

Assessment of Fair Housing



2023 Update

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2023 Update to the City of Lawrence Assessment of Fair Housing

Background

U.S. Department of Housing and Urban Development (HUD) grantees must regularly certify compliance with the Fair Housing Act's Affirmatively Furthering Fair Housing (AFFH) requirement. The Fair Housing Act prohibits among other things, discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions because of race, color, religion, sex, familial status, national origin, or disability. It also extends beyond this non-discrimination mandate, requiring HUD to administer its programs and activities relating to housing and urban development in a manner that affirmatively furthers the purposes of the Act. Courts have found that this requires HUD grantees to go beyond simply avoiding and barring discriminatory practices. HUD grantees must take meaningful steps to affirmatively further the Fair Housing Act's objectives, such as acting to desegregate communities.

In the years prior to 2015, HUD implemented the AFFH mandate by requiring each grantee to complete an analysis of impediments to fair housing choice (AI). It did not have a process in place to systematically verify compliance.

The 2015 AFFH rule established a process by which grantees had to conduct a more extensive analysis of local fair housing concerns, called an Assessment of Fair Housing (AFH), commit to specific steps to remedy them, and then submit their AFH to HUD for review. It also created a regulatory definition of the AFFH requirement to clarify the substantive expectations HUD had for grantees.

The 2015 AFFH rule succeeded in encouraging program participants to make more serious and concrete commitments to AFFH by, for example, fostering the development of affordable housing and creating eviction protection programs. However, the creation and review of the program participants' AFHs proved to be unnecessarily burdensome for some program participants and HUD. The last administration stopped the AFH process soon after it had started. Initially, it maintained the regulatory definition of the AFFH requirement.

In the summer of 2020, the prior administration replaced the 2015 AFFH rule with a rule called "Preserving Neighborhood and Community Choice" (PCNC) without going through the required notice and comment process. The PCNC rule not only rescinded the 2015 AFFH rule, but also redefined the term "Fair Housing" as well as the Fair Housing Act's AFFH obligation to eliminate much of HUD grantees' responsibility to address fair housing issues.

On June 10, 2021, HUD published in the Federal Register an interim final rule (IFR), entitled Restoring Affirmatively Furthering Fair Housing Definitions and Certifications, to restore meaningful implementation of the Fair Housing Act's AFFH requirement.

The AFFH IFR restores certain definitions and certifications from the 2015 Rule, which are grounded in legal precedent, to HUD's regulations implementing the Fair Housing Act's requirement to AFFH. HUD grantees thus will once again be regularly certifying compliance to a standard that requires them to take meaningful action to combat residential segregation and eliminate unequal access to housing-related opportunities.

The AFFH IFR went into effect on July 31, 2021. The IFR rescinds the PCNC rule. The IFR does not restore the 2015 AFFH rule's procedural provisions that governed how HUD grantees conducted fair housing planning and how HUD reviewed their planning work.

The IFR does not require any particular fair housing planning process, so long as grantees can meaningfully certify that they are meeting the Fair Housing Act's AFFH obligation. HUD will provide technical assistance and support for grantees that want help with fair housing planning to support their certifications.

Consistent with their statutory obligation under the Fair Housing Act, the IFR requires HUD grantees to certify that they will affirmatively further fair housing, which is defined as taking meaningful actions to address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

HUD grantees may engage in fair housing planning to support their AFFH certifications, but the AFFH IFR does not require any specific form of planning or the submission of fair housing plans to HUD.

On February 9, 2023, HUD published in the Federal Register a <u>Notice of Proposed Rulemaking entitled</u> <u>"Affirmatively Furthering Fair Housing"</u>. The proposed rule, which builds on and refines HUD's 2015 rule, would faithfully implement the Fair Housing Act's statutory mandate that HUD ensure that recipients of its funding affirmatively further fair housing (AFFH). The AFFH mandate requires the agency and its program participants to proactively take meaningful actions to overcome patterns of segregation, promote fair housing choice, eliminate disparities in opportunities, and foster inclusive communities free from discrimination.

Specifically, the proposed rule would require program participants to identify fair housing issues facing their communities, using both data provided by HUD and local knowledge, and then commit to taking responsive actions. Fair housing outcomes would be locally driven based on the fair housing issues presented by local circumstances. This proposed rule does not dictate the particular steps a program participant must take to overcome a fair housing issue. Rather, the proposed rule is intended to empower and require program participants to meaningfully engage with their communities. This engagement would allow program participants to understand their local issues and develop the goals needed to achieve integrated living patterns, overcome historic and existing patterns of segregation, reduce racial and ethnic concentrations of poverty, increase access to homeownership, and ensure realistic and truly equal access to opportunity and community assets.

Currently under the AFFH IFR, the City of Lawrence has chosen to update the 2018 Assessment of Fair Housing that was accepted by HUD on December 11, 2017. Where available, updates have been made to the demographics summary using the American Community Survey (ASC) 2021 5-Year Estimates. HUD has also periodically provided additions, revisions, and corrections to the AFFH Data and Mapping Tool (AFFH-T) used in the Fair Housing Analysis section. The most recent HUD revisions and corrections, released on July 10, 2020, are being used in this update. The City of Lawrence has also reviewed and updated the goals established in the 2018 AFH.

Fair Housing Analysis

A. Demographic Summary

1. Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990)

Racial/Ethnic Populations

Table 1 - HUD AFFH Table 1

HUD Table 1 - Demographics	(Lawrence, F	(S) Jurisdiction
Race/Ethnicity	#	%
White, Non-Hispanic	70,694	74.62%
Black, Non-Hispanic	4,492	4.74%
Hispanic	6,502	6.86%
Asian or Pacific Islander, Non-Hispanic	5,842	6.17%
Native American, Non-Hispanic	1,703	1.80%
Two or More Races, Non-Hispanic	5,126	5.41%
Other, Non-Hispanic	386	0.41%
TOTAL	94,745	

(Sources: American Community Survey (ACS), 2021 5-Year Estimates); All % represent a share of the total population within the jurisdiction or region

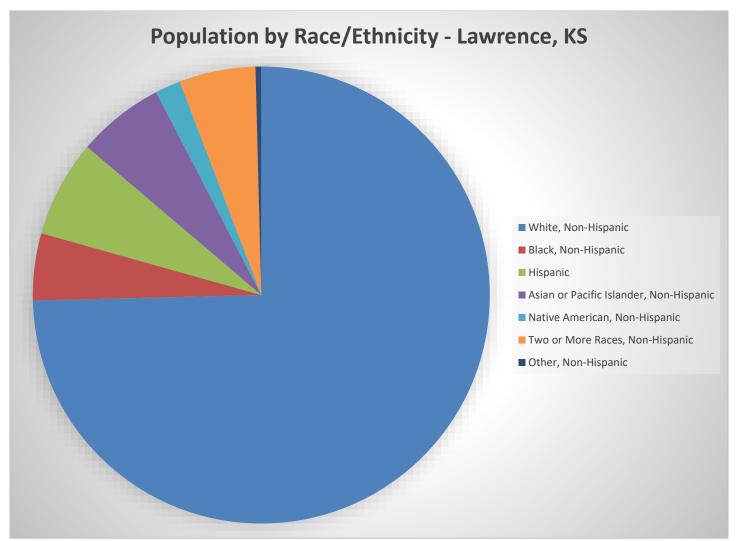


Figure 1 - Population by Race/Ethnicity - Lawrence, KS

Table 2 - HUD AFFH Table 1

HUD Table 1 - Demographics	(Lawrence, KS) Region				
Race/Ethnicity	#	%			
White, Non-Hispanic	91,871	77.40%			
Black, Non-Hispanic	4,629	3.90%			
Hispanic	7,732	6.51%			
Asian or Pacific Islander, Non-Hispanic	5,990	5.05%			
Native American, Non-Hispanic	1,877	1.58%			
Two or More Races, Non-Hispanic	5,959	5.02%			
Other, Non-Hispanic	632	0.53%			
TOTAL	118,690				

(Sources: ACS, 2021 5-Year Estimates); All % represent a share of the total population within the jurisdiction or region

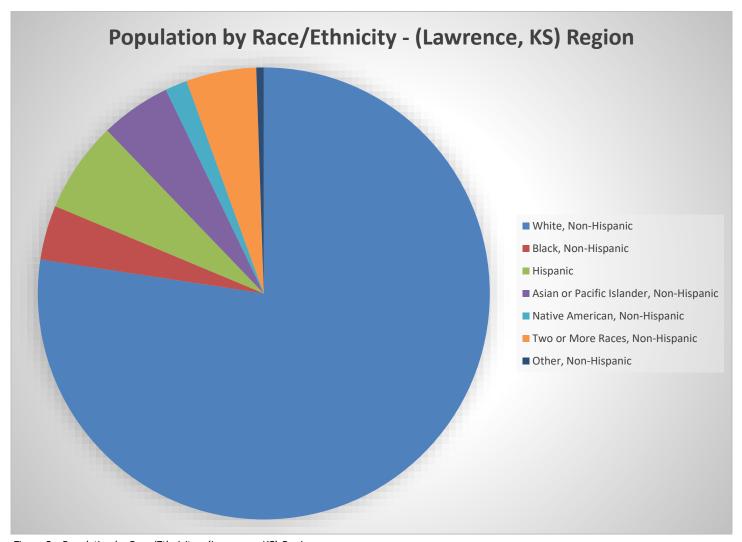


Figure 2 - Population by Race/Ethnicity - (Lawrence, KS) Region

Table 1 provides demographics by race/ethnicity in Lawrence, with Figure 1 providing a graphical representation of those demographics. Table 2 provides demographics by race/ethnicity in the region, with Figure 2 providing a graphical representation of those demographics.

In Lawrence, the White, Non-Hispanic population is the majority at 74.62 percent, which is lower than the regional White, Non-Hispanic population of 77.40 percent. The Black, Non-Hispanic population in Lawrence is 4.74 percent, which is higher than the regional of 3.90 percent. The Hispanic population is 6.86 percent

in Lawrence, slightly higher than the regional of 6.51 percent. Asian or Pacific Islander, Non-Hispanic in Lawrence is 6.17 percent, higher than the regional of 5.05 percent. The Native American, Non-Hispanic population is 1.80 percent, slightly higher than the regional of 1.58 percent. The Two or More Races, Non-Hispanic in Lawrence is 5.41 percent, slightly higher than the regional of 5.02 percent. Individuals who identify as Other, Non-Hispanic are 0.41 percent in Lawrence, lower than the regional of 0.53 percent.

Racial/Ethnic Demographic Trends

Table 3 - HUD AFFH Table 2

HUD Table 2 – Demographic Trends		(Lawrence, KS) Jurisdiction									
Tiob Table 2 – Demographic Trends	1990 Trend		2000 Trend		2010 Trend		Current				
Race/Ethnicity	#	%	#	%	#	%	#	%			
White, Non-Hispanic	55,185	85.56%	66,171	82.27%	69,366	79.02%	70,694	74.62%			
Black, Non-Hispanic	3,085	4.78%	4,747	5.90%	5,228	5.96%	4,492	4.74%			
Hispanic	1,888	2.93%	2,902	3.61%	4,954	5.64%	6,502	6.86%			
Asian or Pacific Islander, Non-Hispanic	2,432	3.77%	3,544	4.41%	4,782	5.45%	5,842	6.17%			
Native American, Non-Hispanic	1,783	2.76%	2,775	3.45%	3,278	3.73%	1,703	1.80%			

(Sources: Brown Longitudinal Tract Database (LTDB) based on decennial census data, 2010, 2000 & 1990; ACS, 2021 5-Year Estimates); All % represent a share of the total population within the jurisdiction or region

Table 3 provides demographic trends by race/ethnicity in Lawrence from 1990, to current.

Since 1990, there have been several demographic shifts in Lawrence. The White, Non-Hispanic population decreased from 85.56 percent to 74.62 percent. The Black, Non-Hispanic population decreased slightly from 4.78 percent to 4.74 percent. The Hispanic population increased the largest from 2.93 percent to 6.86 percent. The Asian or Pacific Islander, Non-Hispanic population increased from 3.77 percent to 6.17 percent. The Native American, Non-Hispanic population decreased from 2.76 percent to 1.80 percent.

