



Section 504

(For Information Purposes ONLY)

Section 504 of the Rehabilitation Act of 1973, as amended, prohibits discrimination against persons with disabilities in the operation of programs receiving Federal financial assistance. It states, "No otherwise qualified individual with a disability in the United States... shall, solely by reason of her or his disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program, service or activity receiving Federal financial assistance or under any program or activity conducted by any Executive agency or by the United States Postal Service".

The U.S. Department of Housing and Urban Development (HUD) regulations, at **24 CFR Part 8**, sets a mandate for the DC Department of Housing and Community Development (DHCD) to monitor projects funded with federal funds for compliance with various federal regulations.

DHCD requires that the accessibility requirements of Section 504 be incorporated into the design and construction of all new construction and/or rehabilitation projects funded under the 2003 Notice of Funding Availability (NOFA) and Request for Proposals (RFPs). ***The Uniform Federal Accessibility Standards (UFAS) are the appropriate standards required under Section 504.***

NEW CONSTRUCTION (RESIDENTIAL)

DHCD requires ***all*** newly ***constructed*** developments (***built after July 1988***) to have a minimum of **5%** of the total dwelling units or at least one unit, whichever is greater, accessible for persons with mobility impairments. An **additional 2%** of the units must be accessible for persons who have hearing or vision impairments [24 CFR 8.22]. Accessible units to the maximum extent feasible must be distributed throughout the project. HUD may prescribe a higher percentage of units be accessible based upon the need for accessible units in the geographic area.

SUBSTANTIAL ALTERATIONS/ REHABILITATION (RESIDENTIAL)

Developments that undergo substantial alterations are required to have a minimum of 5% of the dwelling units wheelchair accessible. The definition of Substantial Alterations (or rehabilitation) covers properties with 15 or more units when the cost of the alteration is 75% or more of the replacement cost of the completed property [See 24 CFR 8.23(a)]. Replacement cost is the current cost of construction and equipment for a newly constructed housing facility of the size and type being altered. Construction and equipment costs do not include the (1) cost of land, (2) demolition, (3) site only improvements, (4) non-dwelling facilities, and (5) administrative costs for project development activities. NOTE: The requirements for New Construction apply if substantial alterations are undertaken.

Cont.: Definitions of Laws/504

OTHER ALTERATIONS/REHABILITATION/ MODIFICATIONS (RESIDENTIAL)

Section 504 requires that if a development (regardless of the number of units) is making modifications which go beyond normal maintenance, but which do not fall into the category of substantial alterations (either because of cost or the development has less than 15 units) then the requirements of 24 CFR 8.23(b) - Other Alterations apply. Under this section, alterations to dwelling units shall, to the maximum extent feasible, be made readily accessible to and usable by individuals with disabilities. ***Alterations are required to be accessible, to the maximum extent feasible, up until a point where at least 5% of the units in a project are accessible.*** If alterations to single elements or spaces of a dwelling unit, when considered together, amount to an alteration of a dwelling unit, the entire unit shall be made accessible. Alteration of an entire unit is considered to be when at least all of the following individual elements are replaced:

- -renovation of whole kitchens, or at least replacement of kitchen cabinets; and
- - renovation of the bathroom, if at least bathtub or shower is replaced or added, or a toilet and flooring is replaced; and
- - replacement of entrance door jambs.

When the entire unit is not being altered, 100% of the single elements being altered must be made accessible until 5% of the units in the development are accessible. However, HUD and DHCD strongly encourage a recipient to make 5% of the units in a development readily accessible to and usable by individuals with mobility impairments, since that will avoid the necessity of making every element altered accessible, which often may result in having partially accessible units which may be of little or no value for persons with mobility impairments. It is also more likely that the cost of making 5% of the units accessible up front will be less than making each and every element altered accessible. Alterations must meet the applicable sections of the UFAS which govern alterations.

TENANT REQUESTS FOR MODIFICATIONS

With tenant requested modifications, when an applicant or tenant requires an accessible feature to accommodate a disability, the owner must provide such feature ***at his/her own expense*** unless doing so would result in a fundamental alteration in programs and/or an undue financial or administrative burden imposed on the operation of the program or facility.

