**City of Lawrence CDBG/HOME Programs**  
**Grant Application**  
Revised 12/2021

**Organization Name:** Lawrence Habitat for Humanity  
**Mailing Address:** 2108 W. 27th St., Ste. C, Lawrence, KS 66047  
**DUNS Number:** 969590574  
**Contact Name:** Erika Zimmerman  
**Contact Title:** Executive Director  
**Email:** director@lawrencehabitat.org  
**Website:** www.lawrencehabitat.org

**Organization Mission Statement:**

Lawrence Habitat for Humanity brings people together to build homes, communities and hope.

**Proposed Program or Activity Name:** New Construction - Affordable Homes #109 & #110  
**Proposed Program Address:** 8th & Walnut, Lawrence, KS  
**Brief summary of Proposed Program or Activity:**

Construction of two new, permanently affordable single-family ownership housing units. Both projects will leverage private funds and volunteer labor to construct the homes with Lawrence Habitat providing a no-interest mortgage loan to two qualified Habitat partner families with household incomes equal to or less than 60% of area median income.

**Funding Requested:** $ 50,000  
**Request is:** 13 % of project budget and 5 % of organization budget  
**Which National Objective will be met?** Affordable Ownership Housing  
**Which Local Priority will be met?** Availability of affordable owner housing

**Certification:**

"I certify that I have reviewed this application and that, to the best of my knowledge and belief, all of the information provided is true and correct. I also certify that I am officially authorized to represent the submitting organization by its governing board in the filing of this application."

**Signature:** [Signature]  
**Date:** 2/9/2023  
**Print Name and Title:** Erika Zimmerman, Executive Director

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**FOR HOUSING INITIATIVES STAFF USE ONLY**

**Date Received:**  
**Application:** Complete □  
Incomplete □  
**Received by:**

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<th>Method Received</th>
<th>Mail □</th>
<th>Hand Delivery □</th>
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Lawrence Habitat for Humanity
Proposal for New Construction of Affordable Homes #109 & #110

Narrative

1. What is the situation, problem or opportunity this grant will address?
Housing needs exist in every community, including ours. For many families, safe, adequate, and affordable housing isn’t a reality. Locally, almost half (49%) of all renters and one in four homeowners can’t afford their housing costs. The lowest-income households are the most likely to be severely cost burdened, but even moderate-income earners in Lawrence struggle to find affordable housing. According to research by the Center on Budget & Policy Priorities, an estimated 42% of children live in households that struggle to meet routine expenses like food, rent or mortgage, car payments, and medical bills. Lawrence suffers from a high level of housing cost burden as a result of high rents, low inventory of available units, high home values, and low wages.

Lawrence Habitat for Humanity develops workforce housing ownership opportunities for low-income families making less than 60% of the median household income. 40% of Lawrence residents make $40,000 or less annually, yet the average purchase price of a house in Lawrence is $295,000, up 5.4% from last year. Our working families form the backbone of Lawrence’s economy filling jobs in retail, hospitality, maintenance, clerical, manufacturing and transportation services. Stable, reliable, and affordable home ownership opportunities for families ultimately provides a stable, reliable community.

Using a layered approach to construction financing, Lawrence Habitat combines private contributions with governmental and corporate grants to underwrite the cost of building homes. Coupled with significant volunteer resources and its professional staff, Lawrence Habitat has consistently built 2-3 single family housing units per year for over 30 years. Lawrence Habitat is requesting HOME Funds to assist in the development of two housing units in 2024.

This grant proposal requests $50,000 to underwrite a portion of the construction costs for two units of ownership housing. This request would represent 13% of the funding for two energy efficient, permanently affordable homes for two working families making no more than 60% median income.

2. How will the program or activity address one of the outcome areas identified in the City’s Strategic Plan?
Lawrence Habitat for Humanity seeks to be a partner and catalyst in building a community where everyone has the opportunity to thrive. Lawrence Habitat brings people together not only as a way to deliver a product – improved housing – but as an essential process for building hope and belief that healthier communities are achievable and beneficial for all.
This vision aligns with three outcome areas of the City’s Strategic Plan which are (a) Strong, Welcoming Neighborhoods, (b) Safe and Secure, and (c) Prosperity and Economic Security. By increasing the availability of affordable ownership housing, Lawrence Habitat and the City of Lawrence will bring people and resources together to build affordable homes, stable communities, and self-reliant families.

