may request reconsideration based upon the submission of adequate documentation.
- (16) All homes will be appraised for value in an equitable manner, regardless of the neighborhood in which the property is located, and the Firm will not participate in the practice of redlining, or refuse to give an appraisal or loan for properties located in designated neighborhoods.
- (17) The Firm will not utilize arbitrary and unequally applied home design or structural requirements in evaluating properties for home loans.
- (18) Procedures utilized to appeal an unsatisfactory appraisal will be explained and made available to each applicant.
- (19) The Firm will make every effort to insure that the pre-screening of all loan applicants referred to the Firm by developers and real estate brokers is conducted in an affirmative manner.

- (20) The Firm will request builders and developers to enter into an Agreement with the Local Government similar to this one, before the Firm enters into contractual arrangements to provide said builders and developers with mortgage commitments for use by individual purchasers in specified housing units.

The following sections (21-25) apply only to building owners and managers and rental agents.

- (21) The Firm will notify all applicants rejected for tenancy of the reasons for the rejection.
- (22) A waiting list will be established by the Firm, if such a list does not currently exist, and will be utilized for tenant selection as units become available.
- (23) Procedures will be developed in respect to the establishment and/or maintenance of the waiting list which will assure that each approved applicant is granted access to an available unit in the order of the date of acceptance.
- (24) If the Firm has an extensive waiting list for units under management, and has not solicited minority applicants, minority households will be given preference in obtaining rental units.
- (25) The Firm will review its policies regarding occupancy limits and revise these, if needed, to insure households with children an equal opportunity to obtain rental units.

Section 5. Reporting Procedures

The Firm will work with its appropriate professional associations to develop a comprehensive standardized record-keeping and reporting system to include, at minimum, data on the race, sex and marital status of all applicants, and the approval or denial of all applications based upon the race, sex and marital status of all applicants.

Section 6. Designation of Responsibility for Implementation and Funding Authority

The Firm will designate a high-ranking individual or committee to be responsible for implementation of Sections 1-5 of this Agreement, and will authorize the expenditure of necessary monies to assist in paying for the expenses of implementation.

The person or persons in whom the above responsibility is vested will also monitor and evaluate the status of the program and provide progress reports to the local government, COG and HUD on a regular basis.

LOCAL GOVERNMENT RESPONSIBILITIES

The appropriate agency(ies) of the Local Government will provide advice and technical assistance to the Firm in carrying out the responsibilities of this Agreement, including any assistance and cooperative effort available through COG, and will assist the Firm in identifying and working with appropriate public and private interest groups.

HUD COORDINATION

The U.S. Department of Housing and Urban Development will assist in coordinating the actions of the Firm, and will provide technical assistance and support in the implementation of this Agreement.

DURATION

This Agreement shall continue in force and effect subject to annual review by all parties and amendment if approved by all parties.

| | |
|------------------|----------|
| Local Government | By _____ |
| Firm | By _____ |
| HUD | By _____ |

APPENDIX B

FEDERAL, STATE AND LOCAL FAIR HOUSING LAWS
IN EFFECT IN THE
WASHINGTON METROPOLITAN AREA

APPENDIX B

FEDERAL, STATE AND LOCAL FAIR HOUSING LAWS
IN EFFECT IN THE
WASHINGTON METROPOLITAN AREA

FEDERAL LAWS

1866 Civil Rights Act, Rev. Stat. § 1978, 42 U.S.C.
§ 1982 (1970).

1968 Civil Rights Act, Title VIII, § 801, 82 Stat. 81
(1968), 42 U.S.C. § 3601 (1970).

STATE LAWS

State of Virginia Fair Housing Law

VA. CODE (1970 Replacement Vol., 1973 Supp.),
Title 36, ch. 5, §§ 87-96.

State of Maryland Human Relations Commission

MD. CODE ANN. (1972 Replacement Vol., 1973 Supp.)
art. 49B, §§ 1-30, as amended by ch. 296 and ch.
848, Session Laws of 1974.

LOCAL LAWS

DISTRICT OF COLUMBIA

District of Columbia, Human Rights Law

DISTRICT OF COLUMBIA, REGULATIONS, Title 34,
§§ 13.1 - 13.4 (1973).

