



**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: International Plaza**  
**Project Number: OH16-8023-023**  
**Project Location: 1825 Homewood Drive, Lorain, OH 44055**

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,



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)

<b>1a. Project Name &amp; Address (including City, County, State &amp; Zip Code)</b>	<b>1b. Project Contract Number</b>	<b>1c. No. of Units</b>
International Plaza 1825 Homewood Drive Lorain, OH 44055	OH16-8023-023	100
	<b>1d. Census Tract</b> 237	
	<b>1e. Housing/Expanded Housing Market Area</b> 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

To place applicants on a waiting list  (which currently has  individuals)

To reopen a closed waiting list  (which currently has  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.   
If no, proceed to Block 4b.

(1) Type

(2) Is the residency preference area:  
The same as the AFHMP housing/expanded housing market area as identified in Block 1e?

The same as the residency preference area of the local PHA in whose jurisdiction the project is located?

(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 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?  Yes
- (2) Has staff been instructed in writing and orally on non-discrimination and fair housing policies as required by 24 CFR 200.620(c)?  Yes
- (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?  Yes
- (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?  Yes
- (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 International 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 International 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. 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=jcmahon@lmha.org, c=US  
 Date: 2019.08.06 09:48:11 -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)

[Empty box for Name]

Name (type or print)

John Meade

Title

[Empty box for Title]

Title

Enforcement Branch Chief