3. How will the program or activity address priority needs outlined in the Consolidated Plan?
Lawrence Habitat’s mission of building affordable housing directly addresses the priorities of available affordable owner housing and neighborhood improvement and stability. With funding, Lawrence Habitat will partner with two families to build their own affordable houses.

4. How will this grant support the mission of the organization?
This grant would directly support Lawrence Habitat’s mission of bringing the community and resources together to build affordable homes, stable communities, and self-reliant families.

5. How many people will be served by this grant and what percentage are low-moderate income (describe method of verification)?
This grant will help provide two housing units that will serve two low-income families with an income under 60% of the area median income. Families are determined through a selection process including an application, employment verification, federal tax returns, and other means. Household income must be stable for at least one year prior to acceptance into the program.

6. What resources are currently available to dedicate to the program or activity, including staff, volunteers, existing funds and community partners?
Lawrence Habitat has a large and dedicated group of volunteers that are involved throughout the entire project including the family selection process, resource development, and home construction. The organization is lead by a professional staff of seven full and part-time professionals including the Executive Director, Construction Manager, Home Repair & Volunteer Manager, ReStore Manager, and a Development Manager. Lawrence Habitat works with a wide variety of community partners and project sponsors including local civic groups and charitable foundations, corporations and businesses, and the faith community. The major sponsor for House #109 is the Lawrence Women Build Committee and the major sponsor for #110 is the ReCreate/Blueprint Committee. Additional project sponsors and fund development activities are identified and planned for the 2024 build cycle that would include these two proposed builds. The units will be built at approximately 8th and Walnut where Lawrence Habitat has already built 5 homes, creating a sense of community and camaraderie with other Habitat families. The environmental review has previously been completed for this site for past builds.
7. How is this approach to the issue unique or collaborative and what gives it a high likelihood of success?
The Habitat model is unique and highly collaborative in many ways and has proven successful for over 30 years at Lawrence Habitat. For this project, private funds and corporate sponsorship grants will be leveraged with modest levels of HOME Funds and coupled with hundreds of volunteer construction hours that will result in an affordable housing option for a selected low income partner household. The Habitat homebuyer will receive an interest free mortgage with payments guaranteed to remain less than 30% of household income over a 30-year mortgage period. The home will remain permanently affordable through deed restrictions and/or mortgage covenants.

Habitat partner families are carefully chosen based upon: 1) their housing need and desire to own a home, 2) their ability to re-pay a mortgage and 3) their willingness to partner and invest 200 hours of sweat equity hours in their home and other Habitat homes and save $1,200 for closing costs. Each family must demonstrate a history of stable income and an acceptable credit history. This level of commitment helps insure a high probability of success and a high level of motivation to succeed at home ownership.

8. How will success be measured and how will you continue to fund this project once grant funds are expended?
Lawrence Habitat is requesting $50,000 in HOME funding to be used toward the construction of two new homes. Long-term success is measured by a homeowner paying off their mortgage while paying property taxes and maintaining their home in a quality manner to preserve the asset as a long term financial asset to the family and the neighborhood. Additional long-term success outcomes include improvement in educational scores by Habitat children, increased positive health outcomes as a result of a cleaner and safer living environment and a higher level of civic and cultural engagement as a result of permanent residency in a community.

Short term success is measured by a partner family fulfilling all program requirements, executing a purchase mortgage and making monthly mortgage payments on time while experiencing a higher level of family stability and financial security.

Over its 34 years of operation, Lawrence Habitat has achieved a strong and diversified revenue stream including a wide range of private funders and donors as well as mortgage payment income and income from its wholly owned social enterprise, Habitat ReStore. These varied funding sources provide a stable and on-going source of income that helps insure stable operations and project support.

