



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
Office of Fair Housing and Equal Opportunity
Midwest Regional Office, Region V
Ralph H. Metcalfe Federal Building
77 West Jackson Boulevard – Room 2101
Chicago, Illinois 60604-3507

August 7, 2019

John McMahon
1600 Kansas Avenue
Lorain, OH 44052

SUBJECT: Affirmative Fair Housing Marketing Plan (AFHMP)
Project Name: Harr Plaza
Project Number: OH16-8023-024
Project Location: 15 Chestnut Street, Elyria, OH 44035

Dear Mr. McMahon:

We are pleased to advise you that the subject Affirmative Fair Housing Marketing Plan (AFHMP) is approved as of the date of this letter.

Keep in mind, the primary purpose of the AFHMP program is to promote a condition in which individuals of similar income levels in the same housing market area have available to them a like range of choices in housing, regardless of the individuals' race, color, sex, religion, disability, familial status, or national origin.

The activities undertaken to affirmatively market your project should be implemented in accordance with the approved Plan and the Department's regulations. Accordingly, you must assure that:

1. The approved AFHMP is available for public inspection in your office at all times;
2. The HUD Fair Housing Poster is prominently displayed and properly maintained in all offices in which rental activity takes place, from the start of construction and throughout the construction and rental periods;
3. The Department approved Equal Housing Opportunity logo, slogan or statement is included in any printed material used in connection with rental of the units;
4. When your wait list is reopened all advertising material related to this housing contains the Equal Housing Opportunity logo, slogan or statement, in conformance with the Fair Housing Advertising regulations (24 CFR Part 109);
5. When your wait list is reopened copies of all correspondence and materials sent to community contacts should be submitted to the Branch Chief of the Programs and Compliance Division of the Office of Fair Housing and Equal Opportunity (FHEO);
6. When your wait list reopens, A Notification of Intent to Begin Marketing is submitted to this office no later than ninety (90) days prior to engaging in marketing

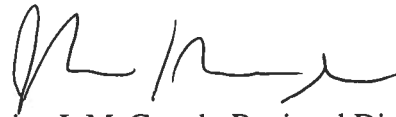
activities and that marketing activities commence ninety (90) days prior to the anticipated date of availability for occupancy of the first unit of the project; and,

7. Upon reopening your wait all marketing activities to persons designated “least likely to apply” are undertaken in advance of marketing to other prospective tenants for projects with non-elderly Section 8 units and persons identified as “expected to reside” in the community because of present or planned employment.

We encourage you to make every possible good faith effort to carry out the provisions and fulfill the objectives of your Affirmative Fair Housing Marketing Plan. In addition, you should maintain a file documenting your efforts, such as advertising, community contacts, etc., in carrying out the approved Plan.

Should you have any questions or need technical assistance, please contact Beranice Hartfield, Equal Opportunity Assistant, at (312) 913-8464 or David Long, Branch Chief, at (313) 234-7352.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. McGough', written in a cursive style.

Maurice J. McGough, Regional Director
Office of Fair Housing and Equal
Opportunity, Region V

Enclosure

Note to all applicants/respondents: This form was developed with Nuance, the official HUD software for the creation of HUD forms. HUD has made available instructions for downloading a free installation of a Nuance reader that allows the user to fill-in and save this form in Nuance. Please see <http://portal.hud.gov/hudportal/documents/huddoc?id=nuancereaderinstall.pdf> for the instructions. Using Nuance software is the only means of completing this form.

Affirmative Fair Housing Marketing Plan (AFHMP) - Multifamily Housing

U.S. Department of Housing and Urban Development
Office of Fair Housing and Equal Opportunity

OMB Approval No. 2529-0013
(exp.1/31/2021)

1a. Project Name & Address (including City, County, State & Zip Code) Harr Plaza 15 Chestnut Street Elyria, OH 44035	1b. Project Contract Number OH16-8023-024	1c. No. of Units 100
1d. Census Tract 708		
1e. Housing/Expanded Housing Market Area Housing Market Area: Lorain County Expanded Housing Market Area: Cleveland-Elyria Metropolitan Statistical Area		

1f. Managing Agent Name, Address (including City, County, State & Zip Code), Telephone Number & Email Address
 Lorain Metropolitan Housing Authority, 1600 Kansas Ave, Lorain, Lorain County, Ohio 44052 440.288.1600 lmha1600@lmha.org

1g. Application/Owner/Developer Name, Address (including City, County, State & Zip Code), Telephone Number & Email Address
 Owner: Lorain Metropolitan Housing Authority, 1600 Kansas Ave, Lorain, Lorain County, Ohio 44052 440.288.1600 lmha1600@lmha.org

1h. Entity Responsible for Marketing (check all that apply)
 Owner Agent Other (specify) _____
 Position, Name (if known), Address (including City, County, State & Zip Code), Telephone Number & Email Address
 Assistant Director, John McMahon; PH Operations Manager, Megan Newson; Placement Supervisor, Jennifer Zvosechz; Project Manager, Michael Volpe