MARYLAND SUBURBS

Montgomery County, Maryland, Discrimination in Housing

MONTGOMERY COUNTY, MD., CODE, art. III,
§§ 27-12 - 27-20 (1968), as amended June 19,
1972 and January 31, 1974.

Prince George's County, Maryland Human Relations
Commission

PRINCE GEORGE'S COUNTY, MD. CB-1-1972, May 2, 1972.

MARYLAND SUBURBS

City of Rockville, Maryland, Human Relations
Commission

CITY OF ROCKVILLE, MD., LAWS, ch. 13,
§§ 3.01 - 3.08 (1964).

City of Rockville, Maryland, Open Housing Ordinance

CITY OF ROCKVILLE, MD., LAWS, ch. 13,
§§ 4.01 - 4.10 (1967).

VIRGINIA SUBURBS

City of Alexandria, Virginia, Housing Availability
Code

CITY OF ALEXANDRIA, VA., CODE, ch. 17A,
§§ 17A-1 - 17A-17 (1967), as amended
February 27, 1973 and January 22, 1974.

Arlington County, Virginia, Fair Housing Ordinance

ARLINGTON COUNTY, VA., CODE, ch. 34, §§ 34.1 -
34.12 (1968), as amended July 8, 1972 and
April 20, 1974.

Fairfax County, Virginia, Housing Availability
Ordinance

FAIRFAX COUNTY, VA., CODE, ch. 15D, §§ 15D.1 -
15D.15 (1969), as amended June 19, 1972.

Falls Church, Virginia, Fair Housing Ordinance

CITY OF FALLS CHURCH, VA., ORDINANCE,
§§ 28.1 - 28.13 (1969), as amended
February 10, 1969, January 12, 1970 and
June 6, 1972.

Prince William County, Virginia, Human Relations
Commission

PRINCE WILLIAM COUNTY, VA., RESOLUTION NO.
73-35-42 (1973).

APPENDIX C

MINORITY MEDIA RESOURCES
IN THE WASHINGTON METROPOLITAN AREA

APPENDIX C

MINORITY MEDIA RESOURCES
IN THE WASHINGTON METROPOLITAN AREA*

| <u>NEWSPAPERS</u> | <u>PUBLICATION</u> | <u>CIRCULATION</u> |
|---------------------------------------------------------------------------------------------------------------------------------------|--------------------|--------------------|
| BLACK VOICE 7921 Piedmont Street Glenarden, Md. 773-2633 | Monthly | 25,000 |
| CAPITOL SPOTLIGHT 2001 Benning Road, N.E. Washington, D.C. 20002 399-2739 | Weekly | 22,500 |
| THE COLUMBIAN 1750 Columbia Road, N.W. Washington, D.C. 483-1200 | Bi-weekly | 10,000 |
| FOCAL MAJORITY National Organization of Women 1736 R Street, N.W. Washington, D.C. Violet Malinski, Editor 280-3443 | Monthly | 500 |
| THE HILLTOP Howard University 2400 Sixth Street, N.W. Washington, D.C. 20001 636-6100 | Weekly | 10,000 |
| INFORMACION** Spanish Speaking Community of Virginia 1430 North Uhle Street Arlington, Va. 22201 558-2128 | Monthly | 12,000 |

* This list is intended to serve as a guide to some of the media resources in the Washington Metropolitan Area which specifically direct all or a portion of their content to specific segments of the population.

** Normally does not accept advertisements, per se, but will list anything of specific interest to the Spanish speaking population, such as employment opportunities and special programs.