9. What is the organization’s timeline for achieving the objectives of the grant?
Fund raising and homebuyer selection for the proposed project will begin in 2023 with construction of the first housing unit beginning early 2024 with completion by early spring 2024, followed directly by construction of the second housing unit. Completion of the second home is set for summer 2024.
8. What other funding sources have been approached and what have the responses been?
Given that the proposed project is almost a year from launch, all funding sources cannot be listed at this time. The major sponsors for both House #109 and House #110 have been identified. Funding from the Rice Foundation and Lawrence Habitat’s broad base of individual donors has already been secured. Additional sponsors and donors, civic groups and churches and the corporate business community have been identified as prospective financial supporters, and grant funding with HOME funds will be used as leverage when confirming sponsorship opportunities. Lawrence Habitat has a long and successful track record of leveraging limited governmental or foundation grant funding with private sector contributions to achieve program goals.
# Proposed Grant Budget

**Lawrence Habitat Home #109 & #110**

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<tr>
<th>Budget Items</th>
<th>Explanation</th>
<th>HOME Funds</th>
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<td>Footings and Foundations</td>
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<td>Wall Framing</td>
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**Note**

Any and all funds that are awarded will go directly and exclusively towards the cost of the construction of the home.

**TOTAL PROJECT**

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<tr>
<th>HOME Funds</th>
<th>Other Funds</th>
<th>Total Funds</th>
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<td>50,000</td>
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## 2022-2023 Board of Directors

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<thead>
<tr>
<th>Name:</th>
<th>Phone #:</th>
<th>Employment</th>
<th>Email:</th>
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</thead>
<tbody>
<tr>
<td>Jacob Brewer</td>
<td>785-979-6309</td>
<td>Clark Huesemann</td>
<td><a href="mailto:jbrewer@clarkhuesemann.com">jbrewer@clarkhuesemann.com</a></td>
</tr>
<tr>
<td>George Diepenbrock</td>
<td>785-423-0505</td>
<td>Douglas County Sheriff Office</td>
<td><a href="mailto:g.diepenb@outlook.com">g.diepenb@outlook.com</a></td>
</tr>
<tr>
<td>Mack Curry</td>
<td>702-606-0445</td>
<td>Riling Law Office</td>
<td><a href="mailto:Mack.currylll@outlook.com">Mack.currylll@outlook.com</a></td>
</tr>
<tr>
<td>Heidi Garcia</td>
<td>785-760-0877</td>
<td>Watkins Memorial Health Center</td>
<td><a href="mailto:hmgarcia@ku.edu">hmgarcia@ku.edu</a></td>
</tr>
<tr>
<td>Leah Henderson-President</td>
<td>785-423-0146</td>
<td>Body Specific</td>
<td><a href="mailto:office@bodyspecificllc.com">office@bodyspecificllc.com</a></td>
</tr>
<tr>
<td>Chad Hess</td>
<td>785-766-7619</td>
<td>Elliott Insurance Group</td>
<td><a href="mailto:chad@elliottinsurancegroup.com">chad@elliottinsurancegroup.com</a></td>
</tr>
<tr>
<td>Evan Holt</td>
<td>785-640-8923</td>
<td>Keller Williams Real Estate</td>
<td><a href="mailto:Evan.holt@kw.com">Evan.holt@kw.com</a></td>
</tr>
<tr>
<td>Chris Mann</td>
<td>785-979-2204</td>
<td>Mann Law Firm</td>
<td><a href="mailto:Chrismann9808@gmail.com">Chrismann9808@gmail.com</a></td>
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<tr>
<td>Kristina Mease-V.President</td>
<td>620-757-6672</td>
<td>Small Business Development Ctr.</td>
<td><a href="mailto:kristinamease@ku.edu">kristinamease@ku.edu</a></td>
</tr>
<tr>
<td>Maria Pope</td>
<td>785-766-0456</td>
<td>USD 497</td>
<td><a href="mailto:popetwin@gmail.com">popetwin@gmail.com</a></td>
</tr>
<tr>
<td>Karena Schmitendorf</td>
<td>530-902-4334</td>
<td>EXP Realty</td>
<td><a href="mailto:kschmitendorf@gmail.com">kschmitendorf@gmail.com</a></td>
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<tr>
<td>Stacy Simmons</td>
<td>785-424-4396</td>
<td>Douglas County Sheriff Office</td>
<td><a href="mailto:ssimmons@dgso.edu">ssimmons@dgso.edu</a></td>
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<tr>
<td>Doug Tilghman- Treasurer</td>
<td>785-691-6350</td>
<td>Retired Consultant</td>
<td><a href="mailto:xjayhawk72@gmail.com">xjayhawk72@gmail.com</a></td>
</tr>
<tr>
<td>Jared Todd- Secretary</td>
<td>217-257-5522</td>
<td>RCB Bank</td>
<td><a href="mailto:jtod@bankrcb.net">jtod@bankrcb.net</a></td>
</tr>
<tr>
<td>Robyn Wagner</td>
<td>785-341-4166</td>
<td>Bert Nash</td>
<td><a href="mailto:rwagner@bertnash.org">rwagner@bertnash.org</a></td>
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<tr>
<td>Demetria White</td>
<td>785-979-3730</td>
<td>Bella Hair Extension Color Studio</td>
<td><a href="mailto:demetria@rueschhoffs.com">demetria@rueschhoffs.com</a></td>
</tr>
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</table>