1i. To whom should approval and other correspondence concerning this AFHMP be sent? Indicate Name, Address (including City, State & Zip Code), Telephone Number & E-Mail Address.
 John McMahon, Assistant Director 1600 Kansas Ave, Lorain, Lorain County, Ohio 44052 440.288.7422 jmcmaho@lmha.org

2a. Affirmative Fair Housing Marketing Plan
 Plan Type Date of the First Approved AFHMP:
 Reason(s) for current update:

2b. HUD-Approved Occupancy of the Project (check all that apply)
 Elderly Family Mixed (Elderly/Disabled) Disabled

2c. Date of Initial Occupancy

2d. Advertising Start Date
 Advertising must begin *at least* 90 days prior to initial or renewed occupancy for new construction and substantial rehabilitation projects.
 Date advertising began or will begin
For existing projects, select below the reason advertising will be used:

To fill existing unit vacancies	<input checked="" type="checkbox"/>
To place applicants on a waiting list	<input checked="" type="checkbox"/> (which currently has <input type="text" value="5"/> individuals)
To reopen a closed waiting list	<input type="checkbox"/> (which currently has <input type="text"/> individuals)

3a. Demographics of Project and Housing Market Area

Complete and submit Worksheet 1.

3b. Targeted Marketing Activity

Based on your completed Worksheet 1, indicate which demographic group(s) in the housing market area is/are *least* likely to apply for the housing without special outreach efforts. (check all that apply)

- White American Indian or Alaska Native Asian Black or African American
- Native Hawaiian or Other Pacific Islander Hispanic or Latino Persons with Disabilities
- Families with Children Other ethnic group, religion, etc. (specify)

4a. Residency Preference

Is the owner requesting a residency preference? If yes, complete questions 1 through 5. No
If no, proceed to Block 4b.

(1) Type Please Select Type

(2) Is the residency preference area:
The same as the AFHMP housing/expanded housing market area as identified in Block 1e? Please Select Yes or No

The same as the residency preference area of the local PHA in whose jurisdiction the project is located? Please Select Yes or No

(3) What is the geographic area for the residency preference?

(4) What is the reason for having a residency preference?

(5) How do you plan to periodically evaluate your residency preference to ensure that it is in accordance with the non-discrimination and equal opportunity requirements in 24 CFR 5.105(a)?

Complete and submit Worksheet 2 when requesting a residency preference (see also 24 CFR 5.655(c)(1)) for residency preference requirements. The requirements in 24 CFR 5.655(c)(1) will be used by HUD as guidelines for evaluating residency preferences consistent with the applicable HUD program requirements. See also HUD Occupancy Handbook (4350.3) Chapter 4, Section 4.6 for additional guidance on preferences.

4b. Proposed Marketing Activities: Community Contacts

Complete and submit Worksheet 3 to describe your use of community contacts to market the project to those least likely to apply.

4c. Proposed Marketing Activities: Methods of Advertising

Complete and submit Worksheet 4 to describe your proposed methods of advertising that will be used to market to those least likely to apply. Attach copies of advertisements, radio and television scripts, Internet advertisements, websites, and brochures, etc.

5a. Fair Housing Poster

The Fair Housing Poster must be prominently displayed in all offices in which sale or rental activity takes place (24 CFR 200.620(e)). Check below all locations where the Poster will be displayed.

Rental Office Real Estate Office Model Unit Other (specify)

5b. Affirmative Fair Housing Marketing Plan

The AFHMP must be available for public inspection at the sales or rental office (24 CFR 200.625). Check below all locations where the AFHMP will be made available.

Rental Office Real Estate Office Model Unit Other (specify)

5c. Project Site Sign

Project Site Signs, if any, must display in a conspicuous position the HUD approved Equal Housing Opportunity logo, slogan, or statement (24 CFR 200.620(f)). Check below all locations where the Project Site Sign will be displayed. Please submit photos of Project signs.

Rental Office Real Estate Office Model Unit Entrance to Project Other (specify)

The size of the Project Site Sign will be " x "

The Equal Housing Opportunity logo or slogan or statement will be " x "

6. Evaluation of Marketing Activities

Explain the evaluation process you will use to determine whether your marketing activities have been successful in attracting individuals least likely to apply, how often you will make this determination, and how you will make decisions about future marketing based on the evaluation process.

Application paperwork will ask "How did you hear about us?" We will track the responses and evaluate annually to determine if persons have learned about this housing option from our selected community contacts and marketing and also determine other possible community contacts to add.

We will evaluate the demographics of the property annually to determine if the number of persons in the targeted population categories have increased. If not sufficiently increased, we will continue marketing to those populations and research alternative community contacts.

7a. Marketing Staff

What staff positions are/will be responsible for affirmative marketing?

