

# Greenhouse Ministries

## Affirmative Marketing Policy

### **PURPOSE**

In accordance with and in furtherance of Greenhouse Ministries' (GM) commitment to nondiscrimination and equal opportunity, GM has established procedures to affirmatively market and promote its programming. GM is also committed to the goals of increasing opportunities for persons with limited English proficiency, low-income individuals and underrepresented racial and ethnic groups. These goals will be achieved through the implementation of the Greenhouse Ministries Affirmative Marketing Policy.

### **POLICY ON NONDISCRIMINATION AND ACCESSIBILITY**

With respect to the treatment of all program participants, GM will not discriminate against any individual or family because of race, color, national origin, religion, sex or gender, disability, familial status or presence of children in a household, sexual orientation, gender identity, or marital status. Reasonable accommodations will be offered to all disabled persons who request accommodations due to disability at any time.

### **TRAINING**

GM provides all staff and volunteers with education on all relevant regulations, provisions and guidelines on nondiscrimination and accessibility. All staff and volunteers shall be required to follow the procedures and policies adopted by GM. On-site education programs shall include information on marketing, outreach, data collection, reporting, and record keeping. Staff members and volunteers shall annually receive instruction regarding these topics. GM shall certify annually that this training has taken place.

### **MARKETING AND OUTREACH**

In marketing its programming, GM shall include the use of newspapers of general circulation in its service area of Rutherford, Coffee and Wilson Counties. Affirmative marketing will commence at least 30 days prior to general marketing procedures. GM will continue outreach activities for as long as programs have available services or funding.

GM will place notices in newspapers, specialized publications, and newsletters to reach potential residents. Community media advertisement of the projects will be through the following local newspapers:

1. The Daily News Journal (<http://www.dnj.com/>)
2. Murfreesboro Post (<http://www.murfreesboropost.com/index.php>)

Special marketing outreach considerations will be given to the following underserved populations:

1. African-Americans
2. Hispanics
3. Persons with Disabilities

GM will contact local civic and community organizations representative of the ethnic and cultural diversity of the area in order to disseminate information about the program or development. Groups representing persons with disabilities and the elderly will also be contacted. Where necessary GM will publish its marketing materials in multiple languages to better reach individuals and families who may be limited in English proficiency.

To further inform individuals and families least likely to apply for its programs, GM will contact the following local organizations with program information:

Name of Organization	Population Served
	Persons with Disabilities
St. Clair Senior Center	Seniors
Journey Home Salvation Army	Homeless
Murfreesboro Housing Authority	Section 8 Households
Domestic Violence Shelter	Victims of Domestic Violence
Various places of worship and employment centers	All

Other community-based, nonprofit human service and housing agencies that maintain waiting lists or make referrals will be contacted.

Name of Organization	Address	Telephone

For housing programs, all advertising and written communications shall display the Equal Housing Opportunity logo or the phrase "Equal Housing Opportunity" and the accessibility logo when appropriate.

### **MINORITY BUSINESS ENTERPRISES AND WOMEN BUSINESS ENTERPRISES**

GM will take all necessary steps to ensure that minority firms, women-owned business enterprises, and labor surplus area firms are used whenever possible.

GM will take the following affirmative steps:

1. GM will place all qualified small and minority businesses and women-owned business enterprises on solicitation lists;
2. GM will assure that small and minority businesses, and women-owned business enterprises are solicited whenever they are potential sources;
3. GM will divide total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority business, and women-owned business enterprises;
4. GM will establish delivery schedules, where the requirement permits, which encourage participation by

- small and minority business, and women-owned business enterprises;
5. GM will use the services and assistance of the Small Business Administration, and the Minority Business Development Agency of the Department of Commerce; and
  6. GM will require the prime contractor, if subcontracts are to be let, to take the affirmative steps listed in this section.

## **RACE AND ETHNIC DATA COLLECTION AND REPORTING**

Any individuals or families who ask for services or assistance shall be asked to complete a report race and ethnic data.

Any individuals or families who are clients in the GM Housing Program will receive form HUD-27061-H "Race and Ethnic Data Reporting Form." GM will offer each household member the opportunity to complete the form. Parents or guardians can complete the form for children under the age of 18. Completed documents for the entire household shall be stapled together and placed in the household's file.

## **CONTACT INFORMATION**

**Rachel Young** serves as the GM Public Relations and Event Coordinator. **She** will keep the GM Board of Directors apprised of all affirmative marketing efforts through marketing reports. For non-housing clients, GM will report the number of individuals and families (by number of individuals in each household) who ask for services or assistance.

**Sam Gannon** serves as the GM Director of Program Development, which include the GM Housing Program. **He** will keep the GM Board of Directors apprised of all affirmative marketing efforts for the Housing Program through marketing reports. For housing clients, this report will include the number of housing program participants. For the GM rental, homeowner, and rehab/repair programs, the report will include the number of applicants, unit preference, number of actual occupants, ineligible applicants and cancellations.

## **COMPLIANCE ASSESSMENT**

GM will review the Affirmative Marketing Policy every five years and update as needed to ensure compliance. Advertising sources will be included in the review to determine if past sources should be changed or expanded.

GM will annually assess the success of affirmative marketing actions for each program. If the demographic data of the applicants and residents vary by 25% from the jurisdiction's population data, advertising efforts and outreach will be targeted to underrepresented groups in an attempt to balance the applicants and residents with the demographics of the jurisdiction.

## **RECORD KEEPING**

GM shall establish and maintain an Affirmative Marketing File to hold advertisements, flyers, and other public information documents to demonstrate that the appropriate logos and language have been used. Additionally, GM shall keep records describing actions taken of its activities in implementing the affirmative marketing plan, including other community outreach efforts and its annual analysis.

GM shall keep up-to-date records based on census data, housing applications, and surveys about community residents, housing applicants, residents in GM housing projects, and records about tenant selection or rejection.

GM shall provide monitors access to any pertinent books, documents, papers or other records of their properties, as necessary, for determining compliance with civil rights and nondiscrimination requirements.