## Staff:

<table>
<thead>
<tr>
<th>Name:</th>
<th>Phone #:</th>
<th>Email:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Erika Zimmerman, Executive Director</td>
<td>913-369-7037</td>
<td><a href="mailto:director@lawrencehabitat.org">director@lawrencehabitat.org</a></td>
</tr>
<tr>
<td>Cass Fraga, ReStore Manager</td>
<td>913-353-4134</td>
<td><a href="mailto:cass@lawrencehabitat.org">cass@lawrencehabitat.org</a></td>
</tr>
<tr>
<td>Barb Armbrister, Office Manager</td>
<td>785-832-0777</td>
<td><a href="mailto:barb@lawrencehabitat.org">barb@lawrencehabitat.org</a></td>
</tr>
<tr>
<td>Adrian Jacobs, Procurement Coordinator</td>
<td>913-297-2814</td>
<td><a href="mailto:restore@lawrencehabitat.org">restore@lawrencehabitat.org</a></td>
</tr>
<tr>
<td>Josh Ostermann, Construction Manager</td>
<td>785-218-6684</td>
<td><a href="mailto:construction@lawrencehabitat.org">construction@lawrencehabitat.org</a></td>
</tr>
<tr>
<td>Jesse Rice, Home Repair &amp; Volunteer Manager</td>
<td>785-813-6406</td>
<td><a href="mailto:hps@lawrencehabitat.org">hps@lawrencehabitat.org</a> <a href="mailto:construction@lawrencehabitat.org">construction@lawrencehabitat.org</a></td>
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<tr>
<td></td>
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<td><a href="mailto:volunteer@lawrencehabitat.org">volunteer@lawrencehabitat.org</a></td>
</tr>
<tr>
<td>Stacie Schroeder, Development Manager</td>
<td>785-221-9221</td>
<td><a href="mailto:stacie@lawrencehabitat.org">stacie@lawrencehabitat.org</a></td>
</tr>
<tr>
<td>Susan Schott, Administrative Assistant</td>
<td>785-832-0777</td>
<td><a href="mailto:susan@lawrencehabitat.org">susan@lawrencehabitat.org</a></td>
</tr>
</tbody>
</table>

Lawrence Habitat for Humanity office- 785-832-0777
2021: A Year in Review

Lawrence Habitat ReStore plays an integral part in Habitat’s mission, bringing financial support to our work while also offering a unique shopping opportunity to the community. In the last year, the Lawrence Habitat ReStore diverted over 215 tons from the landfill, accepting hard-to-dispose-of items including new and used furniture, appliances, and surplus building materials.

