

EASTON HOUSING AUTHORITY FAIR HOUSING MARKETING PLAN FOR STATE ASSISTED HOUSING

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EASTON HOUSING AUTHORITY (EHA) FAIR HOUSING MARKETING PLAN FOR STATE ASSISTED HOUSING

INTRODUCTION

The following Fair Housing Marketing Plan applies the EHA's state assisted public housing programs and all references herein relate to said programs.

I. FEDERAL FAIR HOUSING LAWS¹

A. The Fair Housing Act (Title VIII of the Civil Rights Act of 1968)

As amended, prohibits discrimination in the sale, rental, and financing of dwellings based on race, color, religion, sex, familial status, national origin, or disability.

B. Title VI of the Civil Rights Act of 1964

Prohibits discrimination based on race, color, or national origin in any program or activity receiving federal financial assistance.²

C. Age Discrimination Act of 1975

Prohibits discrimination based on age in any program or activity receiving federal financial assistance.

Exceptions may apply when age is used as part of criterion for a program that has a statutory age limit or is otherwise statutorily authorized.

¹ This is not intended to be an exhaustive list. A brief summary is provided for each law.

² "Program or activity" under Title VI, Section 504 of the Rehabilitation Act, and the Age Discrimination Act noted above means "all the operations" of the covered recipient of federal financial assistance.

D. Section 504 of the Rehabilitation Act of 1973³

As amended, prohibits discrimination against persons with disabilities in any program or activity receiving federal financial assistance.

E. Title II of the Americans with Disabilities Act

Prohibits discrimination against person with disabilities in all services, programs, and activities of state and local public entities.

F. The Architectural Barriers Act of 1968

Requires buildings and facilities that are constructed by or on behalf of the United States, or leased by the United States, or buildings financed in whole or in part by a grant or loan made by the United States, to be accessible to persons with disabilities.

II. MASSACHUSETTS FAIR HOUSING LAWS

A. M.G.L. c. 151B

Prohibits discrimination on the basis of race, color, religious creed, national origin, sex, age, ancestry, genetic information, veteran/military status, sexual orientation, gender identity, marital status, presence of children, disability or receipt of public assistance, including housing subsidies in the sale, rental, or lease of covered dwelling units, including publicly assisted dwelling units.

B. Massachusetts Equal Rights Law (M.G.L. c. 93, § 102)

Provides that all persons within the Commonwealth of Massachusetts, regardless of sex, race, color, creed, or national origin, shall have equal rights to make and enforce contracts, and to inherit, purchase, lease, sell, hold, and convey real and personal property.

³ “Program or activity” under Title VI, Section 504 of the Rehabilitation Act, and the Age Discrimination Act noted above means “all the operations” of the covered recipient of federal financial assistance.

C. Article CXIV of the Massachusetts Constitution

Provides that “no otherwise qualified handicapped individual shall, solely on the reason of his handicap, be excluded from the participation in, denied the benefits of, or be subject to discrimination under any program or activity within the Commonwealth.”

D. M.G.L. c 121B, § 32

Prohibits discrimination and segregation in EHA-operated housing on the basis of race, color, creed, religion, blindness or physical handicap.

III. FAIR HOUSING MARKETING PLAN

This Fair Housing Marketing Plan (“FHMP”) is adopted in accordance with the federal and state laws listed above, as well as state-aided public housing regulations at 760 CMR 4.07. Pursuant to 760 CMR 4.07, the EHA shall biennially determine whether the percentage for each minority group in the EHA’s state housing by program (i.e., elderly/handicapped program and family program) is significantly below⁴ the percentage for the minority^{5[4]} group in the city or town or in the general population of the applicable metropolitan statistical area (“MSA”), whichever is greater, and, if so, shall update and implement this FHMP to ensure affirmative outreach to the minority group.

