

January 15, 2019

Lorain Metropolitan Housing Authority
1600 Kansas Avenue
Lorain, OH 44052

RE: Affirmative Fair Housing Marketing Plan
Project Name: LMHA Oberlin Homes
Project Number: 110054

Dear Owner/Management,

The Ohio Housing Finance Agency (OHFA) reviewed the Affirmative Fair Housing Marketing (AFHM) Plan submitted for the above referenced project. The plan is approved as submitted.

The primary purpose of the affirmative fair housing marketing plan is to promote a condition in which households of similar income levels in the same housing market area have available to them a like range of choices in housing, regardless of the household's race, color, religion, sex, handicap, familial status, or national origin. Accordingly, OHFA has identified procedures you are required to follow pursuant to the goals of the program, federal regulations and your Plan. These procedures include the following:

- 1. The AFHM Plan must be available for public inspection.*
- 2. The HUD Fair Housing Poster/local Fair Housing Poster is required to be prominently displayed in all offices in which sales or rental activity takes place; displayed from the start of construction; and properly maintained throughout the construction and sales/rental period.*
- 3. All advertising material related to this housing must contain the Equal Housing Opportunity logo, slogan, or statement, in conformance with the HUD Fair Housing Advertising Regulation (24CFR Part 109).*
- 4. Marketing activities should begin no later than 90 days prior to the anticipated date of the availability for occupancy of the first unit of the project.*
- 5. Information on the race, sex of the head of household, disability, familial status, and ethnicity of applicants and tenants must be maintained to demonstrate the results of the owner's affirmative marketing efforts.*
- 6. A policy for referrals of housing questions to a fair housing provider must be developed and maintained.*
- 7. Special outreach to those least likely to apply for the housing must be provided annually.*
- 8. Property management sales/rental staff must receive fair housing training, and strongly recommends that staff attend trainings provided by either your local Fair Housing Agency or the Ohio Housing Finance Agency. Training must include information regarding Federal, State and local fair housing laws in relation to the provision of housing, as well as how your AFHM Plan is in compliance with Fair Housing Laws.*

9. *Annual evaluation of the AFHM efforts must be conducted to measure the effectiveness of the marketing program and adjustments made to your plan if necessary.*
10. *Evidence of all affirmative marketing actions and copies of materials sent to community contacts must be maintained in an AFHM program file for the period of affordability.*
11. *Additional requirements may apply to your Affirmative Marketing Strategy if the project received HOME funds or other federal financial assistance.*

OHFA strongly encourages you to carry out the provisions and fulfill the objectives of your AFHM Plan. Guidance on compliance procedures is available by contacting Pam Zinn by email, pzinn@ohiohome.org or by telephone, 614-466-3943.

Sincerely,



Pam Zinn
Compliance Review Coordinator

Affirmative Fair Housing Marketing Plan (AFHMP)



Project Name: LMHA Oberlin Homes

OHFA Project Number: 11-0054

<p>Address: 1600 Kansas Avenue Lorain, OH 44052</p>	<p>Number of Units: 51</p>	<p>Number of Buildings: 41</p>
<p>Plan Type: <input type="checkbox"/> Initial Plan <input checked="" type="checkbox"/> Updated Plan Previous Plan Effective Date: <u>9/16/2011</u> Reason(s) for update: _____</p>		
<p>Owner Name & Address: LMHA Oberlin Homes LLC 1600 Kansas Avenue Lorain, OH 44052 Phone: 440.288.1600 Email: lmha1600@lmha.org</p>	<p>Entity Responsible for Marketing (check all that apply) <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Other (specify) _____ Contact information for this AFHMP? Include Name and Address Lorain Metropolitan Housing Authority John McMahon, Assistant Director 1600 Kansas Avenue Lorain, OH 44052 Phone: 440.288.7422 Email: jmcmaho@lmha.org</p>	
<p>Management Company Name & Address: Lorain Metropolitan Housing Authority 1600 Kansas Avenue Lorain, OH 44052 Phone: 440.288.1600 Email: lmha1600@lmha.org</p>	<p>Approved Occupancy of the Project (check all that apply) <input checked="" type="checkbox"/> Elderly <input checked="" type="checkbox"/> Family <input checked="" type="checkbox"/> Disabled <input type="checkbox"/> PSH</p>	