Mortgage Assistance

One of the homeowners we assisted with mortgage assistance reached out because their spouse works in the health care industry. In their line of work, this individual was regularly exposed to COVID. As part of the COVID protocol for this individual’s work, they were sent home, without pay, to await test results after exposure. Throughout the course of several months, this individual was put on COVID protocol multiple times, going without 2-3 days of pay each week for a number of consecutive weeks. Trying to make ends meet and paying their mortgage caused this family monumental stress, making them the ideal candidate for mortgage assistance.

Lawrence Habitat was able to assist 15 families with mortgage assistance totaling over $10,000 in support.

Critical Repair & Aging in Place

According to the Center for Disease Control and Prevention (www.cdc.gov), people spend 50% or more of every day inside their homes, therefore making a person’s housing environment one of the major influences on health and well-being. By offering critical repair, in addition to our Aging in Place program, Lawrence Habitat provides necessary repairs to help families remain in their home safely and independently without worrying about the financial burden repairs may cost.

In 2021, Lawrence Habitat for Humanity completed 11 Aging in Place projects and 6 Critical Repairs in our service area.

Lawrence Habitat ReStore

Lawrence Habitat for Humanity ReStore plays an integral part in Habitat’s mission, bringing financial support to our work while also offering a unique shopping opportunity to the community. In the last year, the Lawrence Habitat ReStore diverted over 215 tons from the landfill, accepting hard-to-dispose-of items including new and used furniture, appliances, and surplus building materials.

Source of Funds - FY 2021

- Mortgage Payments: $179,946
- Sale of Homes*: $99,980
- Special Events: $31,390
- Contributions & Grants: $267,482
- Affiliate & ReStore Operations & Management: $421,396
- Fundraising: $50,128
- Restore Sales: $184,933

*constructed asset

Use of Funds - FY 2021

- Program: $247,041
- Affiliate & ReStore Operations & Management: $421,396
- Restore Sales: $184,933
- Fundraising: $50,128

VOLUNTEER EFFORTS

- # of Volunteers: 342
- # of Volunteer Hours: 8,996

A Look Ahead... 2022 Calendar of Events

- Thursday, June 16, 2022, 5:30 - 7:00 pm
  House #105 Open House (Eudora)
- Friday, July 15, 2022, 7:00 pm
  Blueprint Bash Trivia (DoubleTree by Hilton Hotel Lawrence)
- Friday, September 30, 2022, 7:00 pm
  Women Build Gala (Maceli’s)
- Sunday, December 4, 2022, 12:00 - 5:00 pm
  Holiday Homes Tour (Lawrence Habitat ReStore)

For more information on an upcoming event, please contact Stacie at stacie@lawrence.habitat.org.

2021 Build Progress: House #104 & House #105

"I just want to say thank you to all the volunteers you all worked so hard and are selfless, you helped me make my dream of owning my own home come true. Now, I can provide the stability for my daughter. Words can’t truly express how I feel except to say I feel like I can breathe for the first time in a long time. My family’s next chapter can now begin!" - Sarah Ready, 104th Homeowner

Lawrence Habitat for Humanity started and finished House #104 amidst the COVID pandemic with limited volunteers, masks, and social distancing on the build site. House #104 was Lawrence Habitat’s 10th Women Build sponsored home, and was completed by a small, but dedicated crew of volunteers. On, July 17th, we celebrated with Sarah Ready and her daughter, at their Home Dedication ceremony.

In the fall of 2020, Lawrence Habitat partnered with Douglas County and the City of Eudora to submit a grant to the Kansas Housing Resource Corporation to construct affordable housing in Douglas County. The grant proposed building four moderate-income houses in Eudora. The grant was approved at the end of 2020, and, after many months of work, building began on the three-bedroom, two-bathroom homes in early September 2021. The goal is to build the four homes consecutively over the next several months.

One of the homeowners we assisted with mortgage assistance reached out because their spouse works in the health care industry. In their line of work, this individual was regularly exposed to COVID. As part of the COVID protocol for this individual’s work, they were sent home, without pay, to await test results after exposure. Throughout the course of several months, this individual was put on COVID protocol multiple times, going without 2-3 days of pay each week for a number of consecutive weeks. Trying to make ends meet and paying their mortgage caused this family monumental stress, making them the ideal candidate for mortgage assistance.