The EHA has an ongoing responsibility to ensure that people in the local city or town, the primary MSA, and the communities from which applicants have historically applied for housing are aware of the availability of units and given an opportunity to apply. The EHA shall initiate a marketing effort whenever any of the following situations occur:

⁴ For this purpose, “significantly below” means that the percentage for each minority group in the FHA’s housing for a given program is at least one percentage point below the percentage for the minority group in the city or town or in the general population of the applicable MSA, whichever is greater. For example, if Asian households comprise 5% of residents in the FHA’s Chapter 667 housing, but 6% or more of the population in the city or town or the applicable MSA, whichever is greater, the percentage in the FHA’s housing would be deemed “significantly below”.

⁵ “Minority” has the meaning assigned to it in 760 CMR 5.03: *Definitions*.

- a. the EHA's minority tenant population is significantly (a difference of one percentage point or more) below the percentage for the minority group in Easton or the general population of the MSA, whichever is higher;
- b. the waiting list, including available MRVP vouchers, is less than the number of applicants anticipated to be placed in the next 12 months;
- c. applications for new programs or units covered by this FHMP will be accepted; or
- d. the overall minority household population (where at least one household member is a minority) is less than the EHA's Affirmative Action Goal adopted pursuant to 760 CMR 5.10(3)⁶.

⁶ If the percentage of Minority tenant households in the EHA's state-aided housing by program is not significantly below (greater than 5 percentage points) the percentage for Minorities in the general population, *the FHA currently meets its Affirmative Action Goal for that program*. See PHN 2021-14.

IV. DEMOGRAPHICS OF THE TOWN AND METROPOLITAN STATISTICAL AREA

Race/Ethnicity	% General Population, Easton, Bristol County, Massachusetts, MA	% General Population Providence-Warwick, RI-MA Metro Area	% EHA State Elderly/Handicapped Public Housing Resident Population	% EHA State Family Public Housing Resident Population
Black or African-American	4.1%	3.9%	19.20%	18.75%
Asian	2.4%	2.2%	7.60%	25.91%
Native Hawaiian or Pacific Islander	0.0%	0.0%	.05%	0.0%
American Indian or Alaskan Native	0.0%	0.0%	1.04%	0.0%
Hispanic or Latino	3.0%	7.9%	7.68%	31.25%

Conclusions:

For Elderly/Handicapped State Assisted Public Housing:

The EHA Elderly/Handicapped state assisted public housing population is within 1% of or exceeds the percentage of the general population for Easton, Massachusetts MA or Providence-Warwick, RI-MA Metro Area whichever is greater for all minority groups as defined in applicable regulations pursuant to the Department of Housing and community Development Public Housing Notice PHN 2022-03 analysis.

For Family State Assisted Public Housing:

The EHA Family state assisted public housing population is within 1% of or exceeds the percentage of the general population for Easton, Massachusetts MA or Providence-Warwick, RI-MA Metro Area whichever is greater for the following all minority groups as defined in applicable regulations pursuant to the PHN 2022-03 analysis.

V. MARKETING CONTENT – GENERALLY

- A. Marketing for EHA units will provide information, maximum opportunity, and otherwise attract eligible persons protected under federal and state fair housing laws who are less likely to apply.
- B. When undertaking marketing efforts, the EHA shall utilize the following advertising methods as determined best suited for the particular circumstances:
 - i. Advertisements will be posted on the EHA’s website in all threshold languages or with the appropriate language advisory, as determined by the EHA’s Language Access Plan adopted pursuant to 760 CMR 4.02(1)(e).

ii. The EHA maintains a web site with clear information about availability, eligibility, and application processes to inform applicants about housing opportunities at the property- especially those who have difficulty calling or visiting during business hours. Specifically, the website provides a link to the CHAMP application process. The EHA may also elect to post on social media accounts where applicable.

iii. Partnership with community contacts throughout the market area are an effective tool for reaching potential applicants who have limited internet access, limited English proficiency, or who may otherwise require assistance in applying. As appropriate, advertisements will be shared with the local fair housing commission, area religious institutions, local and regional housing agencies, civic groups, social services agencies, and other local community organizations.