1a. Demographic Groups Least Likely to Apply

1b. Housing Marketing Area: Lorain County

Is Housing Marketing Area selection based on? Population/Density Multiple Sites/Census Tracts Other Entire County

List the percentage of each demographic group for the project (if occupied), waiting list (if applicable), and housing market area (e.g. census tract, city, county). Can be obtained from a local planning office, or other official source like the U.S. Census Bureau <http://factfinder2.census.gov/main.htm>

Map showing the Housing Market Area and the housing marketing area demographic source should also be attached.

Demographic Characteristics	White	American Indian or Alaskan Native	Native Hawaiian or Pacific Islander	Asian	Black or African American	Hispanic or Latino	Persons with Disabilities	Families with Children	Other (specify) Elderly
%Project	64	0	2	0	34	20	38	84	4
% Waiting List	45.3	0.32	0.95	0	44	28.8	22.5	73.4	9.8
% Housing Market Area	85.2	0.31	0.04	1.0	8.4	9.5	15.3	32.8	27.4

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/ Alaska Native Native Hawaiian/ Other Pacific Islander
 Asian Black or African American Hispanic/ Latino Persons with Disabilities Families with Children
 Other underserved group, religion etc. (specify) Elderly

State Protected Classes: Ancestry Military Status Local Protected Classes/Underserved: _____

2a. Brochures, Signs and HUD's Fair Housing Poster

The Fair Housing Poster must be prominently displayed in all offices in which sale or rental activity takes place.

Location(s): 1600 Kansas Ave, Lorain; Mgmt Office 138 S Main St, Oberlin



Affirmative Fair Housing Marketing Plan (AFHMP)



AFHMP is available for public inspection at the sales or rental office. Location(s): 1600 Kansas Ave, Lorain; Mgmt Office 138 S Main St, Oberlin

Project Site Signs, if any, must display the HUD approved Equal Housing Opportunity (EHO) logo, slogan, or statement (24 CFR 200.620(f)). **Submit photo of project signs.** Location(s): No project signs (scattered sites)

Will printed materials and advertising include: Equal Housing Opportunity logo or slogan? Yes No
 Use of alternative format (e.g. Braille, large print, etc.)? Yes No *If yes, list in 2c.*
 Use of multiple languages? Yes No *If yes, list in 2 b or c as applicable.*

2b. Community Contacts for Marketing and Outreach

For each targeted population least likely to apply, identify at least one community contact organization you will use to facilitate outreach to the particular group. **In addition to the organization name, state the names of contact persons, their addresses, their telephone numbers, and title of the contact person.** May include a social service agency, religious body, advocacy group, community center, etc. **Attach correspondences to organizations.**

Target Population(s)	Community Contact(s) Information: <i>May be applicable to multiple populations</i>		Explanation on why/how organization works with population(s) identified
Disabled All races/ethnicities	LEAP/CIL 2100 N Ridge Rd, Elyria, OH 44035 440.324.3444		Works with disabled for housing conducive to an individual's abilities
Elderly All races/ethnicities Disabled	Lorain County Office on Aging 440.326.4800	Adult Protective Service 42485 North Ridge Rd Elyria, Ohio 44035 440.323.5726	serve vulnerable aging individuals and other adults with special needs, connect them to resources

2c. Methods of Advertising

For each targeted population, include the Name of Media Organization, Size & Duration of Advertising, and the Type of Media. Examples of media: newspaper, radio, billboards, website, etc. If pertinent include any language(s) in which the material will be provided or identify any alternative format(s) to be used (e.g. Braille, large print, etc.). **Attach copies of the advertising or marketing materials.**