Lawrence Habitat was able to assist 15 families with mortgage assistance totaling over $10,000 in support.

**Title VI of the Civil Rights Act of 1964**
Title VI of the Civil Rights Act of 1964 provides that no person in the United States shall on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.¹

**Executive Order 13166**
Executive Order 13166 is titled Improving Access to Services for Persons with Limited English Proficiency. It was issued by President Clinton in 2000 to direct federal agencies to evaluate services provided and implement a system that ensures that Limited English Proficiency persons are able to meaningfully access the services provided consistent with and without unduly burdening the fundamental mission of each federal agency. The Executive Order includes the statement below.

> Each Federal Agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency’s programs and activities.²

**Department of Housing and Urban Development Final Guidance**

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WHAT IS LIMITED ENGLISH PROFICIENCY?

Most individuals living in the United States read, write, speak, and understand English. There are many individuals, however, for whom English is not their primary language. If these individuals have a limited ability to read, write, speak or understand English, they are limited English proficient, or “LEP.”

Language for LEP persons can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by federally funded programs and activities.

HUD’s regulation, 24 CFR Part 1, “Nondiscrimination in Federally Assisted Programs of the Department of Housing and Urban Development—Effectuation of Title VI of the Civil Rights Act of 1964,” requires all recipients of federal financial assistance from HUD to provide meaningful access to LEP persons. Pursuant to Executive Order 13166, the meaningful access requirement of the Title VI regulations and the four-factor analysis set forth in this LEP Guidance are to additionally apply to the programs and activities of federal agencies, including HUD.

LEP FOUR-FACTOR ANALYSIS

Recipients are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. While designed to be a flexible and fact-dependent standard, the starting point is an individualized assessment that balances the following four factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee;
2. The frequency with which LEP persons come in contact with the program;
3. The nature and importance of the program, activity, or service provided by the program to people’s lives; and
4. The resources available to the grantee/recipient and costs.

The intent of the HUD guidance is to suggest a balance that ensures meaningful access by LEP persons to critical services while not imposing undue burdens on small business, small local governments, or small nonprofit entities.

FACTOR 1: THE NUMBER OR PROPORTION OF LEP PERSONS ELIGIBLE TO BE SERVED OR LIKELY TO BE ENCOUNTERED BY THE PROGRAM OR GRANTEE

The program area of LHfH consists of those individuals residing with Douglas County, KS with the vast majority of individuals served residing in the City of Lawrence. To identify the number or proportion of LEP persons served or encountered, 2010-2014 American Community Survey 5-Year Estimates for the City of Lawrence and Douglas County were used.

Individuals who self-identified as “Speak English Not Well or Not At All” were utilized in this analysis.

4 According to the 2010-2014 American Community Survey, more than 25 million persons living in the United States reported that they were LEP.

5 24 CFR part 1 – http://www.ecfr.gov/cgi-bin/text-idx?SID=f9f9c637d99813f2e854a38a4f2852f8&mc=true&node=pt24.1.1&rgn=div5
Table 1 shows the number and the proportion of persons who are five years of age or older and who are identified as being LEP. As Table 1 discloses, only 1.7% of persons residing within the City of Lawrence and 1.5% of persons residing within Douglas County are identified as being LEP.

Table 1: Identifying Limited English Proficient Individuals

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>Total Population: 5 Years &amp; Over</th>
<th>Speak English Less Than Well</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kansas</td>
<td>2,882,946</td>
<td>61,330</td>
<td>2.1%</td>
</tr>
<tr>
<td>Douglas County</td>
<td>113,703</td>
<td>1,655</td>
<td>1.5%</td>
</tr>
<tr>
<td>Lawrence</td>
<td>90,194</td>
<td>1,559</td>
<td>1.7%</td>
</tr>
</tbody>
</table>

Data Source: 2010-2014 American Community Survey 5-Year Estimates (Tables B01003 and B16005). ACS data is an estimate so these numbers have a certain level of margin of error associated with them.

