CITY OF LORAIN, OH
AFFIRMATIVE MARKETING PLAN

Adopted: July 14, 2021

AFFIRMATIVE MARKETING PLAN

To further the commitment to nondiscrimination and equal opportunity in housing, and in accordance with the regulations of the HOME Investment Partnerships Program (HOME), the City of Lorain has established the following policies and procedures to affirmatively market HOME-assisted housing programs and housing units.

The City of Lorain is committed to meeting the goals of affirmative marketing in furtherance of our fair housing objectives. As part of this commitment, the City requires HOME subrecipients, including Contract Administrators, Community Housing Development Organizations (CHDOs), Developers, and other recipients of HOME Program funds to comply with the affirmative marketing requirements.

As part of efforts to ensure that available housing and housing programs are marketed to persons not likely to apply for such housing, the city and all subrecipients shall make HOME information available in Spanish. While, the city is developing the HOME documents in Spanish, the city will work with El Centro to provide a translator for residents needing the assistance. All program materials will have a statement in Spanish that refers applicants to El Centro for assistance. Any Spanish speaking applicants who contact the office via of phone will be provided to someone in the office who is able to speak Spanish to inform them that El Centro will be able to provide assistance. Furthermore, the city and all subrecipients shall distribute relevant marketing materials to area social service agencies that work with minorities and disabled individuals.

Overview of Affirmative Marketing

An Affirmative Marketing Plan (Plan) and affirmative marketing procedures are required for all jurisdictions and subrecipients receiving HOME funds. Affirmative marketing procedures must continue throughout the length of the program, including the period of affordability. For homebuyer assistance and homeowner rehabilitation, the plan remains in effect until all HOME-funded activities are completed. For single-family homeownership dwellings, the plan remains in effect until all the dwelling units are sold.

Affirmative marketing should be an integral part of any project's overall marketing effort. Affirmative marketing typically consists of efforts to inform persons that are "least likely to apply" or under-represented in a neighborhood or community about opportunities for housing under the HOME program. Affirmative marketing ensures housing choices and opportunities are expanded to include those that might not otherwise be considered because of past discrimination.

An effective Affirmative Marketing Plan will attract prospective applicants of all minority and non-minority groups regardless of their race, color, religion, sex, national origin, disability, familial status, or religious affiliation. Racial groups to be marketed to may include White, African American, Native American, Alaskan Native, Asian, Native Hawaiians or Other Pacific Islanders. Other groups who may be subject to housing discrimination include, but are not limited to, Hispanic or Latino groups, persons with disabilities, families with children, or persons with different religious affiliations.

City of Lorain - Affirmative Marketing Strategy

Applicability: Identified Groups to Receive Targeted Outreach

Based on the Limited English Proficiency (LEP) data available via HUD's AFFH data and mapping tool, 15.96% of the city's population speak Spanish and have LEP; no other languages were identified for LEP. As a result of this analysis, the following strategy shall be in place to ensure compliance with both Affirmative Marketing and Limited English Proficiency requirements.

Applicability: Programs

This Affirmative Marketing Strategy shall apply to the city and all subrecipients participating in the delivery of the following HOME funded programs:

- Owner Occupied Housing Rehab
- Down Payment Assistance

Direction of Marketing Activity

The city and all subrecipients shall provide targeted and direct outreach to the following groups, within the Lorain housing market area, which are least likely to apply for the housing because of its location or other factors without special outreach efforts:

- Hispanic or Latino individuals and families

Marketing Program: Commercial & Digital Media

The city and all subrecipients shall utilize the following types of media to advertise, in Spanish, the availability of HOME funded housing programs and housing units:

- Website publications: CityofLorain.org, City of Lorain's Facebook page.
- Newspapers or other print media - The Morning Journal and Chronicle Telegram

Marketing Program: Brochures, Signs and HUD Fair Housing Poster

The city and all subrecipients shall utilize brochures and handouts, printed in Spanish, to advertise HOME funded housing and housing programs. These materials shall be made available at the following locations:

- El Centro
- Urban League
- Public Library
- United Way
- Lorain Metropolitan Housing Authority
- Habitat for Humanity

- Nord Center

Brochures and handouts should communicate the city's Equal Housing Opportunity policy. All brochures and handouts must contain the Equal Housing Opportunity logotype.

Additionally, HUD Fair Housing Posters, printed in Spanish, shall be made posted in the following locations along with the above printed program materials:

- El Centro
- Urban League

Marketing Program: Community Partners
To further inform the groups least likely to apply about the availability of the housing and housing programs, the city and all subrecipients agree to establish and maintain contact with the following groups/originations listed below which are located within the Lorain housing market area.

Name of Group/Organization	Person to be Contacted	Method of Contact	Marketing Assistance Provided by the Group/Organization
El Centro	Maria Carrion	mcarrion@lorainelcentro.org	They will provide info to homeowners about the program
Urban League	Parris Smith	psmith@lcul.org	They will provide info to homeowners about the program
United Way	Ryan Aroney	Ryan.aroney@uwloraincounty.org	They will provide info to homeowners about the program
Lorain Metropolitan Housing Authority	Jani Justice	jjustic@lmha.org	They will provide info to homeowners about the program

The City will engage with community partners to attend community events as time permits.

Records Retention: Outreach Efforts

The city and all subrecipients shall maintain detailed records of all efforts made to affirmatively market HOME assisted housing units and housing programs. This shall include but shall not be limited to the following details related to the marketing of the HOME funded program or housing units:

- Copies of all commercial media publications
- Copies of all printed materials and posters
- Contact log for all community groups and agencies as well as details as to how the group assisted in program marketing

Records Retention: Program Beneficiaries

In accordance with HOME program guidelines and this affirmative marketing plan, the city and all subrecipients shall maintain records detailing both the applicants that were denied assistance as well as the beneficiaries of HOME funded housing units or housing programs. Applicant and beneficiary information shall include but is not limited to the following:

- Race & Ethnicity
- Income
- Age
- Female Head of Household status
- Previous housing situation

- Information related to how the beneficiary household was made aware of the HOME assisted housing unit or housing program

Annual Assessment

As part of the city's annual preparation of the Consolidated Annual Evaluation and Performance Report or CAPER, the city shall evaluate the outcomes of all CDBG and HOME funded programs. Specifically, the city shall review the racial and ethnic make-up of the program beneficiaries for the year. The city will compare the achieved outcomes to the racial and ethnic make-up of the LMI population within the jurisdiction. This comparative analysis should provide an indication as to the effectiveness of the affirmative marketing plan and related efforts. Should the actual outcomes not adequately represent the LMI make-up of the jurisdiction, this affirmative marketing plan shall be reviewed and updated as necessary.

Training & Fair Housing Promotion

Through the city's CDBG and HOME funded programs, the city shall integrate the promotion of fair housing and equal opportunity as part of future training opportunities. This can be as part of future training events for city staff, subrecipients or members of the community, as well as general fair housing promotional materials and events. All promotional materials shall be made available in both English and Spanish. (will work towards making available but will use El Centro for help with translation).

MBE/WBE/Veteran owned businesses outreach is referenced in Section 2.6 of the HOME Rehab manual.

Compliance with Affirmative Fair Housing Marketing Plan Regulations

By signing this form and adopting this plan, the City of Lorain agrees to ensure compliance with the HOME Program Affirmative Fair Housing Marketing Regulations found at 24 CFR 92.351(a)

Signature of authorizing official _____

Name (pint)__Max Upton _____

Title__Director of Building, Housing and Planning _____

Date of adoption__July 14, 2021 _____