Examples of other agencies for consideration may include regional Housing Consumer Education Center, area Housing corporations, area Continuum of Care, area Independent Living Center, GLAAD, United Way, area domestic violence agencies, and local community colleagues.

The EHA may modify this list as additional groups become available to serve those least likely to apply.

Examples of such agencies may include the following:

- Ames Free Library
- Be Inspired Together
- Bristol Trinity Episcopal Church
- Brockton Arts
- Children’s Museum in Easton
- Columbia Gas Heating Assistance
- Commission on Disabilities
- Community Preservation Initiative- Easton

- Congregation of Holy Cross
- Covenant Congregational Church
- Easton Baptist Church
- Easton Council on Aging
- Easton Food Pantry
- Easton Knights of Columbus
- Easton Lions Club
- Easton Music Parents Organization
- Easton Pack 193 Boy Scouts
- Easton Pack 76 Cub Scouts
- Easton Shovel Town Cultural District
- Easton Wings of Hope
- Easton Women of Today
- Easton Youth Baseball
- Easton Youth Soccer
- Evangelical Congregational Church
- Family and Community Resources
- Friends of Easton Public Gardens
- Good Shepard Presbyterian Church
- Holy Cross Church
- Holy Cross Family Ministries
- Holy Cross Fathers Community
- Holy Trinity Lutheran Church
- House of Possibilities
- H.U.G.S. II- Help Us Get Safe Immaculate Conception Church
- Immaculate Conception Church
- Kidfit Charitable Foundation
- Liberty Baptist Church
- Mom's Club of Easton

- New Hope Christian Chapel
- Old Colony YMCA
- Temple Chayai Shalom
- Unity Church of North Easton
- Volunteering for Seniors, Inc.
- Yawkey House of Possibilities

iii. When a waiting list is initially opened or closed and then reopened, or when otherwise deemed appropriate by the EHA, advertisements will be placed in the digital or print versions of local and regional newspapers, examples of such may include:

- Town Crier
- CBS Boston
- Easton Journal
- <https://www.easton.ma.us/newslist.php>


iv. When a waiting list is initially opened or closed and then reopened, or otherwise deemed appropriate by the EHA advertisements will be placed in the print versions of non-English publications (in the language of the publication) based on the prevalence of particular language groups in the regional area, examples of such publications may include:

- Sampan and/or
- Bay State Banner and/or
- El Mundo and/or
- El Planeta and/or
- The Brazilian Times, and/or
- Vocero Hispano, and/or
- El Pueblo Latino, and/or
- Journal, and/or
- Thang Long

v. Advertisements will also be disseminated by flyers and postings in public places and may also be placed on the local access cable channel. Such placement may include:

- Easton Community Access Television (ECAT)
- Comcast Channel 9/ Verizon Channel 22
- Comcast Channel 97/ Verizon Channel 23
- Comcast Channel 98/ Verizon Channel 24
- Comcast Channel 1072/ Verizon Channel 2122

v. The Boston Fair Housing Commission's MetroList may also be utilized for advertising when applicable.

- C.** Materials being used for advertisements direct potential applicants to the online application at CHAMP and indicate that paper applications may be downloaded and printed out from the DHCD website or picked up at the management office of any local housing authority. Applicants may also request that the EHA send them an application by mail.
- D.** Application information prepared by the EHA will include a statement regarding the EHA's obligation not to discriminate in the selection of applications.
- E.** The size of the advertisements, including the content of the advertisement, as well as the dates of the advertising, will be comparable across regional, local, and minority newspapers.
- F.** Where applicable, the local residency preference for state assisted housing will not be advertised so as not to discourage non-local potential applicants.
- G.** The Fair Housing logo () and slogan ("Equal Housing Opportunity") will be included in all marketing materials. All marketing will be comparable in terms of the description of the opportunity available and the dates of

marketing, regardless of the marketing type (i.e., local newspaper vs. minority newspaper).

- H.** All marketing will offer reasonable accommodations in the application process.