Assistant Director, PH Operations Manager, Placement Supervisor, Project Manager

7b. Staff Training and Assessment: AFHMP

- (1) Has staff been trained on the AFHMP?
- (2) Has staff been instructed in writing and orally on non-discrimination and fair housing policies as required by 24 CFR 200.620(c)?
- (3) If yes, who provides instruction on the AFHMP and Fair Housing Act, and how frequently?

LMHA holds Fair Housing training for all employees every February. It is conducted by experts in the field, such as the Fair Housing Center for Rights and Research in 2016, 2018, & 2019 and Don Eager & Associates in 2017.

- (4) Do you periodically assess staff skills on the use of the AFHMP and the application of the Fair Housing Act?
- (5) If yes, how and how often?

To assess staff skills agency wide, LMHA procures the services of the Fair Housing Center for Rights and Research to conduct paired testing annually throughout the agency over a period of 2-3 months.

7c. Tenant Selection Training/Staff

- (1) Has staff been trained on tenant selection in accordance with the project's occupancy policy, including any residency preferences?
- (2) What staff positions are/will be responsible for tenant selection?

Placement Supervisor, PH Operations Manager

7d. Staff Instruction/Training:

Describe AFHM/Fair Housing Act staff training, already provided or to be provided, to whom it was/will be provided, content of training, and the dates of past and anticipated training. Please include copies of any AFHM/Fair Housing staff training materials.

Annually, the AFHMP is reviewed by the Project Manager, Placement Supervisor, Operations Manager, and Assistant Director. These are the leaders of the key departments responsible for marketing, leasing up, and managing the property. As a result of these reviews and during meetings/trainings, staff are instructed on FH policies and the AFHMP.

To assess staff skills agency wide, LMHA procures the services of the Fair Housing Center for Rights and Research to conduct paired testing throughout the agency over a period of 2-3 months. The results of these tests are discussed with the LMHA Administration and incorporated into the annual FH training.

LMHA holds Fair Housing training for all employees every February. It is conducted by experts in the field, such as the Fair Housing Center for Rights and Research in 2016, 2018, & 2019 and Don Eager & Associates in 2017. Agendas and sign-in sheets are attached. (Employees listed as LCEHC are those who serve the Harr Plaza property.)

Certificates of completion of the Nan McKay Fair Housing and Reasonable Accommodation training are included for Megan Newson, Operations Manager (2/12/16); Michael Volpe, LCEHC Harr Project Manager (10/20/17); Jennifer Zvosechz, Placement Supervisor (9/22/16)

Fair Housing for Maintenance was completed by Dennis Cruz, Maintenance Technician, in December 2018.

The next all-employee training is scheduled for February 12, 2020.

8. Additional Considerations Is there anything else you would like to tell us about your AFHMP to help ensure that your program is marketed to those least likely to apply for housing in your project? Please attach additional sheets, as needed.

Print advertising is run in Town Money Saver, Senior Years newsletter, and La Prensa (local Spanish paper) as needed. Property marketing utilizing our Facebook page, website (lmha.org), and OhioHousingLocator.org. Staff markets housing programs by attending local events which have included El Centro block party, Lorain International Festival, Oberlin Family Fun Fair, Elyria Apple Festival, Lorain Community Senior Center Senior Expo, many of which reach a variety of demographics, including families with children and persons of Asian descent. The percentage of American Indian/Alaskan Native families in the marketing area (Lorain County) are less than 1%. With such a low percentage, this population requires no special marketing. LMHA periodically sends email blasts, postcards, and outreach letters to several social service agencies such as Office on Aging, Jobs and Family Services, homeless shelters, Board of Mental Health, senior centers, Salvation Army, veterans centers, Catholic Charities, etc.

9. Review and Update

By signing this form, the applicant/respondent agrees to implement its AFHMP, and to review and update its AFHMP in accordance with the instructions to item 9 of this form in order to ensure continued compliance with HUD's Affirmative Fair Housing Marketing Regulations (see 24 CFR Part 200, Subpart M). I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (See 18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Signature of person submitting this Plan & Date of Submission (mm/dd/yyyy)

John P. McMahon

Digitally signed by John P. McMahon
DN: cn=John P. McMahon, o=Lorain Metropolitan Housing Authority, ou, email=jcmcmaho@lmha.org, c=US
Date: 2019.08.06 09:47:41 -04'00'

Name (type or print)

John P. McMahon

Title & Name of Company

Assistant Director, Lorain Metropolitan Housing Authority

For HUD-Office of Housing Use Only

Reviewing Official:

For HUD-Office of Fair Housing and Equal Opportunity Use Only

Approval

Disapproval

Signature & Date (mm/dd/yyyy)

Signature & Date (mm/dd/yyyy)

[Handwritten Signature] 8/7/19

Name (type or print)

Title

Name (type or print)

John Meade

Title

Enforcement Branch Chief