NEWSPAPERS

MUHAMMED SPEAKS
1515 4th Street, N.W.
Washington, D.C. 20001
667-0800

PUBLICATION

Weekly

CIRCULATION

34,000

NEW OBSERVER
811 Florida Ave., N.W.
Washington, D.C. 20001
232-3060

Weekly

30,000

OFF OUR BACKS
1724 20th Street, N.W.
Washington, D.C.
234-8072

Monthly

1,100*

WASHINGTON AFRO-AMERICAN
1800 11th St., N.W.
Washington, D.C. 20001
332-0080

Bi-weekly

20,000

WASHINGTON INFORMER
Suite 204
715 G Street, N.W.
Washington, D.C.
628-8338

Weekly

35,000

MAGAZINES

EBONY
1750 Pennsylvania Ave., N.W.
Washington, D.C. 20006
298-7836

PUBLICATION

Monthly

CIRCULATION

52,000*

JET
1750 Pennsylvania Ave., N.W.
Washington, D.C. 20006
298-7836

Weekly

33,000*

RADIO STATIONS

WFAN-FM, THE LATIN FORCE
5321 1st Place, N.E.
Washington, D.C.
882-0398

WOOK
5321 1st Place, N.E.
Washington, D.C. 20011
722-1000

* Metropolitan Washington circulation

RADIO STATIONS

WHUR-FM
2400 4th Street, N.W.
Washington, D.C.
265-9494

WUST
815 V Street, N.W.
Washington, D.C. 20011
462-0011

WOL
1680 Wisconsin Ave., N.W.
Washington, D.C. 20007
338-5600

TELEVISION COVERAGE

WMAL-TV
BLACK ON WHITE
DIARO*
3361 Connecticut Ave., N.W.
Washington, D.C. 20008
686-3000

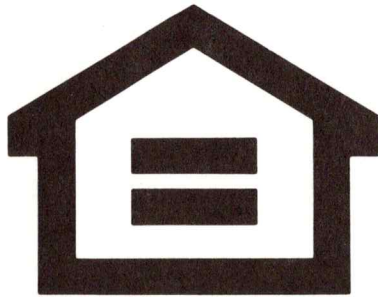
WTTG-TV
BLACK NEWS
5151 Wisconsin Ave., N.W.
Washington, D.C. 20016
244-5151

WTOP-TV
PRISMA*
4001 Brandywine Road, N.W.
Washington, D.C.
686-6000

* Special features presented once a month.

APPENDIX D

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT'S
ADVERTISING GUIDELINES FOR FAIR HOUSING



**EQUAL HOUSING
OPPORTUNITY**

Rules and Regulations

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Office of Assistant Secretary for Equal
Opportunity

[Docket No. R-72-108]

ADVERTISING GUIDELINES FOR FAIR HOUSING

Notice of Statement of Policy

In order to facilitate and promote compliance with the requirements of Title VIII of the Civil Rights Act of 1968, and particularly section 804(c) thereof (42 U.S.C. 3601, 3604(c)) regarding notices, statements or advertisements, the Department of Housing and Urban Development has prepared guidelines to indicate graphic and written references that are appropriate for the preparation, publication, and general use of advertising matter with respect to the sale or rental of a dwelling as defined by the Act.

Notice of a proposed statement of policy was published in the FEDERAL REGISTER on May 21, 1971 (36 F.R. 9266). Comments were received from 26 interested persons and organizations and consideration has been given to each comment.

Several comments observed that the proposed policy statement was at times unnecessarily limited to the field of newspaper advertising. In response to the comments, the policy statement has been revised in several places to clarify that the guidelines apply to advertisements in all media, including, e.g., television and radio, as well as to advertising agencies and other persons who use advertising.

Several organizations suggested additional catchwords connoting a discriminatory effect for inclusion in section A-3. That section has been expanded to include several additional terms which may have a discriminatory effect when used in a discriminatory context.

In response to other comments, section A-6 has been revised to clarify how directional references could be employed in a discriminatory context with an ethnically, as well as a racially, discriminatory effect. Also, section A-7 has been added relating specifically to designation of religious, ethnic or racial facilities to identify an area or neighborhood.

A number of comments indicated that human models or Equal Opportunity advertisements can and have been used selectively to promote the development of racially exclusive communities. A new section C-4 has been added in order to meet this specific problem. The previous human models section has been clarified by revision and reorganization in the new section C, in light of comments which indicated confusion or uncertainty surrounding the use of human models.

In response to publishers' comments, Table I has been simplified and references to minimum type sizes limited to a recommendation that the type should be bold display face and no smaller than eight points.

A number of organizations suggested the inclusion of a publisher's notice to appear with real estate advertising. A suggested notice has been included as Table III, in lieu of the provision in the proposed guidelines for direct notification to all firms or persons using the advertising services of a publisher. This provision was removed in light of objections that such notification would be unworkable or would impose great hardship since a large volume of real estate advertising is placed by a great number of persons on a nonrecurring basis.

Finally, a number of minor editorial or organizational changes have been made in order to clarify or simplify the advertising guidelines.