NON-HOUSING FACILITIES

All of Section 504's nondiscrimination, program accessibility, and reasonable accommodation requirements that apply to housing facilities also apply to the operation of non-housing facilities and programs. New non-housing facilities must be designed and constructed to be readily accessible to and usable by persons with disabilities.

NOTE: Each applicant must sign and submit with the application the "Section 504 Certification Form" indicating the agreement to comply with the regulations, to be subject to DHCD monitoring for compliance, and to accept any applicable penalties for noncompliance. After reviewing the information in this document please review the Section 504 attachment and fill out the Certification Form

Cont.: Definitions of Laws/504

REASONABLE ACCOMMODATIONS

To determine if a funding recipient needs to make the necessary accommodations to an individual with a disability, courts use what is referred to as the balancing test where the reasonable accommodation must be made unless doing so would impose an unreasonable administrative and financial burden on the operation of the program. However, even if the decision by the court is made where there is too much of a burden then the funding recipient would have to take other steps to guarantee that individuals with handicaps receive the benefits of their service.

The accommodations required may vary depending on what aid is requested by those with the handicap, requests that could lead to changes in a program could include:

- Housing accommodation request
- Course substitution
- Modification requests in other programs, including transportation services and medical programs

Types of disabilities may vary as well which can include:

- Hearing impairments
- Learning disabilities and attention deficit/hyperactivity disorder
- Mobility and manual impairments
- Psychological disabilities and substance abuse problems
- Visual impairments

The funding recipient also has to accommodate those who would need assistance animals such as:

- Guide dog, which are used by people with visual impairments
- Hearing dogs
- Signal dogs
- Seizure-response dogs
- Service dogs, which help people with physical disabilities with such tasks as opening doors and picking up dropped items

Fundamental alterations to the funding recipient's program are not required in order to accommodate the disabled but the recipient is required to modify the program for people with disabilities to have an equal opportunity to participate.

Section 504 requires program accessibility in existing facilities, as opposed to mandating that all buildings be accessible, which is required only for new or altered facilities. Alterations include:

- Redesigning equipment
- Reassigning classes or other services to accessible buildings
- Assigning aides to beneficiaries
- Delivering services at alternative accessible sites
- Providing auxiliary aides

All elements of a program or activity need not be accessible to meet Section 504's requirements and offer persons with disabilities opportunities for full participation.

Cont.: Definitions of Laws/504

GENERAL ARCHITECTURAL REQUIREMENTS:

The level accessibility of the program receiving federal funds for a facility differs under the type of work being done.

Non-housing facilities under new construction have to be designed with the intent of making them accessible to and usable by the handicap.

Non-housing facilities receiving alterations have to be made accessible to and usable by the disabled to the maximum extent feasible; however, recipients have a little room to maneuver for compliance depending on the financial and administrative burden imposed by making the facility accessible and usable to the maximum extent feasible. Yet the recipient(s) must come up with some means to make the project accessible.

Existing non-housing facilities -When the recipient receiving federal funds has an existing non-housing facilities they have to make sure that their program is readily accessible and usable by the handicap; but they do not have to make each of their non-housing facilities accessible and usable, where there is a concern for historic preservation the recipient is not required to make the facility accessible if it disrupts important historic features of the property, and recipients do not have to take any action that significantly change the program being undertaken or results in unnecessary financial and administrative burdens yet they must find other means to make their program accessible and usable by the handicap.

Housing facility-when a housing facility is undergoing new construction, new multi-family housing has to be made readily accessible and usable by the handicap. Either five percent (5%) or at least one (1) unit in the multifamily housing project whichever number is greater must be made handicap accessible. Additionally two (2%) percent or at least one (1) unit in the dwelling has to be accessible for people with vision or hearing impairments. HUD is authorized to increase the percentage under the request of an affected recipient or any state or local government agency after it is demonstrated that there is a need for an increased percentage of units that should be made accessible to the handicap based on census data, any other current data including a currently effective Housing Assistance Plan or Comprehensive Homeless Assistance Plan, or due to a need for evidence for a higher percentage or number from any other manner. In these types of instances HUD takes into account the needs of those with and without handicaps.