Table 4 - HUD AFFH Table 2

HUD Table 2 – Demographic Trends		(Lawrence, KS) Region									
Tiob Table 2 – Demographic Trends	1990 Trend		2000 Trend		2010 Trend		Current				
Race/Ethnicity	#	%	#	%	#	%	#	%			
White, Non-Hispanic	71,735	87.68%	84,540	84.57%	90,532	81.69%	91,871	77.40%			
Black, Non-Hispanic	3,265	3.99%	4,995	5.00%	5,682	5.13%	4,629	3.90%			
Hispanic	2,127	2.60%	3,265	3.27%	5,651	5.10%	7,732	6.51%			
Asian or Pacific Islander, Non-Hispanic	2,531	3.09%	3,695	3.70%	5,052	4.56%	5,990	5.05%			
Native American, Non-Hispanic	2,008	2.45%	3,154	3.16%	3,718	3.35%	1,877	1.58%			

(Sources: Brown Longitudinal Tract Database (LTDB) based on decennial census data, 2010, 2000 & 1990; ACS, 2021 5-Year Estimates); All % represent a share of the total population within the jurisdiction or region

Table 4 provides demographic trends by race/ethnicity in the region from 1990 to current.

The region as a whole has seen a similar demographic shift as in Lawrence. The White, Non-Hispanic population has grown from 71,735 to 91,871, but due to the overall population growth in the region, the percentage has decreased from 87.68 percent to 77.40 percent. The Black, Non-Hispanic population in the region stayed relatively stable from 3.99 percent to 3.90 percent. As in Lawrence, the region's Hispanic population increased the greatest, from 2.60 percent to 6.51 percent. The Asian or Pacific Islander, Non-Hispanic population increased from 3.09 percent to 5.05 percent in the region. Regionally, the Native American, Non-Hispanic population also decreased from 2.45 percent to 1.58 percent.

National Origin Populations

Table 5 - HUD AFFH Table 1

HUD Table 1 -						
Demographics	(Lawrence, KS) Juris	diction	(Lawrence, KS) Region			
National Origin		#	%		#	%
#1 country of origin	China excl. Taiwan	2,245	2.37%	China excl. Taiwan	2,277	1.92%
#2 country of origin	Mexico	755	0.80%	Mexico	776	0.65%
#3 country of origin	India	732	0.77%	India	771	0.65%
#4 country of origin	Senegal	346	0.37%	Senegal	346	0.29%
#5 country of origin	Philippines	285	0.30%	Philippines	311	0.26%
#6 country of origin	Vietnam	253	0.27%	Canada	258	0.22%
#7 country of origin	Korea	244	0.26%	Korea	246	0.21%
#8 country of origin	Canada	216	0.23%	Laos	196	0.17%
#9 country of origin	Laos	196	0.21%	Ethiopia	150	0.13%
#10 country of origin	Japan	196	0.21%	Iran	129	0.11%

(Sources: ACS, 2021 5-Year Estimates); All % represent a share of the total population within the jurisdiction or region

Table 5 provides demographics by the top ten countries of national origin for both Lawrence and the region.

China, excluding Taiwan, is the most common national origin in both Lawrence at 2.37 percent and the region at 1.92 percent. Mexico is the second most common national origin in Lawrence with 0.80 percent, as well as the region with 0.65 percent. India is the third most common national origin in Lawrence with 0.77 percent, as well as the region with 0.65 percent. The remaining top seven countries of origin in both Lawrence and the region are less than 0.50 percent.

Foreign-Born Demographic Trends

Table 6 - HUD AFFH Table 2

HUD Table 2 –	(Lawrence, KS) Jurisdiction								
Demographic Trends	1990 Trend		2000 Trend		2010 Trend		Current		
Demographic Hends	#	%	#	%	#	%	#	%	
Foreign-Born	3,998	6.20%	4,934	6.13%	6,414	7.31%	7,523	7.94%	

(Sources: Decennial Census, 2000, 1990; ACS, 2016-2020); All % represent a share of the total population within the jurisdiction or region

Table 7 - HUD AFFH Table 2

HUD Table 2 — Demographic Trends	(Lawrence, KS) Region									
	1990 Trend		2000 Trend		2010	Trend	Current			
Demographic Henus	#	%	#	%	#	%	#	%		
Foreign-Born	4,128	5.05%	5,168	5.17%	6,759	6.10%	7,814	6.58%		

(Sources: Decennial Census, 2000, 1990; ACS, 2016-2020); All % represent a share of the total population within the jurisdiction or region

Table 6 provides demographic trends by foreign-born persons in Lawrence from 1990 to current. Table 7 provides demographics by foreign-born persons in the region from 1990 to current.

The Foreign-Born population has steadily increased since 1990 in both Lawrence and the region. In Lawrence, the Foreign-Born population grew from 3,998 (6.2 percent) in 1990 to 7,523 (7.94 percent). The region saw a similar growth from 4,128 (5.05 percent) in 1990 to 7,814 (6.58 percent).

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."¹

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.

Individuals who self-identified as "Speak English Less Than Well" were utilized in this analysis.

Table 8 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 indicates, only 0.8% of persons residing within the City of Lawrence are identified as being LEP.

Table 8 - LEP

Jurisdiction	Total Population: 5 Years & Over	Speak English Less Than Well	%
Kansas	2,723,766	59,645	2.2%
Region (Douglas County)	115,289	811	0.7%
Lawrence	92,651	778	0.8%

(Sources: ACS, 2016-2020 (Table B16005). ACS data is an estimate so these numbers have a certain level of margin of error associated with them.)

Table 9, also derived from the 2016-2020 American Community Survey 5-Year Estimates, shows the number of LEP persons living in Lawrence and the three most common language families spoken by LEP persons living in Lawrence (five years of age or older). Table 9 shows the following:

- 0.29% of the entire Lawrence population are Spanish speakers who "Speak English Less Than Well";
- 0.46% 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";
- 0.08% 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
- 0.005% of the entire Lawrence population are speakers of languages other than those otherwise identified who "**Speak English Less Than Well**".

Table 9 - LEP

		Speak English Less Than Well									
Jurisdiction	Total Population: 5 Years & Over	Speak Spanish	% Spanish	Speak Other Indo- European Languages	% Other Indo- Euro	Speak Asian & Pacific Island Languages	% Asian & Pacific Island	Speak Other Languages	% Other		
Kansas	2,723,766	43,324	1.6%	3,009	0.11%	10,865	0.40%	2,447	0.09%		
Douglas County	115,289	270	0.23%	74	0.06%	462	0.40%	5	0.004%		
Lawrence	92,651	270	0.29%	74	0.08%	429	0.46%	5	0.005%		

(Sources: ACS, 2016-2020 (Table B16005). ACS data is an estimate so these numbers have a certain level of margin of error associated with them.)

¹ According to the 2016-2020 American Community Survey, more than 5 million households (4.30 percent) in the United States reported that they were LEP.

The HUD provided data below utilizes individuals who self-identified as "**Speak English Less than Very Well**".

Limited English Proficiency Demographic Trends

Table 10 - HUD AFFH Table 2

HUD Table 2 –	(Lawrence, KS) Jurisdiction – English Less than Very Well									
Demographic Trends	1990 Trend		2000 Trend		2010	Trend	Current			
Demographic Hends	#	%	#	%	#	%	#	%		
Limited English Proficiency	2,277	3.53%	2,493	3.10%	3,322	3.78%	3,460	3.94%		

(Sources: Decennial Census, 2010, 2000, 1990; ACS, 2015 5-Year Estimates); All % represent a share of the total population within the jurisdiction or region

Table 10 provides demographic trends by LEP persons in Lawrence from 1990 to current.

Table 11 - HUD AFFH Table 2

HUD Table 2 –	(Lawrence, KS) Region – English Less than Very Well								
Demographic Trends	1990 Trend		2000 Trend		2010 Trend		Current		
Demographic Henus	#	%	#	%	#	%	#	%	
Limited English Proficiency	2,410	2.95%	2,606	2.61%	3,474	3.13%	3,676	3.32%	

(Sources: Decennial Census, 2010, 2000, 1990; ACS, 2015 5-Year Estimates); All % represent a share of the total population within the jurisdiction or region

Table 11 provides demographic trends by LEP persons in the region from 1990 to current.

Since 1990, the percentage of individuals who spoke "**English Less Than Very Well**" has increased in Lawrence from 3.53 percent to 3.94 percent. In the region, the percentage of individuals who spoke "**English Less Than Very Well**" has similarly increased from 2.95 percent in 1990 to 3.32 percent.

Individuals with Disabilities by Disability Type

Table 12 - HUD AFFH Table 13

HUD Table 13 – Disability by Type	(Lawrence, KS	3) Jurisdiction	(Lawrence, KS) Region		
1100 Table 13 – Disability by Type	#	%	#	%	
Cognitive Difficulty	5,283	5.58%	6,436	5.42%	
Ambulatory Difficulty	3,713	3.92%	4,888	4.12%	
Independent Living Difficulty	3,132	3.31%	4,139	3.49%	
Hearing Difficulty	2,147	2.27%	3,179	2.68%	
Vision Difficulty	1,499	1.58%	2,031	1.71%	
Self-Care Difficulty	1,325	1.40%	1,986	1.67%	

(Source: ACS, 2021 5-Year Estimates); All % represent a share of the total population within the jurisdiction or region

Table 12 provides demographics by individuals with disabilities by disability type for both Lawrence and the region.

Lawrence and the region have similar populations of individuals with disabilities by disability type. The most common disability is Cognitive Difficulty, which affects 5.58 percent of the Lawrence population and 5.42 percent in the region. The second most common disability is Ambulatory Difficulty, which affects 3.92 percent of the Lawrence population and 4.12 percent in the region.

Individuals with Disabilities by Age Group

Table 13 - HUD AFFH Table 14

HUD Table 14 - Disability by Age	(Lawrence, KS	S) Jurisdiction	(Lawrence, KS) Region		
Group	#	%	#	%	
Age 5-17 with Disabilities	881	0.93%	1,158	0.98%	
Age 18-64 with Disabilities	6,074	6.41%	7,494	6.31%	
Age 65+ with Disabilities	2,978	3.14%	4,162	3.51%	

(Source: ACS, 2021 5-Year Estimates); All % represent a share of the total population within the jurisdiction or region

Table 13 provides demographics by individuals with disabilities by age group for both Lawrence and the region.

Lawrence and the region have similar populations of individuals with disabilities by age group. In Lawrence, 0.93 percent of individuals aged 5-17 have a disability compared to 0.98 percent in the region. In Lawrence, 6.41 percent of individuals aged 18-64 have a disability compared to 6.31 percent in the region. In Lawrence, 3.14 percent of individuals aged 65+ have a disability compared to 3.51 percent in the region.

Families with Children

Table 14 - HUD AFFH Table 1

HUD Table 1 - Demographics	(Lawrence, KS	3) Jurisdiction	(Lawrence, KS) Region		
Family Type	#	%	#	%	
Families with children	8,265	42.96%	10,940	42.06%	

(Sources: ACS, 2021 5-Year Estimates); All % represent a share of total families in the jurisdiction or region

Table 14 provides demographics by families with children for both Lawrence and the region.

In Lawrence 8,265 families (42.96 percent) have children, while similarly 10,940 families (42.06 percent) in the region have children.

Families with Children Demographic Trends

Table 15 - HUD AFFH Table 2

HUD Table 2 –	(Lawrence, KS) Jurisdiction							
Demographic Trends	1990 Trend		90 Trend 2000 Trend		2010 Trend		Current	
Demographic Trends	#	%	#	%	#	%	#	%
Families with children	6,406	50.77%	7,195	50.11%	7,961	46.85%	8,265	42.96%

(Sources: Decennial Census, 1990, 2000, 2010; ACS 2021 5-Year Estimates); All % represent a share of total families in the jurisdiction or region

Table 15 provides demographic trends by families with children in Lawrence from 1990 to current.

Table 16 - HUD AFFH Table 2

HUD Table 2 –	(Lawrence, KS) Region								
Demographic Trends	1990	Trend	2000 Trend		2010 Trend		Current		
Demographic Trends	#	%	#	%	#	%	#	%	
Families with children	8,779	50.75%	9,198	50.38%	10,754	46.15%	10,940	42.06%	

(Sources: Decennial Census, 1990, 2000, 2010; ACS 2021 5-Year Estimates); All % represent a share of total families in the jurisdiction or region

Table 16 provides demographic trends by families with children in the region from 1990 to current.