Several organizations suggested that the guidelines make specific reference to the roles of other enforcement agencies, including the Department of Justice and local agencies. These comments suggested that the guidelines specify that they do not alter or affect conciliation agreements or court orders obtained by these agencies, as well as by the Department. Such a disclaimer appears to be unnecessary, since there is nothing in the guidelines to indicate an intent to alter or affect agreements or orders obtained by the Department and other agencies.

This document is issued pursuant to section 7(d), Department of Housing and Urban Development Act, 42 U.S.C. 3535(d).

The statement of Policy reads as follows:

PUBLICATION GUIDELINES FOR COMPLIANCE WITH TITLE VIII OF THE CIVIL RIGHTS ACT OF 1968

POLICY STATEMENT

Section 804(c) of title VIII of the Civil Rights Act of 1968, 42 U.S.C. 3604(c), makes it unlawful to make, print, or publish, or cause to be made, printed, or published any notice, statement, or advertisement, with respect to the sale or rental of a dwelling (any building, structure, or portion thereof which is occupied as, or designed or intended for occupancy as, a residence by one or more families, and any vacant land which is offered for sale or lease for the construction or location thereof of any such building, structure, or portion thereof) that indicates any preference, limitation, or discrimination based on race, color, religion, or national origin, or an intention to make any such preference, limitation or discrimination.

These advertising guidelines are being issued for the purpose of assisting all advertising media, advertising agencies, and all other persons who use advertising to make, print, or publish or cause to be made, printed, or published any classified or display advertisement with respect to the sale or rental of a dwelling by the owner or his agent, in compliance with the requirements of title VIII.

Conformance with these guidelines will be considered in evaluating compliance with title VIII in connection with investigations by the Assistant Secretary of advertising practices and policies under the title.

A. The use of words, phrases, sentences and visual aids which have a discriminatory effect. The following words, phrases, symbols, and forms typify those most often used in residential real estate advertising to convey either overt or tacit discriminatory intent. Their use should therefore be avoided in order to eliminate their discriminatory effect. In considering a complaint under title VIII, the Assistant Secretary will normally consider the use of these and comparable words, phrases, symbols, and forms to indicate possible violation of the title and to establish a need for seeking resolution of the complaint, if it is apparent from the context of the usage that discrimination within the meaning of the Title is likely to result.

1. *Words descriptive of dwelling, landlord, and tenant.* White private home, Colored home, Jewish home.

2. *Words indicative of race, color, religion, or national origin.* Negro, Hispano, Mexican, Indian, Oriental, Black, White, WASP, Hebrew, Irish, Italian, European, etc.

3. *Catch words.* Restricted, ghetto, disadvantaged. Also words such as private, integrated, traditional, "board approval" or "membership approved" if used in a discriminatory context.

4. *Symbols or logotypes.* Symbols or logotypes which imply or suggest race, color, religion, or national origin.

5. *Colloquialisms.* Locally accepted words or phrases which imply or suggest race, color, religion, or national origin.

6. *Directions to the real estate for sale or rent (use of maps or written instructions).* References to real estate location made in terms of racially or ethnically significant landmarks such as an existing Black development (signal to Blacks) or an existing development known for its exclusion of minorities (signal to Whites). Specific directions given from a racially or ethnically significant area.

7. *Area (location) description.* Use of religious, ethnic, or racial facilities to describe an area, neighborhood, or location.

B. Selective use of advertising media or content with discriminatory effect. The selective use of advertising in various media and with respect to various housing developments or sites can lead to discriminatory results and may indicate a violation of title VIII.

1. *Selective geographic impact.* Such selective use may involve the strategic placement of billboards, brochure advertisements distributed within a limited geographic area by hand or in the mail, or advertising in particular geographic coverage editions of major metropolitan newspapers, or in local newspapers which are mainly advertising vehicles for reaching a particular segment of the community, or in displays or announcements only in selected sales offices.

2. *Selective use of equal opportunity slogan or logo.* Such selective use may involve using the equal opportunity slogan or logo in advertising reaching some geographic areas, but not others, or with respect to some properties but not others.

3. *Selective use of human models.* Such selective advertising may also involve the use of human models primarily in media that cater to one racial or ethnic segment of the population that is not balanced by a com-

plementary advertising campaign that is directed at other groups, or the use by a developer of racially mixed models to advertise one of the developments and not others.

