The Southern Nevada Regional Housing Authority’s (SNRHA) Affirmative Furthering Fair Marketing Policy

It is the responsibility of the SNRHA and its contract management agents to conduct all marketing activities in an open and clear manner, with all marketing information available in both English and any other language used by at least five percent of the program eligible Limited English Proficiency (LEP) population of the locality which currently is Spanish; containing the Fair Housing logo; and in a manner that reaches those eligible families least likely to apply for housing and/or be aware of our Scattered-site and Housing Choice Voucher homeownership options; Family Self-Sufficiency Program; Family Unification and/or other Services.

1. Marketing and informational materials will:
   a. Comply with Fair Housing Act requirements on wording, logo, size of type, etc.;
   b. Describe the housing units, application process, waiting list and preference structure accurately and conduct and track outreach for its Family Self-Sufficiency Programs;
   c. Use clear and easy to understand terms and more than strictly English-language and other-language print media;
   d. Contact agencies that serve potentially qualified applicants least likely to apply (e.g. persons with disabilities or members of racial or ethnic minority groups) to ensure that accessible/adaptable units are offered to applicants who need these features and that all minorities are notified;
   e. Make clear who is eligible: low income individuals and families; working and non-working people; and people with both physical and mental disabilities; and
   f. Be clear about the SNRHA’s responsibility to provide reasonable accommodations to people with disabilities.
   g. Develop partnerships with non-profit organizations that provide services to those populations that are least likely to apply, including disabled clients for SNRHA programs and services.
   h. Advertise through minority printed media and when feasible radio and television stations to promote programs and service.
   i. Develop marketing tools such as brochures and posters that shall be distributed throughout our community as various social service offices and non-profit organizations to ensure information is available via multiple marketing outreach methods.
   j. Schedule bi-lingual staff to speak at cultural events to promote the SNRHA’s programs and services.
   k. Participate with the County of Clark in the development of its Affirmative Further Fair Housing Plan which is part of its Consolidated Plan.
   l. Ensure all participants and residents are aware of the Scattered-Site and Section 8 Housing Choice Voucher homeownership option by ensuring notices in both English and Spanish are available in all lobbies and adding a brief description for the programs to our initial and annual re-certification process.
2. In order to identify and then market effectively to those eligible families least likely to apply, SNRHA or its contractor shall, at every three years perform the following actions to document the effectiveness of its marketing and outreach strategy:

   a. Prepare a property-by-property demographic breakdown that identifies the number and percentage of residents who are:
      1) Elderly families (Head, spouse or sole member age 62 or older);
      2) Disabled families (Head, spouse or sole member is a person with disabilities);
      3) White/Caucasian families;
      4) Black/African American families;
      5) Asian families;
      6) Hawaiian/Pacific Islander families;
      7) Native American/Alaska Native families;
      8) Hispanic/Latino families;
      9) Non-Hispanic/Non-Latino families;

   b. Prepare a breakdown of each site-based waiting list and any citywide waiting list that breaks down the number and percentage of applicants by the categories listed above;

   c. Using the most recent demographic information for the City, the SNRHA shall determine the number and percentage of income eligible families, first all eligible families using the categories above, then subdividing the eligible families by income tier and the categories above as follows:
      1) Extremely low income families (incomes less than 30 percent of area median income, adjusted for family size);
      2) Very low income families (incomes between 31 and 50 percent of area median income adjusted for family size);
      3) Lower income families (incomes between 50 and 80 percent of area median income adjusted for family size).

   d. Compare the data on property demographics and waiting list demographics to the citywide eligible family data to determine whether there are any categories of eligible families who are under-served (i.e., 10 percent or more difference) by age, disability, race or ethnicity.

   e. Using data on unit turnover, determine the number, size, type (accessible, adaptable and non-accessible/adaptable) and locations of apartments likely to become vacant in the next 12 months.

   f. Review the applicable waiting lists against the likely availability projections from step (e) above, and determine whether any waiting lists that are presently closed will be re-opened.

   g. If there are any under-served categories of families including Limited English Proficiency (LEP persons) determine where those families are currently located and design a marketing campaign to reach those families.
h. The campaign should, at a minimum,
   1) be aimed at families for whom the waiting list is open;
   2) be presented in the appropriate language;
   3) use all appropriate media;
   4) describe the housing opportunities including homeownership of scattered-site units to eligible families available at SNRHA simply but accurately;
   5) contain both the Fair Housing Logo and Fair Housing language;
   6) describe how an interested family can get additional information about the Authority’s housing opportunities;
   7) be coordinated with HACVL’s LEP Outreach Plan;
   8) advertise widely within the community;
   9) making efforts to ensure the building and communications that facilitate applications and services delivery are accessible to persons with disabilities;
   10) provide fair housing counseling services or referrals to fair housing agencies;
   11) inform participants of how to file a fair housing complaint, including the toll free number for housing discrimination;
   12) recruit FSS coordinators and all other staff community;
   13) recruit landlords and service providers in areas that expand housing choice to program participants.
   14) Ensure record keeping includes race; ethnicity and familial status and disability status of program participants.

These marketing activities shall be conducted at least quarterly and shall include direct marketing activities to the population who is Limited English Proficient. Advertisement shall be printed in Las Vegas major publications, our one African American, two Spanish newspapers and other minority newspapers within Las Vegas. Additionally, we shall distribute information via facsimile to over 40 government and non-profit organizations that work directly with low-income families including those who are LEP. Radio and Television appearance shall be scheduled, to the extent possible to also promote all housing programs including scattered-site homeownership and Housing Choice Voucher Homeownership options to eligible participants. SNRHA shall maintain tracking records reflecting our efforts as it relates to affirmatively furthering fair housing opportunities.

Addendum:

SNRHA shall further ensure additional reasonable steps are taken to affirmatively further fair housing in regards to any Family Unification Vouchers awarded from HUD. These reasonable steps shall include:

1. Identifying and ensuring certifications of FUP eligible families and youth that may be placed on SNRHA’s waiting list and ensuring that the family or youth maintaining their original position on the waiting list after certification.
2. Appropriately placing all FUP eligible families and youth referred from the PCWA on the HCV waiting list in order of first come; first serve.
3. Informing applicants on how to file a fair housing complaint including the provision of the toll free number for the Housing Discrimination Hotline 1-800-669-9777.