Since 1990, there has been a decrease in the percentage of families with children in both Lawrence and the region. In Lawrence the percentage has dropped from 50.77 percent in 1990 to 42.96 percent, while in the region the percentage has dropped from 50.75 percent in 1990 to 42.06 percent.

Sex Demographics

Table 17 - HUD AFFH Table 1

HUD Table 1 - Demographics	(Lawrence, KS	3) Jurisdiction	(Lawrence, KS) Region		
Sex	#	%	#	%	
Male	46,896	49.50%	58,929	49.65%	
Female	47,849	50.20%	59,761	50.35%	

(Sources: ACS 2021 5-Year Estimates); All % represent a share of the total population within the jurisdiction or region

Table 17 provides demographics by sex for both Lawrence and the region.

Lawrence has a slightly higher percentage of females (50.20 percent) over males. This is similar to the region, which also has a slightly higher percentage of females (50.35 percent) over males.

Sex Demographic Trends

Table 18 - HUD AFFH Table 2

HUD Table 2 -	(Lawrence, KS) Jurisdiction							
Demographics	1990 Trend		1990 Trend 2000 Trend		2010 Trend		Current	
Demographics	#	%	#	%	#	%	#	%
Male	31,792	49.29%	40,008	49.74%	44,080	50.22%	46,896	49.50%
Female	32,705	50.71%	40,434	50.26%	43,700	49.78%	47,849	50.20%

(Sources: ACS 2021 5-Year Estimates; Brown Longitudinal Tract Database (LTDB) based on decennial census data, 1990, 2000, 2010); All % represent a share of the total population within the jurisdiction or region

Table 19 - HUD AFFH Table 2

HUD Table 2 -	(Lawrence, KS) Region							
Demographics	1990 Trend		1990 Trend 2000 Trend		2010 Trend		Current	
Demographics	#	%	#	%	#	%	#	%
Male	40,502	49.51%	49,666	49.68%	55,573	50.14%	58,929	49.65%
Female	41,296	50.49%	50,296	50.32%	55,253	49.86%	59,761	50.35%

(Sources: ACS 2021 5-Year Estimates; Brown Longitudinal Tract Database (LTDB) based on decennial census data, 1990, 2000, 2010); All % represent a share of the total population within the jurisdiction or region

Table 18 provides demographic trends by sex in Lawrence from 1990 to current. Table 19 provides demographic trends by sex in the region from 1990 to current.

Since 1990, the percentage of males and females in Lawrence and the region has stayed relatively stable. The male population in Lawrence slightly increased from 49.29 percent in 1990 to 49.50 percent. The female population in Lawrence slightly decreased from 50.71 percent in 1990 to 50.20 percent. The male population in the region slightly increased from 49.51 percent in 1990 to 49.65 percent. The female population in the region slightly decreased from 50.49 percent in 1990 to 50.35 percent.

Age Demographics

Table 20 - HUD AFFH Table 1

HUD Table 1 - Demographics	(Lawrence, KS	3) Jurisdiction	(Lawrence, KS) Region		
Age	#	%	#	%	
Under 18	16,031	16.92%	21,602	18.20%	
18-64	67,743	71.50%	82,278	69.32%	
65+	10,971	11.58%	14,810	12.48%	

(Sources: ACS 2021 5-Year Estimates); All % represent a share of the total population within the jurisdiction or region

Table 20 provides demographics by age for both Lawrence and the region.

Lawrence has a lower percentage of individuals under 18 (16.92 percent) in comparison to the region (18.20 percent). Lawrence has a higher percentage of individuals 18-64 (71.50 percent) compared to the region (69.32 percent). Lawrence has a lower percentage of individuals 65+ (11.58 percent) when compared to the region (12.48 percent).

Age Demographic Trends

Table 21 - HUD AFFH Table 2

HUD Table 2 –	(Lawrence, KS) Jurisdiction							
Demographic Trends	1990 Trend		1990 Trend 2000 Trend		2010 Trend		Current	
Demographic Trends	#	%	#	%	#	%	#	%
Under 18	12,105	18.77%	15,975	19.86%	15,372	17.51%	16,031	16.92%
18-64	47,588	73.78%	58,628	72.88%	65,329	74.42%	67,743	71.50%
65+	4,804	7.45%	5,839	7.26%	7,079	8.06%	10,971	11.58%

(Sources: Decennial Census, 1990, 2000, 2010; ACS 2021 5-Year Estimates); All % represent a share of the total population within the jurisdiction or region

Table 22 - HUD AFFH Table 2

HUD Table 2 –		(Lawrence, KS) Region						
Demographic Trends	1990 Trend		L990 Trend 2000 Trend		2010 Trend		Current	
Demographic Hends	#	%	#	%	#	%	#	%
Under 18	16,692	20.41%	21,527	21.54%	21,131	19.07%	21,602	18.20%
18-64	58,425	71.43%	70,478	70.50%	79,828	72.03%	82,278	69.32%
65+	6,681	8.17%	7,957	7.96%	9,867	8.90%	14,810	12.48%

(Sources: Decennial Census, 1990, 2000, 2010; ACS 2021 5-Year Estimates); All % represent a share of the total population within the jurisdiction or region

Table 21 provides demographic trends by age in Lawrence from 1990 to current. Table 22 provides demographic trends by age in the region from 1990 to current.

Since 1990, changes in age have occurred in both Lawrence and the region. In Lawrence, individuals under 18 have decreased from 18.77 percent in 1990 to 16.92 percent. Individuals 18-64 have decreased from 73.78 percent in 1990 to 71.50 percent. Individuals 65+ have increased from 7.45 percent in 1990 to 11.58 percent.

In the region, individuals under 18 have decreased from 20.41 percent in 1990 to 18.20 percent. Individuals 18-64 have decreased from 71.43 percent in 1990 to 69.32 percent. Individuals 65+ have also increased from 8.17 percent in 1990 to 12.48 percent.

B. General Issues

- i. Segregation/Integration
- 1. Analysis
- a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.

Table 23 - HUD AFFH Table 3

HUD Table 3 - Racial/Ethnic	(Lawrence, KS) Jurisdiction	(Lawrence, KS) Region		
Dissimilarity Index	Current	Current		
Non-White/White	20.98	25.38		
Black/White	21.87	28.14		
Hispanic/White	16.94	20.45		
Asian or Pacific Islander/White	25.80	32.83		

(Source: Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) based on decennial census data, 2010, 2000 & 1990. Decennial Census data are Block-group level, and LTDB data are census tract level.)

The dissimilarity index (or the index of dissimilarity) is a commonly used measure of community-level segregation. The dissimilarity index represents the extent to which the distribution of any two groups (frequently racial or ethnic groups) differs across census tracts or block groups. It is calculated as:

Equation 1 - Dissimilarity Index

$$D_j^{WB} = 100 * \frac{1}{2} \sum_{i=1}^{N} \left| \frac{W_i}{W_j} - \frac{B_i}{B_j} \right|$$

Where i indexes census block groups or tracts, j is the jth jurisdiction, W is group one and B is group two, and N is the number of block groups or tracts i in jurisdiction j.

The Racial/Ethnic Dissimilarity Index (DI) provided by HUD measures the degree to which two groups are evenly distributed across a geographic area and is commonly used for assessing residential segregation between two groups. Values range from 0 to 100, where higher numbers indicate a higher degree of segregation between the two groups measured. DI values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation.

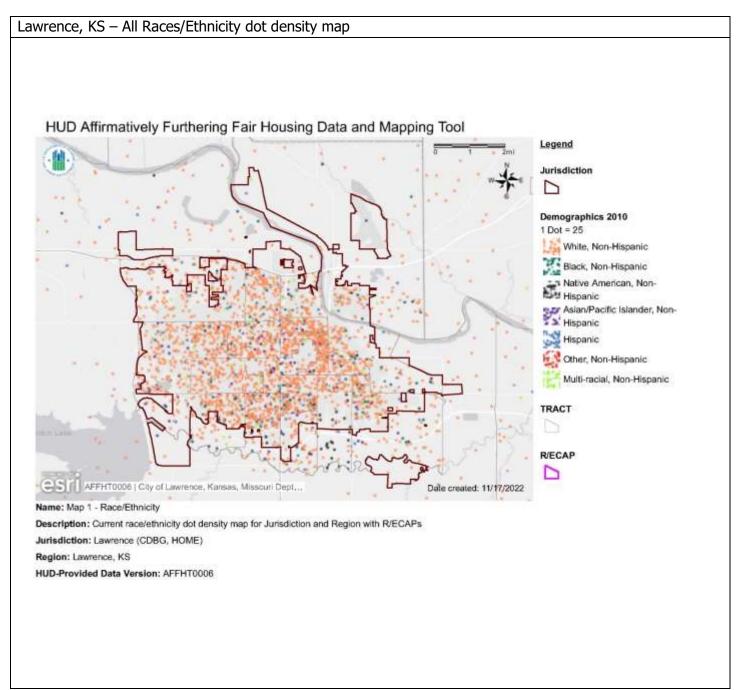
Table 23 provides the DI numbers for both Lawrence and the region, which generally indicate low segregation for all racial/ethnic groups. The highest levels of segregation for both Lawrence and the region are between Asian or Pacific Islander and White populations, but the DI values are still in the low segregation range.

The term segregation, for purposes of the AFFH rule, means a condition within the program participant's geographic area of analysis, as guided by this Assessment Tool, in which there is a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a type of disability in a particular geographic area when compared to a broader geographic area. Conversely, integration means, for purposes of the AFFH Rule, a condition within the program participant's geographic area of analysis, as guided by this Assessment Tool, in which there is not a high concentration of a

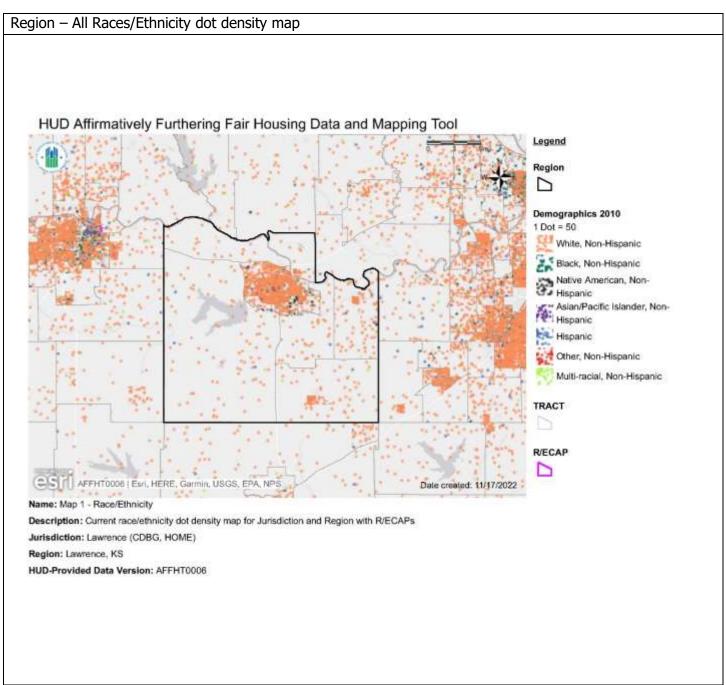
particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability when compared to a broader geographic area.

b. Identify areas in the jurisdiction and region with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

Segregation/Integration by Race/Ethnicity



Map 1 - HUD AFFH Map 1 - Current race/ethnicity dot density map for jurisdiction



Map 2 - HUD AFFH Map 1 - Current race/ethnicity dot density map for region

Map 1 displays a race/ethnicity dot density map for Lawrence showing all races/ethnicity together. Map 2 displays a race/ethnicity dot density map for the region showing all races/ethnicity together.

The Racial/Ethnic Dissimilarity Index (DI) between Black/White populations in Lawrence (21.87) and the region (28.14) both generally indicate low segregation. Higher areas of integration occur in the Central area around The University of Kansas. Higher areas of segregation occur in the Southeast area around Haskell Indian Nations University. In the region, higher areas of integration occur in the East and Southeast areas, corresponding to the outlying smaller communities of Eudora and Baldwin City. Higher areas of segregation occur in the Southwest area of the region, corresponding to the largely agricultural and rural homesteads in the area.

