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Question 2b – If a property is updating their AFHMP because of a change in ownership or if it is a new project, this question will not apply.

For properties submitting an updated AFHMP, this question needs to be more specific and provide more guidance on how properties should determine the effectiveness of their most recent AFHMP. How will properties know if their marketing efforts have reached groups least likely to apply?

Question 3a / 3b – Stating that properties cannot accept any applications until 60 days after their AFHMP is approved will be detrimental and create more vacancy loss for owners who wait extensive time periods for marketing plan approval. It currently can take over a year for plans to be reviewed and approved.

Question 3c – Many properties will not have a marketing budget. This question will create confusion and potential disapproval of plans, particularly if properties are expected to defend their limited or lack of budget.

If the owner intends to advertise in a newspaper or through other media, their budget could be listed there. Otherwise, this may not be an appropriate question to ask.

Question 4a – How does HUD/FHEO determine “significant under-representation”? Please quantify what the threshold for under-representation is or explicitly state it is the owner’s discretion to determine. Otherwise, HUD should not penalize or disapprove owners/agents for selecting “too many.”

Worksheet 4 - Finding two organizations to reach for each least likely to apply population will be difficult in small, rural communities and even in small cities. This will result in properties needing to find contacts outside of the HMA / EHMA (such as a state-wide organization that reaches the target population). If that is acceptable, the instructions should be amended. However, we strongly recommend only including one community contact per least likely to apply population, with the option for properties to include more if they so choose. We recommend not making it mandatory to include two due to the variation of town and city sizes and the variation of the presence of relevant organizations across the U.S. Marketing to an organization hundreds of miles away from the property is not the most effective or impactful way to attract potential applicants.

Question 7b: The instructions state, “Include a description of your engagement and collaboration with the primary outreach partner and attach any correspondence or formal agreement you develop with this entity,” but properties shouldn’t be asked to provide evidence of communications until they know the plan has been approved.

Question 11: How far back does HUD want owners/agents to include details about training – within the past year, two years, etc.?