Table 2, also derived from the 2010-2014 American Community Survey 5-Year Estimates, shows the number of LEP persons living in Lawrence and the three most common languages families spoken by LEP persons living in Lawrence (five years of age or older). Table 2 shows the following:

- 0.8% of the entire Lawrence population are Spanish speakers who speak “Speak English Less Than Well”;
- 0.7% of the entire Lawrence population are Asian & Pacific Island Language speakers (including Chinese, Vietnamese, Thai, Laotian, Korean and Japanese) who “Speak English Less Than Well”;
- 0.14% of the entire Lawrence population are Indo-European Language speakers (including Dutch, Italian, Russian, Portuguese, French or German) who “Speak English Less Than Well”; and
- Just under 0.1% of the entire Lawrence population are speakers of languages other than those otherwise identified who “Speak English Less Than Well”.

Table 2: Language Spoken by LEP Persons

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>Total Population: 5 Years &amp; Over</th>
<th>Speak English Less Than Well</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kansas</td>
<td>2,882,946</td>
<td>46,814</td>
<td>1.6%</td>
</tr>
<tr>
<td>Douglas County</td>
<td>113,703</td>
<td>122</td>
<td>0.1%</td>
</tr>
<tr>
<td>Lawrence</td>
<td>90,194</td>
<td>708</td>
<td>0.8%</td>
</tr>
</tbody>
</table>

Data Source: 2010-2014 American Community Survey 5-Year Estimates (Tables B01003 and B16005). ACS data is an estimate so these numbers have a certain level of margin of error associated with them.
HUD has adopted a “safe harbor” for translation of written materials. The Guidance identifies actions that will be considered strong evidence of compliance with Title VI obligations. The table below sets forth “safe harbors” for written translations. Failure to provide written translations under these cited circumstances does not mean that the recipient is in noncompliance. Rather, the “safe harbors” provide a starting point for recipients to consider:

- Whether and at what point the importance of the service, benefit, or activity involved warrants written translations of commonly used forms into frequently encountered languages other than English;
- Whether the nature of the information sought warrants written translations of commonly used forms into frequently encountered languages other than English;
- Whether the number or proportion of LEP persons served warrants written translations of commonly used forms into frequently encountered languages other than English; and
- Whether the demographics of the eligible population are specific to the situations for which the need for language services is being evaluated. In many cases, use of the “safe harbor” would mean provision of written language services when marketing to the eligible LEP population within the market area. However, when the actual population served (e.g., occupants of, or applicants to, the housing project) is used to determine the need for written translation services, written translations may not be necessary.

The table below sets forth “safe harbors” for written translations.

<table>
<thead>
<tr>
<th>Size of language group</th>
<th>Recommended provision of written language assistance</th>
</tr>
</thead>
<tbody>
<tr>
<td>1,000 or more in the eligible population in the market area or among current beneficiaries</td>
<td>Translated vital documents</td>
</tr>
<tr>
<td>More than 5% of the eligible population or beneficiaries and more than 50 in number</td>
<td>Translated vital documents</td>
</tr>
<tr>
<td>More than 5% of the eligible population or beneficiaries and 50 or less in number</td>
<td>Translated written notice of right to receive free oral interpretation of documents</td>
</tr>
<tr>
<td>5% or less of the eligible population or beneficiaries and less than 1,000 in number</td>
<td>No written translation is required</td>
</tr>
</tbody>
</table>

In sum, no LEP language group has more than 1,000 in number in the program area, and only 1.5% of the total population within the program area is identified as being LEP. The largest majority of LEP persons within the program area speak either Spanish or an Asian and Pacific Islander language.