The Racial/Ethnic Dissimilarity Index (DI) between Asian or Pacific Islander/White populations in Lawrence (25.80) and the region (32.83) both generally indicate low segregation. Higher areas of integration occur around the Central area around The University of Kansas. Higher areas of segregation occur in the Southeast area around Haskell Indian Nations University and in Northeast Lawrence. In the region, higher areas of integration occur in the East and Southeast areas, corresponding to the outlying smaller communities of Eudora and Baldwin City. Higher areas of segregation occur in the Southwest area of the region, corresponding to the largely agricultural and rural homesteads in the area.

The Racial/Ethnic Dissimilarity Index (DI) between Hispanic/White, Non-Hispanic populations in Lawrence (16.94) and the region (20.45) both generally indicate low segregation. Higher areas of integration occur in the Central area around The University of Kansas. Higher areas of segregation occur in the Southeast area around Haskell Indian Nations University, and in extreme Northwest Lawrence. In the region, higher areas of integration occur in the East and Southeast areas, corresponding to the outlying smaller communities of Eudora and Baldwin City. Higher areas of segregation occur in the Southwest area of the region, corresponding to the largely agricultural and rural homesteads in the area.

While no Racial/Ethnic Dissimilarity Index (DI) between Native American/White populations is provided by HUD, there is a higher area of integration in the Southeast area of the jurisdiction around Haskell Indian Nations University, and higher areas of segregation in other areas of Lawrence and the region. Haskell Indian Nations University is the premiere tribal university in the United States, offering quality education to Native American students. Haskell's student population averages about 1000 per semester and all students are members of federally recognized tribes. Haskell's faculty and staff is predominantly native, and the historic campus is centrally located in Lawrence, KS, offering Associate and Bachelor's degrees.

Segregation/Integration by National Origin

In Lawrence, higher areas of integration of foreign-born individuals occur in the Central area around The University of Kansas and in areas that contain more rentals than owner-occupied units. Higher areas of segregation occur in the Southeast area around Haskell Indian Nations University, and in extreme Northwest and Northeast Lawrence. In the region, there are higher areas of segregation of foreign-born individuals by national origin, corresponding to the largely agricultural and rural homesteads in the area.

Segregation/Integration by Limited English Proficiency (LEP)

In Lawrence, higher concentrations of LEP individuals live in the Central area around The University of Kansas and in areas that contain more rentals than owner-occupied units. Higher areas of segregation occur in the Southeast area around Haskell Indian Nations University, and in extreme Northwest and Northeast Lawrence.

In the region, there are higher areas of segregation of LEP individuals, corresponding to the largely agricultural and rural homesteads in the area.

c. Explain how these segregation levels and patterns in the jurisdiction and region have changed over time (since 1990).

Table 244 - HUD AFFH Table 3

HUD Table 3 –	(Lawrence, KS) Jurisdiction				(Lawrence, KS) Region			
Racial/Ethnic Dissimilarity	1990	2000	2010		1990	2000	2010	
Trends	Trend	Trend	Trend	Current	Trend	Trend	Trend	Current
Non-White/White	19.54	18.34	17.23	20.98	25.36	22.56	22.64	25.38
Black/White	20.68	20.09	18.61	21.87	29.26	26.57	24.97	28.14
Hispanic/White	10.40	15.30	14.82	16.94	16.71	18.01	18.67	20.45
Asian or Pacific Islander/White	32.29	26.03	20.13	25.80	37.24	31.76	27.57	32.83

(Source: Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) based on decennial census data, 2010, 2000 & 1990. Decennial Census data are Block-group level, and LTDB data are census tract level.)

The Racial/Ethnic Dissimilarity Index (DI) provided by HUD measures the degree to which two groups are evenly distributed across a geographic area and is commonly used for assessing residential segregation between two groups. Values range from 0 to 100, where higher numbers indicate a higher degree of segregation between the two groups measured. DI values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation. The DI numbers for both Lawrence and the Region generally indicate low segregation for all racial/ethnic groups.

Table 24 provides the Racial/Ethnic Dissimilarity Index (DI) trends for both Lawrence and the region from 1990 to current, which shows a slight increase from 19.54 to 20.98 in Non-White/White in the jurisdiction. The same index for the region also decreased for a period of time but has since returned to a similar value from 1990, 25.36 to 25.38.

Over time, the Non-White/White and Black/White DI values have remained relatively steady in Lawrence, while the Hispanic/White DI increased from 10.40 in 1990 to 16.94 currently, and Asian or Pacific Islander/White decreased from 32.29 in 1990 to 25.80 currently. All DI values are still between 0 and 39, which generally indicates low segregation.

d. Consider and describe the location of owner and renter occupied housing in the jurisdiction and region in determining whether such housing is located in segregated or integrated areas, and describe trends over time.

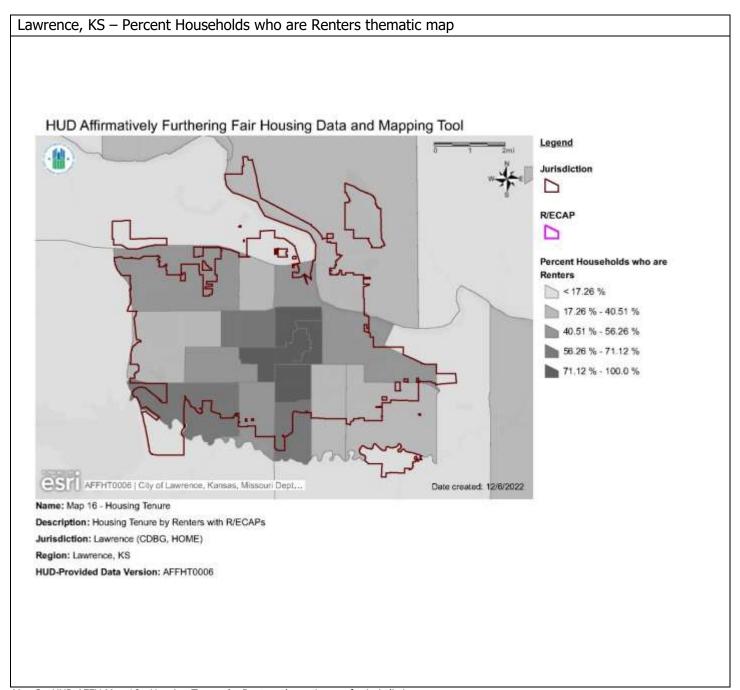
Table 255 - HUD AFFH Table 16

HUD Table 16 – Homeownership and	(Lawrence, KS) Jurisdiction				(Lawrence, KS) Region			
Rental Rates by Race/Ethnicity	Homeowners		Renters		Homeowners		Renters	
	#	%	#	%	#	%	#	%
White, Non-Hispanic	14,515	89.90%	14,660	75.80%	20,595	90.71%	16,695	77.62%
Black, Non-Hispanic	340	2.11%	1,210	6.26%	400	1.76%	1,225	5.70%
Hispanic	445	2.76%	1,135	5.87%	535	2.36%	1,175	5.46%
Asian or Pacific Islander, Non-Hispanic	435	2.69%	1,205	6.23%	505	2.22%	1,205	5.60%
Native American, Non-Hispanic	190	1.18%	420	2.17%	285	1.26%	420	1.95%
Other, Non-Hispanic	220	1.36%	710	3.67%	390	1.72%	785	3.65%
Total Household Units	16,145	-	19,340	-	22,705	-	21,510	-

(Source: HUD Comprehensive Housing Affordability Strategy (CHAS), 2011-2015); Data presented are numbers of households, not individuals

Table 25 provides demographics for homeownership and rental rates by race/ethnicity for both Lawrence and the region.

Percent of Households who are Renters in the Jurisdiction

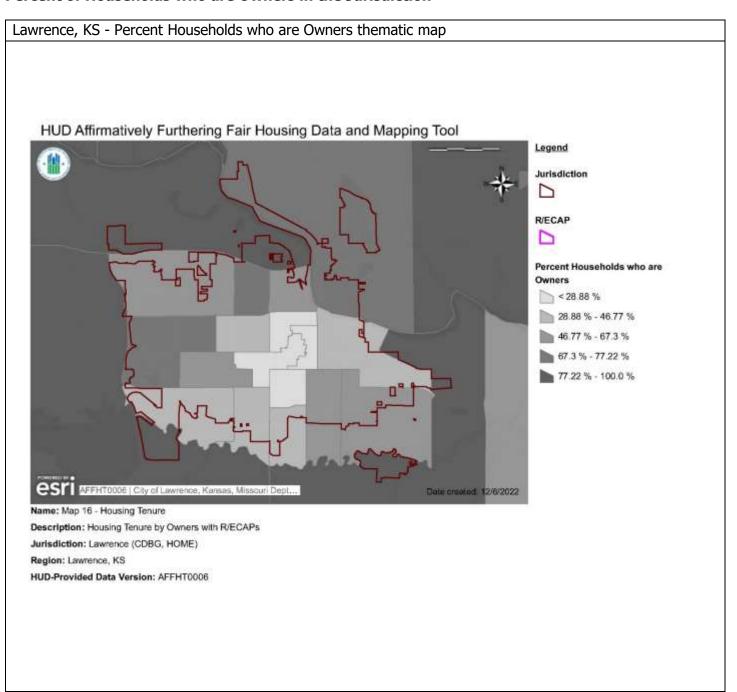


Map 3 - HUD AFFH Map 16 - Housing Tenure by Renters thematic map for jurisdiction

Map 3 displays a housing tenure by renters thematic map for Lawrence showing the percent of households who are renters.

In Lawrence, 54.50 percent of all households are renter-occupied. The larger concentrations of renter households occur in the Central area around The University of Kansas. The Racial/Ethnic Dissimilarity Index (DI) provided by HUD generally indicates low segregation in Lawrence, but higher areas of integration occur in this Central area. Over time, owner-occupied units have been converted to renter-occupied to accommodate the university student population.

Percent of Households who are Owners in the Jurisdiction

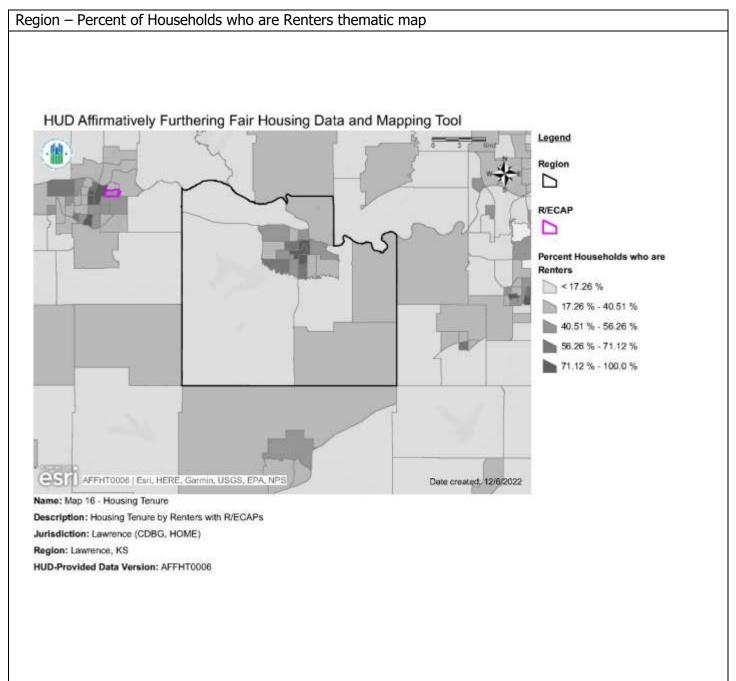


Map 4 - HUD AFFH Map 16 - Housing Tenure by Owners thematic map for jurisdiction

Map 4 displays a housing tenure by owners thematic map for Lawrence showing the percent of households who are owners.

In Lawrence, 45.50 percent of all households are owner occupied. The larger concentrations of owner-occupied units occur in the West, Southeast, Northwest, and Northeast areas of town. The Racial/Ethnic Dissimilarity Index (DI) provided by HUD generally indicates low segregation in Lawrence, but higher areas of integration occur in the Central area around The University of Kansas. Over time, additional owner-occupied units have been constructed in the Southeast and Northwest areas to accommodate those owners commuting to work in the Kansas City or Topeka area.

