

**City of Sioux Falls
Community Development
Affordable Housing Division**

Policy: Annual Comprehensive Analysis of the Rates of Participation in Housing Activities and Public Service Programs

Date: January 3, 2013

The City of Sioux Falls has developed this written policy to assess how minority groups utilize and access housing activities and programs administered by the Community Development department's Affordable Housing Division. The Affordable Housing Division will develop and implement affirmative marketing and outreach strategies to target any under-represented groups identified through the annual analysis. Under-representation is defined as a participation rate in any funded activity by a particular minority group that is less than that minority's representation among the general population within the City. The Affordable Housing Division will evaluate rate of participation by minority racial and ethnic groups, persons with disabilities, and female-headed households. This evaluation will be completed by April 30 of each year for the most recently completed program year.

1. **Programs Covered** – Any program receiving funding through the City's Affordable Housing Division of Community Development will be analyzed. This will include programs receiving:
 - 1.1. Federal Community Development Block Grant (CDBG) program funds
 - 1.2. Federal Home Investment Partnerships (HOME) program funds
 - 1.3. City of Sioux Falls general funds
 - 1.4. Other grant funds
 - 1.5. Any other funds issued through the Affordable Housing Division

2. **Limitations** – The Affordable Housing Division will analyze all programs and all beneficiaries with the following exceptions:
 - 2.1. The Affordable Housing Division will only analyze programs to the extent that the funding source requires. If the funding source does not require information on race, ethnicity, disability status, and/or female-headed households, the City will not analyze that group's participation in that particular program.
 - 2.2. Some programs funded by City general fund dollars will not require information on race, ethnicity, disability status, and/or female-headed households. In order to achieve maximum participation in a program, it may be necessary to limit paperwork for potential beneficiaries. (The City encountered an example of this with a painting and exterior improvement program undertaken by Habitat for Humanity beginning in 2011. The City and Habitat for Humanity hoped to achieve a dramatic change by targeting specific neighborhoods where a complete block or blocks of homes would be painted. We discovered that participation would be greatly diminished if any paperwork were required by the beneficiary. The decision was made that in order to strive for maximum participation no paperwork would be required by the property owner.)

3. **Implementation** – Programs achieving under-representation by a particular group will undertake the steps outlined below in an attempt to alleviate the under-representation. Under-representation is defined as any group that is not represented within a whole percentage point of that group’s representation in the population as a whole. (For example, if a certain minority were 0.5 percent of the population, but 0.0 percent of Community Development’s program beneficiaries were of that group, they would not be considered under-represented.)
 - 3.1. If a racial minority group is under-represented, Community Development and/or the administering recipient will undertake the following outreach and affirmative marketing efforts.
 - 3.1.1. Program materials will be made available at the offices of advocacy groups working with that particular racial group, if any.
 - 3.1.2. Past clients of this racial group will be contacted and urged to refer friends and family in need for the programs and services offered by Community Development.
 - 3.1.3. We will attempt to identify local media outlets that serve that particular minority group. If such outlets are identified, we will advertise or try to generate a story on our programs.
 - 3.2. If the Hispanic minority group is under-represented, Community Development and/or the administering recipient will undertake the following outreach and affirmative marketing efforts.
 - 3.2.1. Program materials will be made available at the offices of advocacy groups working with the Hispanic population, if any.
 - 3.2.2. Past clients of Hispanic ethnicity will be contacted and urged to refer friends and family in need for the programs and services offered by Community Development.
 - 3.2.3. We will attempt to identify local media outlets that serve the Hispanic population. If such outlets are identified, we will advertise or try to generate a story on our programs.
 - 3.3. If persons with disabilities are under-represented, Community Development and/or the administering recipient will undertake the following outreach and affirmative marketing efforts.
 - 3.3.1. Program materials will be made available at the offices of advocacy groups working with persons with disabilities, if any.
 - 3.4. If female-headed households are under-represented, Community Development and/or the administering recipient will undertake the following outreach and affirmative marketing efforts.
 - 3.4.1. Program materials will be made available at the offices of advocacy groups working with female-headed households, if any.