**Factor 2: The frequency with which LEP persons come in contact with the program**
While relatively small, the LEP population in the Lawrence program area is growing, increasing the probability that LHfH will interact with LEP persons in the future. However, to date, LHfH has received no requests, formal or otherwise, by LEP persons seeking the translation of documents or interpreters at public meetings.
**FACTOR 3: THE NATURE AND IMPORTANCE OF THE PROGRAM, ACTIVITY, OR SERVICE PROVIDED BY THE PROGRAM TO PEOPLE’S LIVES**

Federal HOME Funds are regularly used by LHfH in its affordable housing production program and positively impacts the lives of many LHfH applicant households. Other activities, including direct client services or home ownership education programs, are important to all LHfH partner families and could have interaction with LEP individuals.

**FACTOR 4: THE RESOURCES AVAILABLE TO THE GRANTEE/RECIPIENT AND COSTS**

The fourth and final factor of the analysis weighs the preceding three factors to assess the needs of LEP persons within the program area against the resources available to LHfH and the costs of providing access. As shown above, there is a very small population of LEP persons within the City of Lawrence. Given the small size of the LEP population, there does not appear to be a need to produce documents, programs, and general information in languages other than English. Moreover, based on the LHfH budget, such a plan would, at the present time, be cost prohibitive. This LEP Plan will be reviewed on an ongoing basis to assess whether there are any significant changes in need to provide meaningful access to LEP persons.

**LANGUAGE ACCESS PLAN**

**IDENTIFYING LEP INDIVIDUALS WHO MAY NEED ASSISTANCE**

When encountering a LEP person, LHfH staff will use *Language Identification Flashcards* to identify that person’s primary language. The Census Bureau developed the flashcards, which can be accessed at [www.lep.gov/ISpeakCards2004.pdf](http://www.lep.gov/ISpeakCards2004.pdf).

The LHfH will also make *Language Identification Flashcards* available to the public through its website, at all public meetings, and in the Development Services office.

Once a LEP person’s primary language is identified using the flashcards, LHfH staff will assess the feasibility of providing written translation service and/or oral interpretation assistance for the LEP person. LHfH will keep an active file of available translation services available in the LHfH office.

**LANGUAGE ASSISTANCE MEASURES**

In the event LHfH should receive a request for assistance in a language other than English, staff members will take the name and contact information of the person and will arrange for translation or translator services depending upon the request. The University of Kansas, through its various language departments, may also provide assistance. Finally, if the required language is not available and formal interpretation is required, staff shall use the telephone interpreter service, Language Line at 1-800-752-6096.

The LHfH website may be translated into a number of different languages using a free online translation services such as *Google Translate*. Similarly, agendas, minutes, and other documents posted online, can be translated as well.

Outside of those services, because LHfH staff is small and does not possess in-house translation capabilities or expertise, LHfH staff can only assist LEP persons, but cannot accurately assess or guarantee the accuracy of translation services provided by others. If there is an expressed need for other translation methods such as Sign Language or Braille materials, LHfH will determine
the feasibility and possibilities of providing these services as well. Within its limited budget and capabilities, LHfH pledges that it will, to the best of its abilities, provide meaningful access to LEP persons.

LHfH STAFF TRAINING
Current staff members and incoming staff members will be briefed on LHfH’s LEP Plan and how to assist LEP persons. They will also be instructed to keep a record of language assistance requests so that needs may be accurately assessed in the future.

DISSEMINATION
LHfH will maintain copies of this LEP Plan in its administrative offices. Any person or agency requesting a copy of the LEP Plan will be provided a copy.

COMPLAINTS
Individuals may file administrative complaints with HUD alleging violations of Title VI because the HUD recipient failed to take reasonable steps to provide meaningful access to LEP persons. The local HUD office will intake the complaint, in writing, by date and time, detailing the complainant’s allegation as to how the HUD recipient failed to provide meaningful access to LEP persons. HUD will determine jurisdiction and follow up with an investigation of the complaint.

If a person believes that a HUD federally assisted recipient is not taking reasonable steps to ensure meaningful access to LEP persons, that individual may file a complaint with HUD’s local Office of Fair Housing and Equal Opportunity (FHEO). For contact information of the local HUD office, go to http://www.hud.gov or call the housing discrimination toll free hotline at 800–669–9777 (voice) or 800–927–9275 (TTY).