Percent of Households who are Renters in the Region

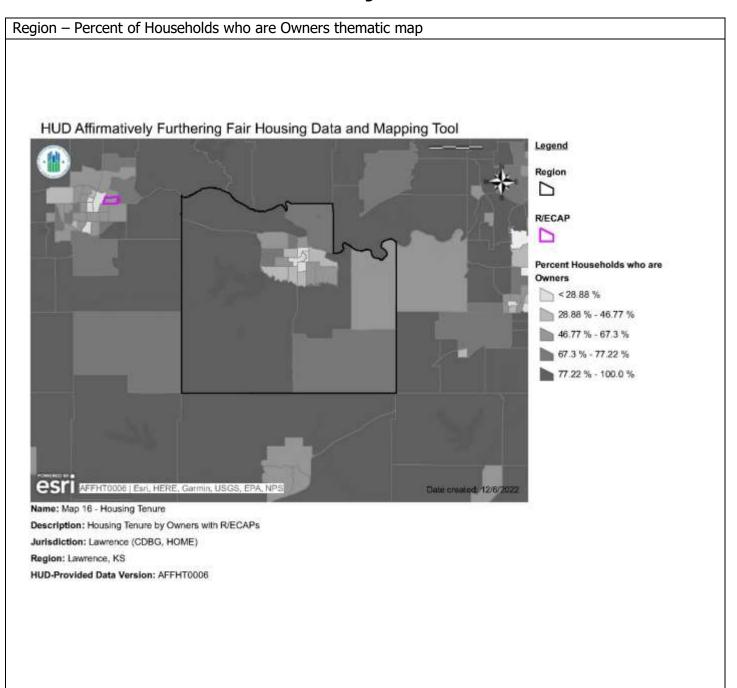


Map 5 - HUD AFFH Map 16 - Housing Tenure by Renters thematic map for region

Map 5 displays a housing tenure by renters thematic map for the region showing the percent of households who are renters.

In the region, 48.65 percent of all households are renter-occupied. This is less than the renter occupied percentage in the jurisdiction. The larger concentrations of renter households in the region occur in the East, North, and Southeast, corresponding with the smaller communities of Eudora, Lecompton, and Baldwin City. The Racial/Ethnic Dissimilarity Index (DI) provided by HUD generally indicates low segregation in the region. Over time, additional renter-occupied units have been added in the East and Southeast to accommodate the growing populations in the outlying smaller communities.

Percent of Households who are Owners in the Region

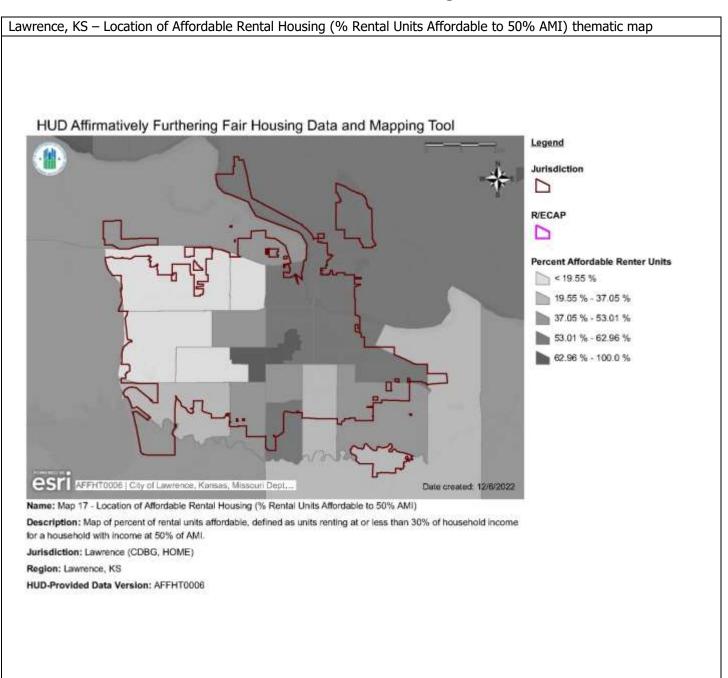


Map 6 - HUD AFFH Map 16 - Housing Tenure by Owners thematic map for region

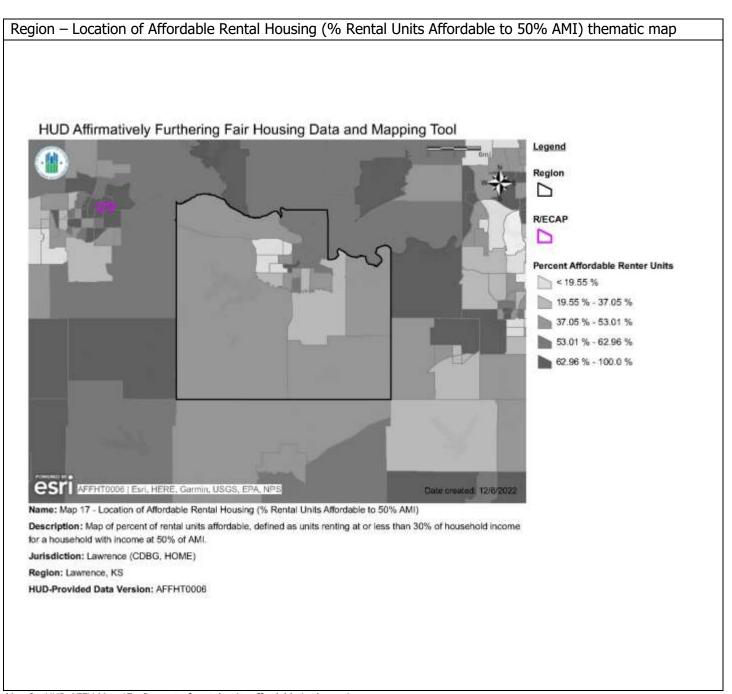
Map 6 displays a housing tenure by owners thematic map for the region showing the percent of households who are owners.

In the region, 51.35 percent of all households are owner-occupied. This is greater than the owner-occupied percentage in the jurisdiction. The larger concentrations of owner-occupied units occur in the West and Central areas of the region, which corresponds to the largely agricultural and rural homesteads in the area. The Racial/Ethnic Dissimilarity Index (DI) provided by HUD generally indicates low segregation in the region. Over time, the number of owner-occupied units has decreased in the East and Southeast, as agricultural homesteads are annexed and converted to renter-occupied units for the growing populations in the outlying smaller communities of Eudora and Baldwin City.

Percent of Affordable Renter Units in the Jurisdiction and Region



Map 7 - HUD AFFH Map 17 - Percent of rental units affordable in the jurisdiction



Map 8 - HUD AFFH Map 17 - Percent of rental units affordable in the region

Map 7 displays a location of affordable rental housing thematic map for Lawrence showing the percent of affordable renter units, defined as units renting at or less than 30 percent of household income for persons at 50 percent of area median income (AMI). Map 8 displays a location of affordable rental housing thematic map for the region showing the percent of affordable renter units, defined as units renting at or less than 30 percent of household income for persons at 50 percent of area median income (AMI).

In Lawrence, the highest concentration of affordable renter units occurs in the Central area around The University of Kansas. The Racial/Ethnic Dissimilarity Index (DI) provided by HUD generally indicates low segregation in Lawrence, but higher areas of integration occur in this Central area. The lowest concentration of affordable renter units occurs in the West and Northwest areas of the jurisdiction. The

region shows no high concentration areas of affordable renter-occupied units. The Racial/Ethnic Dissimilarity Index (DI) provided by HUD generally indicates low segregation in the region. The lowest concentrations of affordable renter-occupied units occur in the Central area of the region.

e. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future. Participants should focus on patterns that affect the jurisdiction and region rather than creating an inventory of local laws, policies, or practices.

The demographic trends in Lawrence do not appear to be leading to higher segregation in the future. The White/Non-White distribution has decreased 10.56 percent since 1990. Since 1990, the Black, Non-Hispanic population has increased 48.85 percent, the Hispanic population has increased 246.72 percent, the Asian or Pacific Islander, Non-Hispanic population has increased 158.22 percent, and the Native American, Non-Hispanic population has increased 9.42 percent. Although the Black, Non-Hispanic population grew at a slower rate than the Hispanic and Asian or Pacific Islander, Non-Hispanic populations, the total percentage of the population has only slightly decreased from 4.78 percent in 1990 to 4.70 percent currently. The Hispanic population has increased from 2.93 percent of the population in 1990 to 6.70 percent currently. The Asian or Pacific Islander, Non-Hispanic population has increased from 3.77 percent of the population to 6.40 percent currently. The Native American, Non-Hispanic population has slightly decreased from 2.76 percent of the population in 1990 to 2.00 percent currently.

The Racial/Ethnic Dissimilarity Index (DI) generally indicates low segregation for all racial/ethnic groups in the jurisdiction. Over time, the Non-White/White and Black/White DI values have remained relatively steady in Lawrence, while the Hispanic/White DI increased from 10.40 in 1990 to 16.94 currently, and Asian or Pacific Islander/White decreased from 32.29 in 1990 to 25.80 currently. All DI values are still between 0 and 39, which generally indicates low segregation.

ii. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

- 1. Analysis
- a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction and region.

To assist communities in identifying racially or ethnically concentrated areas of poverty (R/ECAPs), HUD has developed a census tract-based definition of R/ECAPs. The definition involves a racial/ethnic group concentration threshold and a poverty test. The racial/ethnic group concentration threshold is straightforward: R/ECAPs must have a non-White population of 50 percent or more. Regarding the poverty threshold, Wilson (1980) defines neighborhoods of "extreme poverty" as census tracts with 40 percent or more of individuals living at or below the poverty line. Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with an alternate criterion. Thus, a neighborhood can be a R/ECAP if it has a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. Census tracts with this extreme poverty that satisfy the racial/ethnic concentration threshold are deemed R/ECAPs.

This translates into the following equation:

Equation 2 - racially or ethnically concentrated areas of poverty (R/ECAPs)

$$\frac{R}{ECAP_i} = yes \dots if \dots \begin{cases} PovRate_i \geq \left[3 * \mu_{PovRate}^{cbsa}\right] \\ or \\ PovRate_i \geq 0.4 \end{cases} \cap \left[\frac{(Pop_i - NHW_i)}{Pop_i}\right] \geq 0.50$$

Where / represents census tracts, $(\mu_{povRate}^{cbsa})$ is the metropolitan/micropolitan (CBSA) mean tract poverty rate, PovRate is the /th tract poverty rate, (NHW_i) is the non-Hispanic White population in tract i, and Pop is the population in tract i.

Table 26 - HUD AFFH Table 4

HUD Table 4 - R/ECAP	(Lawrence, KS) Jurisdiction		(Lawrence, KS) Region			
Demographics						
R/ECAP Race/Ethnicity		#	%		#	%
Total Population in R/ECAPs		0	-		0	-
White, Non-Hispanic		0	N/a		0	N/a
Black, Non-Hispanic		0	N/a		0	N/a
Hispanic		0	N/a		0	N/a
Asian or Pacific Islander, Non-Hispanic		0	N/a		0	N/a
Native American, Non-Hispanic		0	N/a		0	N/a
Other, Non-Hispanic		0	N/a		0	N/a
R/ECAP Family Type						
Total Families in R/ECAPs		0	-		0	
Families with children		0	N/a		0	N/a
R/ECAP National Origin						
Total Population in R/ECAPs		0	-		N/a	
#1 country of origin	Null	0	0.00%	Null	0	0.00%
#2 country of origin	Null	0	0.00%	Null	0	0.00%
#3 country of origin	Null	0	0.00%	Null	0	0.00%
#4 country of origin	Null	0	0.00%	Null	0	0.00%
#5 country of origin	Null	0	0.00%	Null	0	0.00%
#6 country of origin	Null	0	0.00%	Null	0	0.00%
#7 country of origin	Null	0	0.00%	Null	0	0.00%
#8 country of origin	Null	0	0.00%	Null	0	0.00%
#9 country of origin	Null	0	0.00%	Null	0	0.00%
#10 country of origin	Null	0	0.00%	Null	0	0.00%

(Sources: American Community Survey (ACS), 2011-2015; Decennial Census (2010); Brown Longitudinal Tract Database (LTDB) based on decennial census data, 1990, 2000 & 2010)

By using the HUD mapping tool and Table 26, it can be established that neither Lawrence nor the region currently have any census tracts meeting the R/ECAP definition, nor have any existed since 1990.

iii. Disparities in Access to Opportunity

- 1. Analysis
- a. Education
 - i. For the protected class groups HUD has provided data, describe any disparities in access to proficient schools in the jurisdiction and region.