VI. SPECIAL EFFORTS TO ATTRACT MINORITY APPLICANTS

- A.** When the statistical data indicates the need to perform advertising to a particular minority group due to underrepresentation, the EHA will ensure that the specific resources named herein which are intended to reach the underrepresented population are included in the marketing effort. (Where applicable, emphasis will be placed on translation of advertisements for underrepresented minority groups in their LEP languages.
- B.** In addition to local and regional newspapers, where appropriate under this plan, advertisements may be placed in newspapers that serve minority groups and other groups protected under fair housing laws, these may include:
- Sampan and/or
 - Bay State Banner and/or
 - El Mundo and/or
 - El Planeta and/or
 - Brazilian Times and/or
 - Vocero Hispano and/or
 - El Pueblo Latino and/or
 - Jornal, and/or
 - Thang Long

Not all of the publications above will be utilized. At the time of marketing, the EHA may amend and update this list to ensure that newspaper serving those least likely to apply are to be utilized to assist with Fair Housing marketing efforts. The EHA will maintain data as to which publications were utilized.

Notices will also be sent to organizations to ensure affirmative outreach to under-represented minority groups identified in accordance with 760 CMR 4.07, these may include:

- Massachusetts Center for Native American Awareness, and/or
- Massachusetts Coalition for the Homeless, and/or
- Catholic Charities, and/or
- Greater Boston Interfaith Organization, and/or
- BMA Tenpoint, and/or
- Refugee and Immigrant Assistance Center, and/or
- Massachusetts Alliance of Portuguese Speakers, and/or
- Somali Development Center, and/or
- Vietnamese American Initiative for Development (VietAID), and/or
- The Asian American Civic Association, and/or
- Casa Esperanza, and/or
- Haitian Multi-Service Center, and/or
- La Alianza Hispana, and/or
- Massachusetts Commission on Indian Affairs, and/or
- METCO, and/or
- Massachusetts Office on Refugees and Immigrants, and/or
- The NAACP and/or
- Vietnamese American Initiative for Development
- Asian Community Development Corporation

- Vietnamese American Civic Association
- La Alianza Hispana Inc
- Brazilian American Association

It is possible that not all of the above organizations will be utilized. The EHA will ensure that organizations serving those least likely to apply when identified as set forth herein are utilized to assist with Fair Housing marketing efforts.

VII. OUTREACH EFFORTS TO PERSONS WITH DISABILITIES

- A. EHA will conduct outreach efforts directed towards persons with disabilities by providing a listing of accessible units to the Easton Commission on Disability and Housing Navigator Massachusetts⁷ (housingnavigatorma.org) or a successor website/registry in accordance with M.G.L. c. 151B, § 4(7A)
- B. All marketing will offer notice of reasonable accommodations in the application process. The EHA will also upon request provide application materials in alternative formats, engage in alternative means of communication through auxiliary aids and services, and/or provide assistance with the application process as necessary to ensure that persons with disabilities are reasonably accommodated and have equally effective access to the EHA's programs.

VIII. LANGUAGE ASSISTANCE FOR APPLICANTS WITH LIMITED ENGLISH PROFICIENCY

Marketing informational materials will provide notice of free language assistance to applicants, this notice of the availability will be translated into the languages of Limited

⁷ During Fall 2022, MassAccess Housing Registry was replaced with Housing Navigator MA which became the official online listing and search tool for accessible and affordable *rental* homes in Massachusetts.

English Proficiency (“LEP”) populations anticipated to apply in accordance with the EHA’s Language Access Plan.

IX. MARKETING TIMELINE

- A. When required under this policy, advertisements and /or flyers will run and/or be distributed annually a minimum of two times. The first set of will run as soon as possible and reasonable after the EHA determines that marketing efforts are necessary.
- B. All advertisements, flyers, marketing materials will be designed to attract attention.
- C. The Housing Authority will maintain a copy of the advertisement and the dates published and/or any marketing materials/ flyers sent for distribution, including the name of the agency to which it was sent and the dates sent to said agency.