When dealing with alteration on existing housing there are two categories to consider:

1. Substantial alteration- where alterations occur on a project that has fifteen or more units and the cost of the alteration is 75 percent or more of the replacement cost of the completed facility then they must following the guidelines of construction as if it was a new housing facility and take the necessary measures to make it the facility handicap accessible.
2. Other alterations- where there is a multifamily dwelling (including public housing), it has to be made to the maximum extent feasible handicap accessible. If a single dwelling is altered the entire dwelling has to be made handicap accessible. When five percent of the dwellings in a multifamily project are made accessible and usable to the handicap then no more units have to be made, but areas that are of common use the facility have to be made usable and accessible by the handicapped as well. HUD has the same authority as it has with new construction to make changes in the percentage of the number of units that are to be made accessible and usable by the handicap.

Cont.: Definitions of Laws/504

Existing housing

Facilities that receive federal financial assistance has to be accessible and usable by the handicap but there are limitations. Those recipients do not have to make each of its existing facilities accessible and usable by the handicap. The recipient is also not required to make substantial alterations that would result in unnecessary administrative and financial burdens yet the recipient would still have to guarantee that handicap individuals are able to receive the benefits of the program or activity.

If there is other means to make a program accessible except through structural changes than the recipient must do so.

Barrier Removal

Recipients must remove architectural and communications barriers in existing facilities if possible. This includes communication barriers that are an integral part of the physical structure of a facility such as:

- Barriers posed by permanent signs or alarm systems
- The failure to provide adequate sound buffers
- The presence of physical objects that impede the passage of sound waves

To determine if the removal of the barriers is possible one must look at all the factors involved like:

- The nature and cost of the action needed; and the overall financial resources of the site(s) involved in the action,
- The number of persons employed at the site, the effect on expenses and resources, legitimate safety requirements necessary for safe operation, including crime prevention measures, or the impact of such action on the operation of the site
- If applicable, the geographic separateness and the administrative or fiscal relationship of the site(s) in question to any parent corporation or entity
- If applicable, the overall financial resources of any parent corporation or entity, the number of employees of the parent corporation or entity, and the number, type, and location of its facilities
- If applicable, the type of operation(s) of the parent corporation or entity, including the composition, structure and functions of the workforce of the parent corporation or entity.

Standards for barrier removal in existing facilities differ from those in new construction, given the cost of making facilities accessible to those with disabilities. Due to the cost of renovating existing facilities less accessibility is required; however, newly constructed or altered facilities have more stringent requirements because the accessibility that is federally necessary can be implemented during the design and construction stages of development which would not be as costly.

The primary issue with accessibility is physical access to facilities (e.g. getting through the door from public sidewalks). After physical accessibility is attained then people must be able to have access to where the goods and services are made available to the public. The third priority is to make the restrooms accessible. The final priority is to removal of any other barriers.

Cont.: Definitions of Laws/504

ALTERING EXISTING STRUCTURES (PRIMARY FUNCTION AREAS)

Section 504 requires an accessible path of travel to areas undergoing substantial alterations, which cost 50 percent or more of the building's value. An accessible entrance and restrooms also are required by Section 504 when there are alterations. This specifically pertains to the areas in the facility that are of common use such as telephones, restrooms, and drinking fountains.

HINTS ON TO ACHIEVING 504 COMPLIANCE (CONSTRUCTION)

- New facilities whether housing or non-housing have to be designed and constructed in order for them to be readily accessible to those with a handicap
- Alterations are different for housing and non-housing facilities. Alterations to housing with fifteen or more units and where the cost of alterations is 75 percent or more of the replacement cost than the compliance to 504 is to occur under the guise of it being new construction. Non-housing facilities with alterations have to be made readily accessible to the maximum extent feasible
- Existing facilities that are not being altered only have to meet the standards for programmatic accessibility
- Alteration to sites that are labeled historic must occur without disrupting the integrity of the site where the sentimental value is diminished; however, if this cannot occur then they must move the program to another site that is accessible

Ways to assist those with a handicap include removing communication and architectural barriers like the following:


- With those with mobility impairments: install ramps; make curb cuts in sidewalks and entrances; reposition shelves; rearrange table, chairs, vending machines, display racks, and other furniture; reposition telephones; widen doors; install offset hinges to widen doorways; eliminate a turnstile or provide an alternative accessible path; install grab bars in toilet seats; rearrange toilet partitions to increase maneuvering space; insulate lavatory pipes under sinks to prevent burns; install raised toilet seats; install a full-length bathroom mirror; reposition the paper towel dispenser; create designated accessible parking spaces; install a paper cup dispenser at a water fountain; remove high pile, low density carpeting; and install vehicle hand controls
- With those with visual impairments add raised marking on elevator control buttons
- With those with hearing impairments install flashing light alarms