C. Policy and practices guidelines. The following guidelines are offered as suggested methods of assuring equal opportunity in real estate advertising:

1. *Guidelines for use of logotype, statement, or slogan.* All advertising of residential real estate for sale or rent can contain an Equal Housing Opportunity logotype, statement or slogan as a means of educating the homeseking public that the property is available to all persons regardless of race, color, religion, or national origin. Table 1 (see appendix) indicates suggested sizes for the use of the logotype. In all space advertising which is less than 4 column inches of a page in size, the Equal Housing Opportunity slogan should be used. The advertisement may be grouped with other advertisements under a caption which states that the housing is available to all without regard to race, color, religion, or national origin. Alternatively, 3-5 percent of the advertisement copy may be devoted to a statement of the equal housing opportunity policy of the owner or agent. Table 2 (see appendix) contains copies of the suggested Equal Housing Opportunity logotype, statement and slogan.

2. *Guidelines for use of human models.* Human models in photographs, drawings, or other graphic techniques may be used to indicate racial inclusiveness. If models are used in display advertising campaigns, the models should be clearly definable as reasonably representing both majority and minority groups in the metropolitan area. Models, if used, should indicate to the general public that the housing is open to all without regard to race, color, religion, or national origin, and is not for the exclusive use of one such group.

3. *Guidelines for notification of Fair Housing Policy.* (a) *Employees.* All publishers of advertisement advertising agencies, and firms engaged in the sale or rental of real estate should provide a printed copy of their nondiscriminatory policy to each employee and officer.

(b) *Clients.* All publishers of advertisements and advertising agencies should post a copy of their nondiscrimination policy in a conspicuous place wherever persons come to place advertising and should have copies available for all firms and persons using their advertising services.

(c) *Publisher's notice.* All publishers are encouraged to publish at the beginning of the real estate advertising section a notice such as that appearing in Table 3 (see appendix).

Effective date. This statement of policy shall be effective May 1, 1972.

SAMUEL J. SIMMONS,
Assistant Secretary
for Equal Opportunity.

APPENDIX

The following three tables may serve as a guide for the use of the Equal Housing Opportunity logotype, statement, slogan, and publisher's notice for display advertising:

TABLE I

A simple formula can guide the real estate advertiser in using the Equal Housing Opportunity logotype, statement, or slogan. If other logotypes are used in the advertisement, then the Equal Housing Opportunity logotype should be of a size equal to the largest of the other logotypes; if no other logotypes are used, then the following guidelines can be used. In all instances, the type should be bold display face and no smaller than 8 points.

| <i>Approximate size of advertisement</i> | <i>Size of Logotype in inches</i> |
|------------------------------------------|-----------------------------------|
| 1/2 page or larger----- | 2 x 2. |
| 1/6 page up to 1/2 page----- | 1 x 1. |
| 4 column inches to 1/6 page----- | 1/2 x 1/2. |
| Less than 4 column inches----- | (1). |

¹ Do not use.

TABLE II.—ILLUSTRATIONS OF LOGOTYPE, STATEMENT, AND SLOGAN

Equal Housing Opportunity logotype.



Equal Housing Opportunity statement:

We are pledged to the letter and spirit of U.S. policy for the achievement of equal housing opportunity throughout the Nation. We encourage and support an affirmative advertising and marketing program in which there are no barriers to obtaining housing because of race, color, religion or national origin.

Equal Housing Opportunity slogan:

"Equal Housing Opportunity."

TABLE III.—ILLUSTRATION OF PUBLISHER'S NOTICE

Publisher's notice:

All real estate advertised in this newspaper is subject to the Federal Fair Housing Act of 1968 which makes it illegal to advertise "any preference, limitation, or discrimination based on race, color, religion, or national origin, or an intention to make any such preference, limitation, or discrimination."

This newspaper will not knowingly accept any advertising for real estate which is in violation of the law. Our readers are hereby informed that all dwellings advertised in this newspaper are available on an equal opportunity basis.

[FR Doc.72-4983 Filed 3-31-72;8:45 am]

Metropolitan Washington Council of Governments
1225 Connecticut Avenue, N.W.
Washington, D.C. 20036

Non Profit Org.
U.S. Postage
Paid
Washington, D.C.
Permit No. 42770