IX. PLANS FOR CORRECTING NEGATIVE PROCEDURES OR POLICIES

The EHA has also reviewed City and Metropolitan Area census data aggregate minority populations to determine compliance with the HA’s affirmative action goal pursuant to state regulations. The comparative analysis used is that set forth by DHCD in PHN 2021-14.

Elderly Handicapped State-Aided Public Housing

The applicable statistics indicate that the EHA Elderly Handicapped State Aided Public Housing Development houses more minority families as defined by DHCD than the percentage of the population over the age of 55 that reside in either the Town of Easton or the Providence-Warwick, RI-MA Metro Area. Specifically, there are 8.57% of households in state assisted elderly/handicapped public housing in which at least one member identifies as a Minority whereas there is a 2.9% population age 55 and over with a Minority

race/ethnicity in the Town of Easton 6.4% age 55 and over with a Minority race/ethnicity in the Providence-Warwick, RI-MA Metro Area. (Also see Exhibit A demonstrating that the EHA has met its Affirmative Action Goal.)

Family State-Aided Public Housing

The applicable statistics indicate that the EHA Family State Aided Public Housing Development houses more minority families as defined by DHCD than the proportion of population under age 55 that reside in either the Town of Easton or the Providence-Warwick, RI-MA Metro Area. Specifically, there are 33.33% of households in state assisted family public housing in which at least one member identifies as a Minority whereas there is a 12.3% population under age 55 with a Minority race/ethnicity in the Town of Easton and 18.3% under age 55 with a Minority race/ethnicity in the Providence-Warwick, RI-MA Metro Area. (Also se Exhibit A demonstrating that the EHA has met its Affirmative Action Goal.)

XI. MONITORING EFFECTIVENESS AND UPDATES AND STAFF TRAINING

- A. Applicable Staff will be informed of the contents of the FHMP. All staff receive training on Fair Housing.
- B. This FHMP will be reviewed every on a biennial basis and updates if needed as a result of changes to the area population, resident population or both.
- C. Residents and applicants are requested to provide demographic information in which applicants may disclose race ethnicity and disability status. This information is maintained in the EHA's system and reports can be run in aggregate form.

XII. POSTING

The FHMP will be posted in the development office together with the appropriate language advisory and a copy of the State and Federal Fair Housing poster.

Appendix A. Fair Housing Form

The Fair Housing Form in CHAMP will provide areas for LHAs to record their data and calculate their Affirmative Action Goal and placement rate. Additionally, LHAs will be able to use the form to generate documents for Board Approval and submittal to DHCD.

Fair Housing Form
Family Housing
<ul style="list-style-type: none"> Town Data: 12.3 % <i>under age 55</i> with a Minority race/ethnicity
<ul style="list-style-type: none"> MSA Data: 18.3% of population <i>under age 55</i> with a Minority race/ethnicity.
<ul style="list-style-type: none"> EHA Data: 33.33 % of households in family housing in which at least one member identifies as a Minority
<ul style="list-style-type: none"> Difference between City/Town/MSA data and LHA data (-15.03%)
<ul style="list-style-type: none"> Affirmative Action Goal: 18.3% (EHA exceeds the goal)
<ul style="list-style-type: none"> Placement rate N/A
Elderly/ Handicapped Housing
<ul style="list-style-type: none"> Town: 2.9 % of population <i>age 55 and over</i> with a Minority race/ethnicity
<ul style="list-style-type: none"> MSA Data: 6.4 % of population <i>age 55 and over</i> with a Minority race/ethnicity
<ul style="list-style-type: none"> EHA Data: 8.57% of households in elderly/handicapped housing in which at least one member identifies as a Minority
<ul style="list-style-type: none"> Differences between City/Town/MSA data and LHA data: (- 2.17%)
<ul style="list-style-type: none"> Affirmative Action Goal: 6.4% Met (EHA exceeds the goal)
<ul style="list-style-type: none"> Placement rate N/A