EXHIBIT Z-3

AFFIRMATION FAIR HOUSING MARKETING PLAN

ATTACHMENTS

- ☐ Affirmative Fair Housing Marketing Plan (AFHMP)
- ☐ Instructions on Completing the AFHMP

Affirmative Fair Housing Marketing Plan District of Columbia				D.C. Department of Housing and Community Development Office of Program Monitoring - Fair Housing and Equal Opportunity	
1a. Applicant's Name, Address (including city, state & zip code) & phone number		1c. Project/Application Number		1d. Total Number of Units	
		1e. Price of Rental Range		1f. Number of Accessible Units	
		1g. Approximate Starting Dates (mm/dd/yy) of Advertising			
		Occupancy			
1b. Project's Name, Location (include ANC, EZ/EC, Hot Spot, PPA, or others special target designation associated with project location)		1h. Housing Market Area (Ward & Neighborhood)		1i. Census tract	
2. Type of Affirmative Marketing Plan (check all that apply) <input type="checkbox"/> Project Plan _____ New _____ Updated <input type="checkbox"/> Annual Plan _____ White (non-minority) Area _____ Minority Area _____ Mixed Area (with _____ % minority residents)		3. Direction of Marketing Activity (Indicate which group(s) in the housing market area (DC) are LEAST LIKELY TO APPLY for the housing because of its location and other factors without special outreach efforts) <div style="display: flex; flex-wrap: wrap;"> <div style="width: 33%;"><input type="checkbox"/> White</div> <div style="width: 33%;"><input type="checkbox"/> Families with Children</div> <div style="width: 33%;"><input type="checkbox"/> African - Ethiopian</div> <div style="width: 33%;"><input type="checkbox"/> Black or African American</div> <div style="width: 33%;"><input type="checkbox"/> Person with Disabilities</div> <div style="width: 33%;"><input type="checkbox"/> Native Hawaiian or Other Pacific Islander</div> <div style="width: 33%;"><input type="checkbox"/> Hispanic or Latino</div> <div style="width: 33%;"><input type="checkbox"/> Asian - Vietnamese / Chinese</div> <div style="width: 33%;"><input type="checkbox"/> American Indian or Alaskan Native</div> </div>			
		4a. Marketing Program: Commercial Media (Check the type of media to be used to advertise the availability of this housing) <input type="checkbox"/> Newspapers/Publications <input type="checkbox"/> Radio <input type="checkbox"/> TV Billboards <input type="checkbox"/> Other (specify)			
Name of Newspaper, Radio or TV Station		Group Identification of Readers/Audience		Size/Duration of Advertising	
4b. Marketing Program: Brochures, Signs, and HUD's Fair Housing Poster (1) Will brochures, letters, or handouts be used to advertise? <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes", attach a copy or submit when available. (2) For project site sign, indicate sign size _____ x _____; Logo type size _____ x _____. Attach a photograph of project sign or submit when available. (3) HUD's Fair Housing Poster must be conspicuously displayed wherever sales/rentals and showings take place. Fair Housing Posters will be displayed in the <input type="checkbox"/> Sales/Rental Office <input type="checkbox"/> Real Estate Office <input type="checkbox"/> Model Unit <input type="checkbox"/> Other (specify)					