Opportunity Indicators, by Race/Ethnicity shows the opportunity indicators by race/ethnicity in Lawrence and the region as a whole, as well as by total population and population below federal poverty line. According to HUD, a "higher score on each of the indices would indicate: lower neighborhood poverty rates; higher levels of school proficiency; higher levels of labor engagement; closer proximity to jobs; lower transportation costs; closer access to public transportation; and greater neighborhood environmental quality (i.e., lower exposure rates to harmful toxins)."

The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools.

The school proficiency index is a function of the percent of 4th grade students proficient in reading (r) and math (m) on state test scores for up to three schools (i=1,2,3) within 3 miles of the block-group centroid. S denotes 4th grade school enrollment. It is calculated as:

Equation 3 - School Proficiency Index

$$School_i = \sum_{n=i}^{3} \left(\frac{s_i}{\sum^{n} s_i}\right) * \left[\frac{1}{2} * r_i + \frac{1}{2} * m_i\right]$$

Elementary schools are linked with block-groups based on a geographic mapping of attendance area zones from Pitney Bowes, where available. Block groups are matched with up the three schools (closest in distance in the same school district) within 4 miles of the block group centroid. In cases with multiple school matches, an enrollment-weighted score is calculated following the equation above. About 14 percent of block groups have no schools within 4 miles. In such cases, the index is based on the single closest school.

Values are percentile ranked and range from 0 to 100. The higher the score, the higher the school system quality is in a neighborhood.

Table 267 - HUD AFFH Table 12 AFFHT0005 Released 6/19/20

HUD Table 12 – Opportunity	(Lawrence, KS) Jurisdiction	(Lawrence, KS) Region		
Indicators, by Race/Ethnicity	School Proficiency Index	School Proficiency Index		
Total Population				
White, Non-Hispanic	64.09	61.89		
Black, Non-Hispanic	60.07	59.87		
Hispanic	60.64	60.25		
Asian or Pacific Islander, Non-Hispanic	63.24	63.09		
Native American, Non-Hispanic	58.10	57.95		
Population below federal poverty line				
White, Non-Hispanic	62.42	61.99		
Black, Non-Hispanic	61.46	61.28		
Hispanic	63.00	62.53		
Asian or Pacific Islander, Non-Hispanic	62.26	62.22		
Native American, Non-Hispanic	56.20	55.90		

(Sources: Great Schools (proficiency data, 2015-16); Common Core of Data (4th grade school addresses and enrollment, 2015-16); Maponics attendance boundaries, 2016)

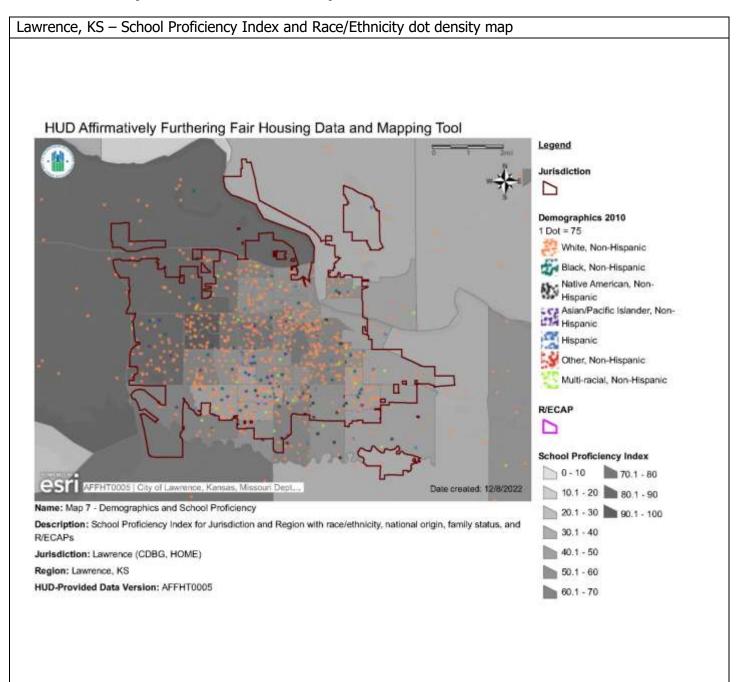
Table 27 provides the School Proficiency Index by race/ethnicity for both Lawrence and the region.

In Lawrence and the region, all Race/Ethnic groups scored above average on the School Proficiency Index. The only group with a noticeably lower score than others is Native American, Non-Hispanic for the total population and the population below federal poverty line, in both Lawrence and the Region.

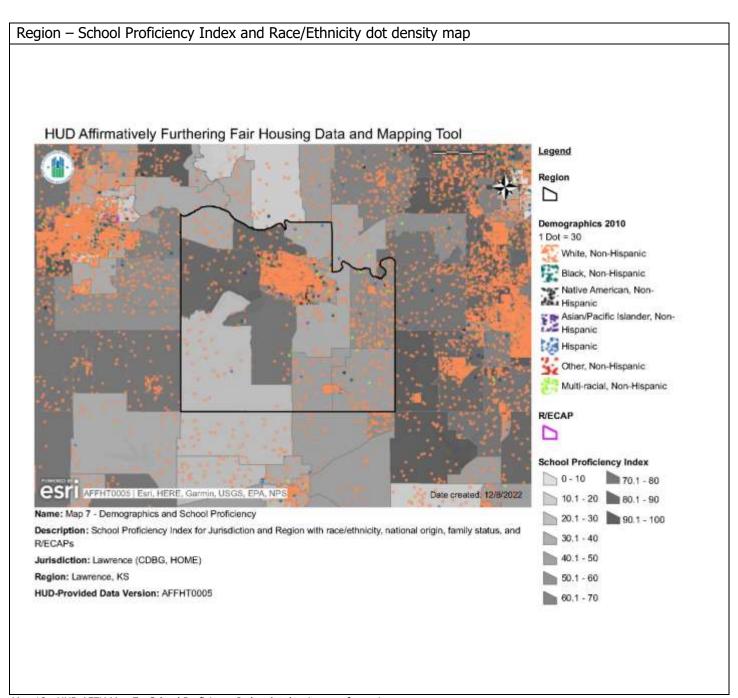
ii. For the protected class groups HUD has provided data, describe how the disparities in access to proficient schools relate to residential living patterns in the jurisdiction and region.

The maps provided by HUD can be used to assess how residency patterns for each of these protected classes compares to the location of proficient schools. The map shows values for the School Proficiency Index with shading at the neighborhood (census tract) level. Darker shaded tracts indicate better access to higher proficiency schools. Lighter shading indicates lower index values, with these neighborhoods being near lower performing elementary schools (as measured by the Index).

School Proficiency Index and Race/Ethnicity



Map 9- HUD AFFH Map 7 - School Proficiency Index dot density map for jurisdiction



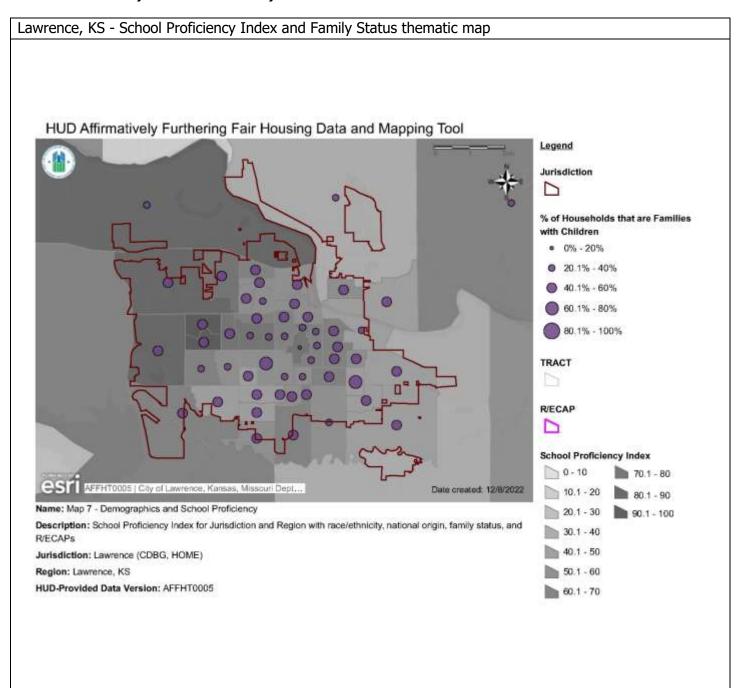
Map 10 - HUD AFFH Map 7 - School Proficiency Index dot density map for region

Table 27 provides the School Proficiency Index by race/ethnicity for both Lawrence and the region. Map 9 displays a School Proficiency Index dot density map for Lawrence showing all races/ethnicity together. Map 10 displays a School Proficiency Index dot density map for the region showing all races/ethnicity together.

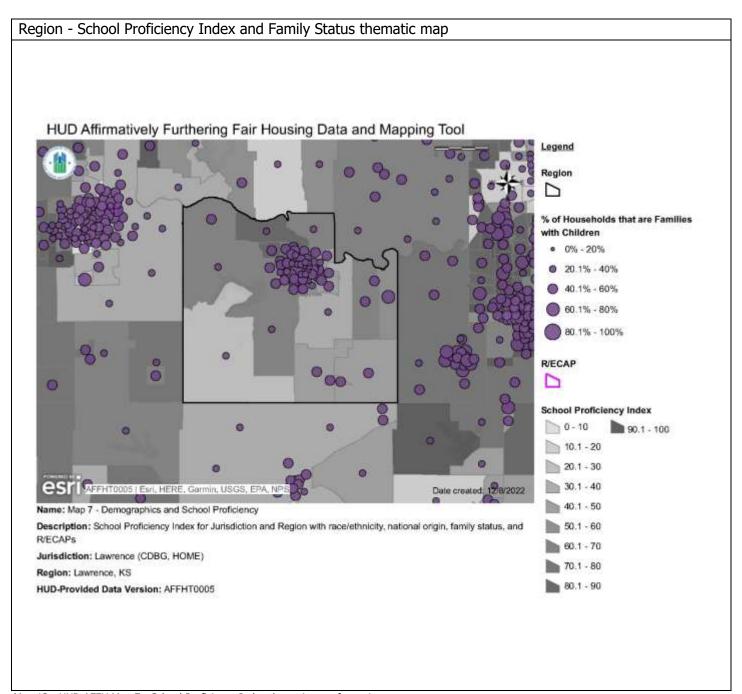
In Lawrence, the darker shaded tracts that indicate better access to higher proficiency schools are located in the West and Northwest areas. The lighter shaded tracts that indicate being near lower performing schools are located in the East, Southeast, and Southcentral areas.

In the region, the darker shaded tracts that indicate better access to higher proficiency schools are located in the West and North areas. The lighter shaded tracts that indicate being near lower performing schools are located in the Southwest area.

School Proficiency Index and Family Status



Map 11 - HUD AFFH Map 7 - School Proficiency Index thematic map for jurisdiction



Map 12 - HUD AFFH Map 7 - School Proficiency Index thematic map for region

Map 11 displays a School Proficiency Index thematic map for Lawrence showing the percent of households that are families with children. Map 12 displays a School Proficiency Index thematic map for the region showing the percent of households that are families with children.

In Lawrence, the lighter shaded tracts that indicate being near lower performing schools are located in the East, Southeast, and Southcentral areas. These areas also indicate a high percentage of households that are families with children. In the region, the lighter shaded tracts that indicate being near lower performing schools are located in the Southwest area, and do not indicate a high percentage of households that are families with children.

b. Employment

i. For the protected class groups HUD has provided data, describe any disparities in access to jobs and labor markets by protected class groups in the jurisdiction and region.