Target Population(s)	Name of Media Organization	Size/Duration	Type of Media
All demographic groups	www.lmha.org; www.housinglocator.org	full web page/ongoing	websites
Elderly/disabled	Senior Years	1/8 page/as needed	Newspaper
All Demographic groups County Wide	Town Money Saver	full page/as needed	Glossy color 6 page advertising mailed to public
Brochures	LMHA distributes at marketing events	1 page/ongoing	1 page/doublesided/tri-fold
Spanish Speaking	La Prensa/North Coast Latino	1/8-1/4 page/as needed	Newspaper

2d. Evaluation of Marketing Activities

Explain the evaluation process used to determine whether your marketing activities have been successful in attracting individuals least likely to apply, how frequent is evaluation, and how you will make decisions about future marketing.

Since placed in service in December 2013, LMHA Oberlin Homes averages 8 vacancies per year. Most families moving into the property since then (and going forward) are existing families transferring from other LMHA public housing properties, typically to fulfill reasonable accommodations for one-floor plan or accessible units. As of 1/1/2019, 13 families are on the transfer list, and 5 families on the PH waiting list who are pre-qualified for LIHTC, which will take more than 2 years to exhaust. Hence, it has not been necessary to advertise for external applicants. Since there is minimal marketing required, the evaluation process is passive, meaning we need only review the overall demographics annually.



Affirmative Fair Housing Marketing Plan (AFHMP)



3a. Marketing Staff

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

Assistant Director/Operations Manager/Project Manager/Placement Supervisor

3b. Staff Training and Assessment: AFHMP

- (1) Has staff been trained on the AFHMP? Yes No *If yes, list in 5d.*
- (2) Has staff been instructed on fair housing policies as required by 24 CFR 200.620(c)? Yes No *If yes, list in 3d.*
- (3) Are staff's skills assessed on the use of the AFHMP and the Fair Housing Act? Yes No *If yes, list in 3d.*

3c. Tenant Selection Training/Staff

- (1) What staff positions are/will be responsible for tenant selection? Operations Manager/Placement Supervisor
- (2) Has staff been trained on tenant selection in accordance with the project's occupancy policy? Yes No

3d. Staff Instruction/Training: Samples and Dates

Please provide documentation of fair housing training and list below the names of attendees and dates of trainings.

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 Housing Research and Advocacy Center to conduct paired testing throughout the agency over a period of 2-3 months. The

4. 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.

Since very few families come from the waiting list, the families who reside in the 51 LMHA Oberlin Homes units had not been "targeted" for marketing. They are transferred based upon need, whether for reasonable accommodations, proximity to employment or medical service providers, or due to VAWA. The property has consistently served a wide demographic.

5. Signature and Acknowledgement

By signing this form, the agent/owner agrees to review its AFHM Plan at least once every 5 years throughout the life of the OHFA compliance period and to update it as needed in order to ensure continued compliance with HUD's Affirmative Fair Housing Marketing Regulations (see 24 CFR Part 200, Subpart M) and OHFA's policies. I hereby certify that all the information stated herein, as well as any information provided in the attached, is true and accurate.

John P. McMahon
Digitally signed by John P. McMahon
 DN: cn=John P. McMahon, o=Lorain Metropolitan Housing
 Authority, ou, email=jmcmaho@lmha.org, c=US
 Date: 2019.01.05 14:59:14 -05'00'

January 5, 2019

Owner Signature

Date of Submission

John P. McMahon

Assistant Director

LMHA

Name (type or print)

Title

Name of Company

For OHFA Use Only

[Signature]
 Signature & Date (mm/dd/yyyy)

1-15-19

Pamela Zinn

Compliance Review Coordinator

Name (type or print)

Title

For OHFA Use Only

Approval

Disapproval