4c. Community Contacts. To further inform the GROUP (S) LEAST LIKELY TO APPLY and to know about the availability of the housing, the applicant agrees to establish and maintain contacts with the groups/organizations listed below that are located in the housing market area. If more space is needed, attach an additional sheet. Notify DHCD Project/Program Manager and DHCD Fair Housing Director of any changes in this list. Attach a copy of correspondence to be mailed to these groups/organizations. (Provide all requested information.)			
Name of Organization	Group Identification Primary ethnic group(s) serviced	Approximate Date (mm/dd/yy)	Person Contacted or to be Contacted
Address & Phone Number	Method of Contact		Indicate the specific function the Group/Organization will undertake in implementing the marketing program
5. Future Marketing Activities (Rental Units Only) Mark the box(s) that best describe marketing activities to fill vacancies as they occur after the project has been initially occupied. <input type="checkbox"/> Newspapers/Publications <input type="checkbox"/> Radio <input type="checkbox"/> TV <input type="checkbox"/> Brochures/Leaflets/Handouts <input type="checkbox"/> Internet / fax blast (circle one) <input type="checkbox"/> Site Signs <input type="checkbox"/> Community Contacts <input type="checkbox"/> Other (Specify)		6. Experience and Staff Instructions (See instructions) 6a. On separate sheets, indicate staff experience in marketing to groups identified as least likely to apply for housing. 6b. On separate sheets, indicate previous training or training to be provided to staff on Federal, State and local fair housing laws and regulations, as well as this AFHM Plan. Attach a copy of the instructions to staff regarding fair housing.	
7. Additional Considerations Attach additional sheets as needed.			
8. Review and Update By signing this form, the applicant agrees to review their AFHM Plan on a three to five year basis and update as needed to ensure continued compliance with DHCD's Affirmative Fair Housing Marketing policies.			
Signature of person submitting this Plan & Date of Submission (mm/dd/yy)			
Name (type or print)			
Title & Name of Company			
For DHCD- Office of Program Monitoring/ Fair Housing Division Use Only			
Approval By		Disapproval By	
Signature & Date (mm/dd/yyyy)		Signature & Date (mm/dd/yyyy)	
Name (type or print)		Name (type or print)	
Title		Title	



D.C. DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT (DHCD)
OFFICE OF PROGRAM MONITORING – FAIR HOUSING DIVISION
AFFIRMATIVE FAIR HOUSING MARKETING PLAN (AFHMP)

(DO NOT SUBMIT BACK TO DHCD)

INSTRUCTIONS: Affirmative Fair Housing Marketing Plan (AFHMP-DC) - DHCD

Send completed form to: DHCD, 801 North Capitol Street, NE – Suite 200
Attention: (Your) Project Manager

Each applicant is required to carry out an *affirmative program to attract prospective buyers or tenants of all minority and non-minority groups* in the housing market area regardless of their race, color, national origin, disability, familial status, religion, or sex. These protected groups in the housing market area who may be subject to housing discrimination include: White, Black or African American, Hispanic or Latino, Asian (DC-Chinese and Vietnamese), persons with disabilities, families with children, or -- American Indian or Alaska Native, Native Hawaiian or Other Pacific Islander-- where applicable by census data. The applicant shall describe in the AFHM Plan the proposed activities to be carried out during advance marketing, where applicable, and the initial sales and rent-up period. The affirmative marketing program also should ensure that *any group(s) of persons ordinarily not likely to apply for this housing without special outreach (See Part 3), know about the housing, feel welcome to apply and have the opportunity to buy or rent*

Completion of this form, including collection of information is estimated to average three (3) hours;¹ including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information) The Affirmative Fair Housing Marketing (AFHM) Plan is needed to ensure that all of our funding subrecipients are taking the necessary steps to eliminate discriminatory practices. No application for any housing project under any of DHCD's housing programs can be funded without an approved AFHM Plan. The responses are required to obtain or retain a benefit under the Fair Housing Act, Section 808(e)(5) & (6) and 24 CFR Part 200, Subpart M. The form contains no questions of a confidential nature. The District of Columbia Department of Housing and Community Development follows the federal guidelines for affirmative marketing in ensuring non-discriminatory practices by its subrecipients in housing and non-housing projects regardless of funding source.

Part 1-Applicant and Project Identification.

Blocks 1a thru 1f-Self-Explanatory. Block 1g-the applicant should specify the approximate date for starting marketing activities to the groups targeted for special outreach and the anticipated date of initial occupancy (if unoccupied). Block 1h-the applicant should indicate the housing market area, in which the housing will be (is) located (by Ward and Neighborhood name). Block 1i – the applicant may obtain census tract location information from local planning agencies, public libraries and other sources of census data. Block 1j the applicant should complete only if a Managing/Sales Agent (the agent can not be the applicant) is implementing the AFHM Plan.

Part 2-Type of Affirmative Marketing Plan:

Applicants for multifamily housing projects should check both the Project Plan and indicate the status of the AFHM Plan, e.g. new or update. As appropriate, single-family homebuilders who submit an AFHM Plan, should check the Annual Plan box.