Opportunity Indicators, by Race/Ethnicity shows the opportunity indicators by race/ethnicity in Lawrence and the region as a whole, as well as by total population and population below federal poverty line. According to HUD, a "higher score on each of the indices would indicate: lower neighborhood poverty rates; higher levels of school proficiency; higher levels of labor engagement; closer proximity to jobs; lower transportation costs; closer access to public transportation; and greater neighborhood environmental quality (i.e., lower exposure rates to harmful toxins)."

The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a CBSA, with larger employment centers weighted more heavily. Specifically, a gravity model is used, where the accessibility (*Ai*) of a given residential block group is a summary description of the distance to all job locations, with the distance from any single job location positively weighted by the size of employment (job opportunities) at that location and inversely weighted by the labor supply (competition) to that location. More formally, the model has the following specification shown in Equation 4:

Equation 4 - Jobs Proximity Index

$$A_{i} = \frac{\sum_{j=1}^{n} \frac{E_{j}}{d_{i,j}^{2}}}{\sum_{j=1}^{n} \frac{L_{j}}{d_{i,j}^{2}}}$$

Where i indexes a given residential block group, and j indexes all n block groups within a CBSA. Distance, d, is measured as "as the crow flies" between block groups i and j, with distances less than 1 mile set equal to 1. E represents the number of jobs in block-group j, and L is the number of workers in block-group j.

Values are percentile ranked with values ranging from 0 to 100. The higher the index value, the better the access to employment opportunities for residents in a neighborhood.

Table 278 - HUD AFFH Table 12

HUD Table 12 – Opportunity	(Lawrence, KS) Jurisdiction	(Lawrence, KS) Region		
Indicators, by Race/Ethnicity	Jobs Proximity Index	Jobs Proximity Index		
Total Population				
White, Non-Hispanic	52.10	43.38		
Black, Non-Hispanic	53.41	51.74		
Hispanic	54.24	50.03		
Asian or Pacific Islander, Non-Hispanic	47.35	46.05		
Native American, Non-Hispanic	58.73	55.42		
Population below federal poverty line				
White, Non-Hispanic	57.86	55.38		
Black, Non-Hispanic	53.16	53.46		
Hispanic	58.88	58.21		
Asian or Pacific Islander, Non-Hispanic	47.24	47.12		
Native American, Non-Hispanic	64.69	65.24		

(Sources: Longitudinal Employer-Household Dynamics (LEHD) data, 2017)

Table 28 provides the Jobs Proximity Index by race/ethnicity for both Lawrence and the region.

In Lawrence, Asian or Pacific Islander, Non-Hispanic has the lowest Jobs Proximity Index of 47.35 for the total population, and 47.24 for populations below the federal poverty line. Native American, Non-Hispanic has the highest Jobs Proximity Index of 58.73 for the total population and 64.69 for populations below the federal poverty line. White, Non-Hispanic, Hispanic, and Native American, Non-Hispanic all have a higher Index for those below federal poverty line than for the total population.

In the region, White, Non-Hispanic has the lowest Jobs Proximity Index of 43.38 for the total population while Native American, Non-Hispanic has the highest Index of 55.42. In populations below the federal poverty line, Asian or Pacific Islander, Non-Hispanic has the lowest Index of 47.12 and Native American, Non-Hispanic has the highest Index of 65.24. All race/ethnicity groups have a higher Index for those below federal poverty line than for the total population in the region.

The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract (i). Formally, the labor market index is a linear combination of three standardized vectors: unemployment rate (u), labor-force participation rate (i), and percent with a bachelor's degree or higher (i), using the following formula shown in Equation 5:

Equation 5 - Labor Market Engagement Index

$$LBM_i = \left[\left(\frac{u_i - \mu_u}{\sigma_u} \right) * -1 \right] + \left(\frac{l_i - \mu_l}{\sigma_l} \right) + \left(\frac{b_i - \mu_b}{\sigma_b} \right)$$

Where the means (μ_u, μ_l, μ_b) and standard errors $(\sigma_u, \sigma_l, \sigma_b)$ are estimated over the national distribution. Also, the value for the standardized unemployment rate is multiplied by -1.

Values are percentile ranked nationally and range from 0 to 100. The higher the score, the higher the labor force participation and human capital in a neighborhood.

Table 29 - HUD AFFH Table 12

HUD Table 12 - Opportunity	(Lawrence, KS) Jurisdiction	(Lawrence, KS) Region
Indicators, by Race/Ethnicity	Labor Market Index	Labor Market Index
Total Population		
White, Non-Hispanic	80.57	80.42
Black, Non-Hispanic	78.05	78.19
Hispanic	78.85	78.68
Asian or Pacific Islander, Non-Hispanic	73.02	73.32
Native American, Non-Hispanic	79.86	79.64
Population below federal poverty line		
White, Non-Hispanic	80.15	80.08
Black, Non-Hispanic	75.29	75.17
Hispanic	78.67	78.83
Asian or Pacific Islander, Non-Hispanic	76.53	76.60
Native American, Non-Hispanic	77.64	77.21

(Sources: ACS, 2011-2015)

Table 29 provides the Labor Market Index by race/ethnicity for both Lawrence and the region.

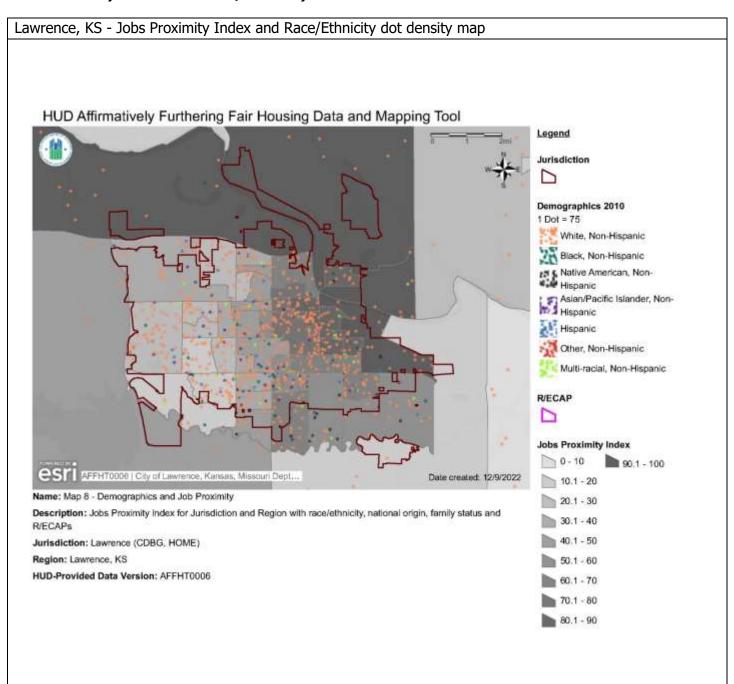
In Lawrence, all race/ethnicity groups have a high Labor market Engagement Index, on a scale of 0 to 100. For the total population, Asian or Pacific Islander, Non-Hispanic has the lowest Index of 73.02 while White, Non-Hispanic has the highest Index of 80.57. In populations below federal poverty line, Black, Non-Hispanic has the lowest Index of 75.29 and White, Non-Hispanic has the highest Index of 80.15. Asian or Pacific Islander, Non-Hispanic, has a higher Index for those below federal poverty line than for the total population.

In the region, all race/ethnicity groups have a high Labor market Engagement Index, on a scale of 0 to 100. For the total population, Asian or Pacific Islander, Non-Hispanic has the lowest Index of 73.32 while White, Non-Hispanic has the highest Index of 80.42. In populations below federal poverty line, Black, Non-Hispanic has the lowest index of 75.17 and White, Non-Hispanic has the highest Index of 80.08. Hispanic and Asian or Pacific Islander, Non-Hispanic both have a higher Index for those below federal poverty line than for the total population.

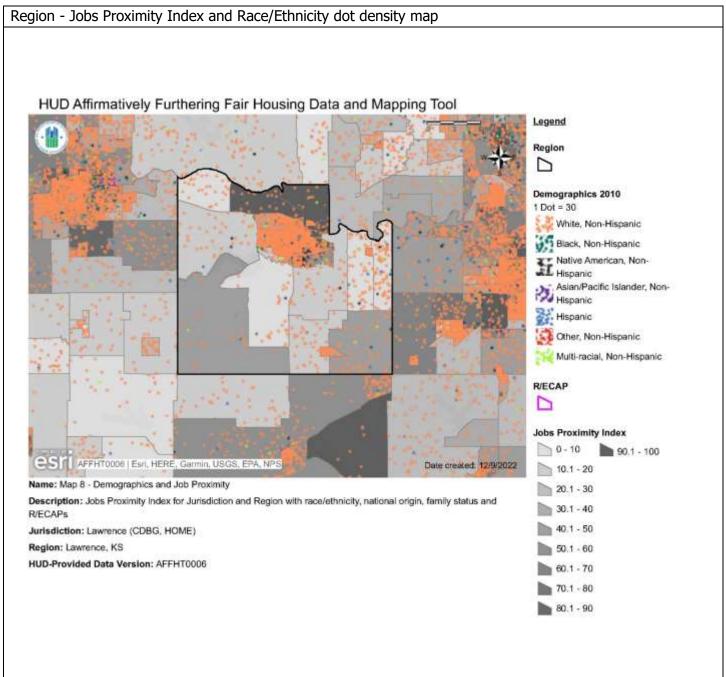
ii. For the protected class groups HUD has provided data, describe how disparities in access to employment relate to residential living patterns in the jurisdiction and region.

The maps provided by HUD show residency patterns of racial/ethnic and families with children. The Jobs Proximity Index map and the Labor Market Engagement map both show shading at the neighborhood (census tract) level. Darker shaded tracts indicate a higher (better) value for the Index being used. Thus, darker shaded tracts would indicate closer proximity to jobs or a higher level of "labor engagement" (employment rate, labor-force participation rate, and percent of the population age 25 and above with at least a bachelor's degree) for the households living there. Lighter shaded tracts would show lower (worse) index values for these index measures.

Jobs Proximity Index and Race/Ethnicity



Map 13 - HUD AFFH Map 8 - Jobs Proximity Index dot density map for jurisdiction



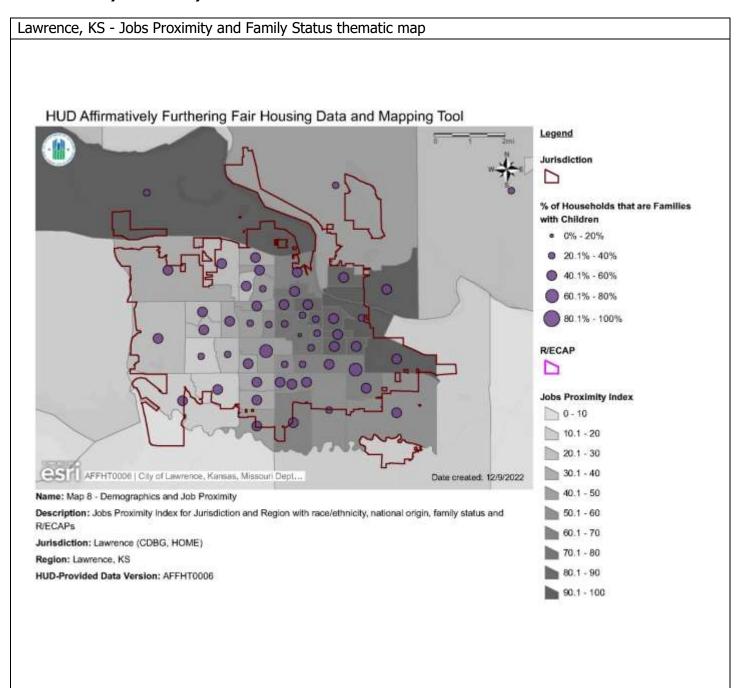
Map 14 - HUD AFFH Map 8 - Jobs Proximity Index dot density map for region

Table 28 provides the Jobs Proximity Index by race/ethnicity for both Lawrence and the region. Map 13 displays a Jobs Proximity Index dot density map for Lawrence showing all races/ethnicity together. Map 14 displays a Jobs Proximity Index dot density map for the region showing all races/ethnicity together.