All Project and Annual Plans should indicate the racial composition of the housing market area in which the housing will be (is) located by checking one of the three choices. Single-family scattered site builder should submit an Annual Plan that reflects the racial composition of each the housing market area in which the housing will be (is) located. For example, if a builder plans to construct units in both minority and non-minority housing market areas, a separate AFHM Plan shall be submitted for each housing market area.

¹ According to HUD Form 9325 Affirmative Fair Housing Marketing Plan

Cont.: AFHMP Instructions

Part 3-Direction of Marketing Activity.

Indicate which group(s) the applicant believes are least likely to apply for this housing without special outreach. Consider factors such as price or rental of housing, sponsorship of housing, racial/ethnic characteristics of housing market area in which housing will be (s) located, disability or familial status of eligible population, public transportation routes, etc.

Applicability:

This form is to be completed by all DHCD funding subrecipients: (1) multifamily projects; and (2) single-family home-builders that can not meet at least one of the following requirements: (a) is a signatory in good standing to a Voluntary Affirmative Marketing Agreement (VAMA); (b) has a HUD approved AFHM Plan; (c) has contracted with someone to market their houses who has an AFHM Plan or is a signatory to a VAMA in the District of Columbia; or (d) can self certify compliance with HUD's AFHM Regulations, maintain records of their AFHM activities and make the records available to HUD upon request. Single-family homebuilders that can meet at least one of the above requirements can complete block 11 on form HUD-92541-Builder's Certification of Plans, Specifications, & Site instead of completing the AFHM Plan. [See HUD Mortgage Letters 1995-18 dated April 28, 1995 and 2001-09 dated April 2, 2001]

Part 4-Marketing Program.

The applicant shall describe the marketing program to be used to attract all segments of the eligible population, especially those groups designated in Part 3 of this AFHM Plan as least likely to apply. The applicant shall state: the type of media to be used, the names of newspaper/call letters of radio or TV stations; the identity of the circulation or audience of the media identified in the AFHM Plan (e.g., White, Black or African American, American Indian or Alaska Native, Asian, Native Hawaiian or Other Pacific Islander, Hispanic or Latino, persons with disabilities, and families with children) and the size or duration of newspaper advertising or length and frequency of broadcast advertising. Community contacts include individuals or organizations that are well known in the housing market area or the locality, that can influence persons within groups considered least likely to apply. Such contacts may include, but need not be limited to: neighborhood, minority and women's organizations, grass root faith-based or other community based organizations, labor unions, employers, public and private agencies, disability advocates, schools and individuals who are connected with these organizations and/or are well-known in the community. Applicants should notify their local HUD- Office of Housing of any changes to the list in Part 4c of this AFHM Plan.

Part 5-Future Marketing Activities. Self-Explanatory.

Part 6-Experience and Staff Instructions.

6a. The applicant should indicate whether staff assigned to this project/program has previous experience in marketing housing to group(s) identified as least likely to apply for the housing. 6b. Describe the instructions and training previously provided or to be provided to the sales/rental staff assigned to this project. This guidance to staff must include information regarding Federal, State and local fair housing laws and this AFHM Plan. Copies of any written materials should be submitted with the AFHM Plan, if such materials are available.

Part 7-Additional Considerations.

In this section describe other groups to which the housing may be marketed and efforts not previously mentioned which are planned to attract persons least likely to apply for the housing. Such efforts may include outreach activities to grass root faith-based or other community based organizations and other ethnic groups with limited English proficiency (LEP).

Part 8-Review and Update.

By signing, the applicant assumes full responsibility for the AFHM Plans implementation and required reviews and updates. HUD may monitor the implementation of this AFHM Plan at any time and request modification in its format or content, where deemed necessary.

Notice of Intent to Begin Marketing.

No later than 90 days prior to the initiation of sales or rental marketing activities, the applicant of an approved AFHM Plan shall submit notice of intent to begin marketing. The notification is required by the Affirmative Fair Housing Marketing Plan Compliance Regulations (24 CFR Part 108.15). It is submitted either orally or in writing to the Office of Housing in the appropriate HUD Office servicing the locality in which the proposed housing will be located. OMB approval of the Affirmative Fair Housing Plan includes approval of this notification procedure as part of the AFHM Plan. The burden hours for such notification are included in the total designated for this AFHM Plan form.