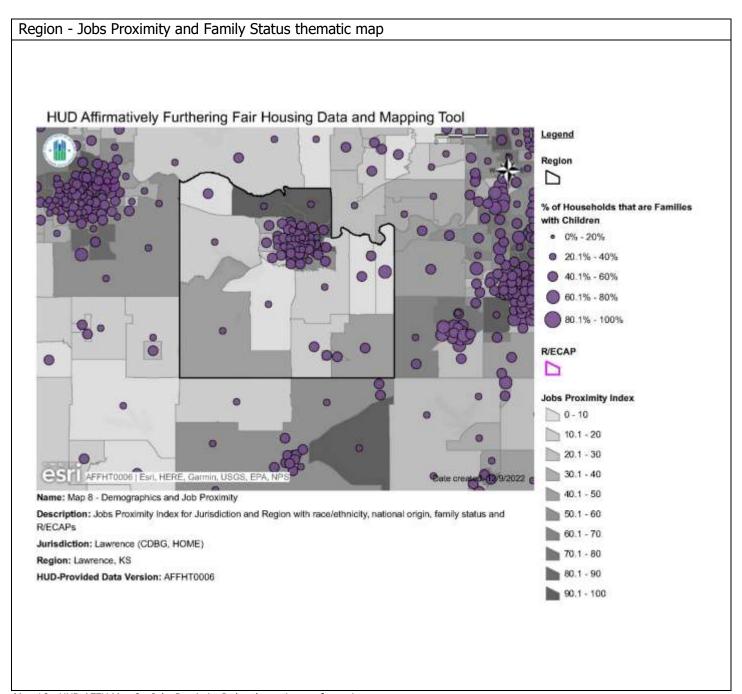
In Lawrence, the darker shaded tracts that indicate closer proximity to jobs are located in the North and East areas of town. The lighter shaded tracts that indicate a farther proximity to jobs are located in the Northwest and Southwest areas.

In the region, the darker shaded tracts that indicate closer proximity to jobs are located in the Northcentral, Southwest, and Southeast areas. The lighter shaded tracts that indicate a farther proximity to jobs are located in the Northwest, East, and Central areas.

Jobs Proximity and Family Status



Map 15 - HUD AFFH Map 8 - Jobs Proximity Index thematic map for jurisdiction

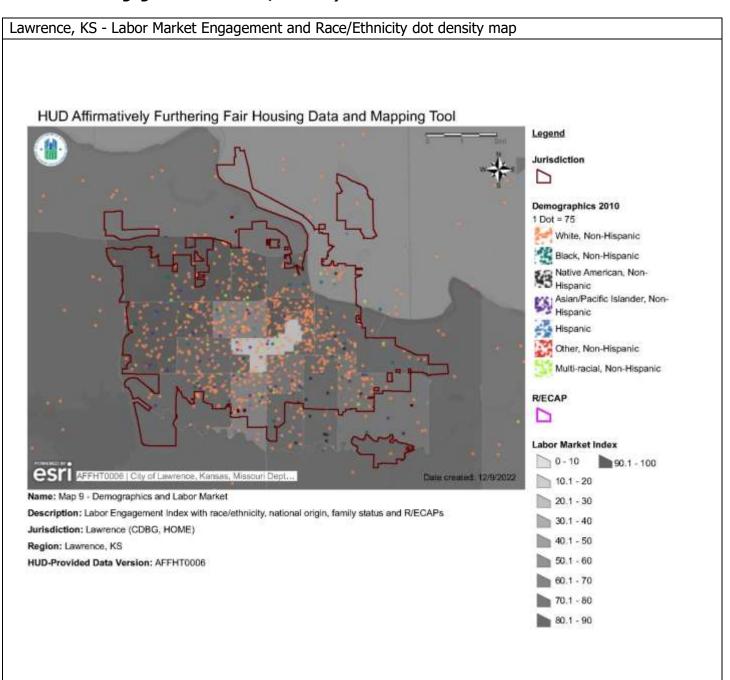


Map 16 - HUD AFFH Map 8 - Jobs Proximity Index thematic map for region

Map 15 displays a Jobs Proximity Index thematic map for Lawrence showing the percent of households that are families with children. Map 16 displays a Jobs Proximity Index thematic map for the region showing the percent of households that are families with children.

In Lawrence, the lighter shaded tracts that indicate a farther proximity to jobs are located in the Northwest and Southwest areas. These areas also indicate a higher percentage of households that are families with children. In the region, lighter shaded tracts that indicate a farther proximity to jobs are located in the Northwest, East, and Central areas. These areas also indicate a higher percentage of households that are families with children.

Labor Market Engagement and Race/Ethnicity



Map 17 - HUD AFFH Map 9 - Labor Market Engagement Index dot density map for jurisdiction



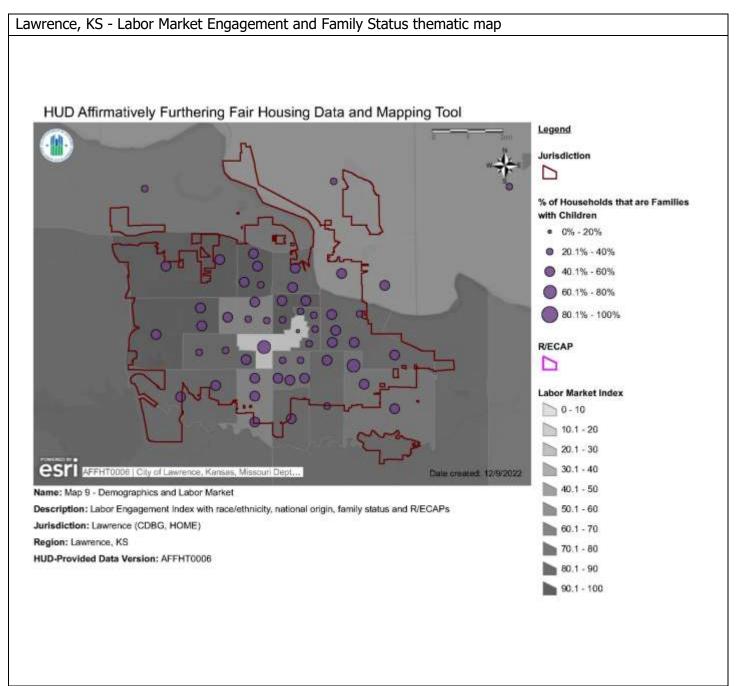
Map 18 - HUD AFFH Map 9 - Labor Market Engagement Index dot density map for region

Table 29 provides the Labor Market Engagement Index by race/ethnicity for both Lawrence and the region. Map 17 displays a Labor Market Engagement Index dot density map for Lawrence showing all races/ethnicity together. Map 18 displays a Labor Market Engagement Index dot density map for the region showing all races/ethnicity together.

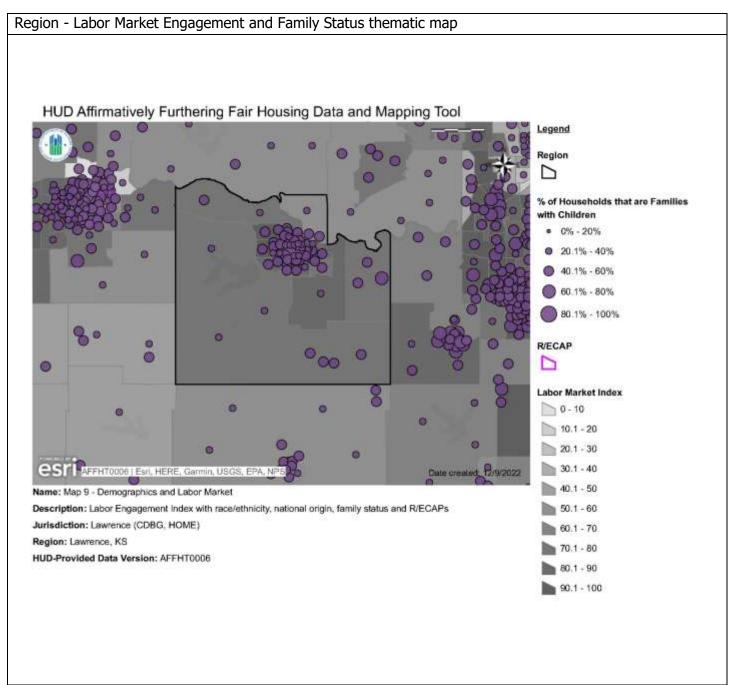
In Lawrence, all Race/Ethnic groups have a high Labor Market Engagement Index, on a scale of 0 to 100. The darker shaded tracts that indicate higher levels of labor engagement (unemployment rate, labor-force participation rate, and percent of the population age 25 and above with at least a bachelor's degree) are located in the West, Northwest, and Northcentral areas. The lighter shaded tracts that indicate lower levels of labor engagement are located in the Central area around The University of Kansas.

In the region, all Race/Ethnic groups have a high Labor market Engagement Index, on a scale of 0 to 100. The darker shaded tracts that indicate higher levels of labor engagement (unemployment rate, labor-force participation rate, and percent of the population age 25 and above with at least a bachelor's degree) are in the Central areas. The lighter shaded tracts that indicate lower levels of labor engagement are in the Northcentral areas.

Labor Market Engagement and Family Status



Map 19 - HUD AFFH Map 9 - Labor Market Engagement Index thematic map for jurisdiction



Map 20 - HUD AFFH Map 9 - Labor Market Engagement Index thematic map for region

Map 19 displays a Labor Market Engagement Index thematic map for Lawrence showing the percent of households that are families with children. Map 20 displays a Labor Market Engagement Index thematic map for the region showing the percent of households that are families with children.

In Lawrence, the lighter shaded tracts that indicate lower levels of labor engagement (unemployment rate, labor-force participation rate, and percent of the population age 25 and above with at least a bachelor's degree) are located in the Central area around The University of Kansas. These areas also indicate a high percentage of households that are families with children. In the region, the lighter shaded tracts that indicate lower levels of labor engagement are located in the Northcentral areas. These areas also indicate a high percentage of households that are families with children.

c. Transportation

i. For the protected class groups HUD has provided data, describe any disparities in access to transportation related to costs and access to public transit in the jurisdiction and region.

Opportunity Indicators, by Race/Ethnicity shows the opportunity indicators by race/ethnicity in Lawrence and the region as a whole, as well as by total population and population below federal poverty line. According to HUD, a "higher score on each of the indices would indicate: lower neighborhood poverty rates; higher levels of school proficiency; higher levels of labor engagement; closer proximity to jobs; lower transportation costs; closer access to public transportation; and greater neighborhood environmental quality (i.e., lower exposure rates to harmful toxins)."

The Low Transportation Cost Index is based on estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region (i.e. CBSA). The estimates come from the Location Affordability Index (LAI). The data correspond to those for household type 6 (hh_type6_) as noted in the LAI data dictionary. More specifically, among this household type, the AFFH-T models transportation costs as a percent of income for renters (t_rent). Neighborhoods are defined as census tracts.

Values are inverted and percentile ranked nationally, with values ranging from 0 to 100. The higher the transportation cost index, the lower the cost of transportation in that neighborhood. Transportation costs may be low for a variety of reasons, including greater access to public transportation and the density of homes, services, and jobs in the neighborhood and surrounding community.

Table 280 - HUD AFFH Table 12

HUD Table 12 - Opportunity Indicators, by Race/Ethnicity	(Lawrence, KS) Jurisdiction Low Transportation Cost Index	(Lawrence, KS) Region Low Transportation Cost Index
Total Population		
White, Non-Hispanic	47.22	41.21
Black, Non-Hispanic	47.63	45.98
Hispanic	48.03	44.95
Asian or Pacific Islander, Non-Hispanic	51.17	49.97
Native American, Non-Hispanic	43.85	42.12
Population below federal poverty line		
White, Non-Hispanic	51.28	49.50
Black, Non-Hispanic	50.15	49.94
Hispanic	51.51	50.96
Asian or Pacific Islander, Non-Hispanic	49.80	49.75
Native American, Non-Hispanic	46.23	45.94

(Sources: Location Affordability Index (LAI) data, 2012-2016)

Table 30 provides the Low Transportation Cost Index by race/ethnicity for both Lawrence and the region.

The Low Transportation Cost Index measures cost of transportation and the proximity to public transportation by neighborhood. The higher number indicates lower transportation costs and closer proximity to public transportation. In Lawrence, all Race/Ethnic groups scored below average except for Asian or Pacific Islander, Non-Hispanic, and all are close in index number. The only group with a noticeably lower score is Native American, Non-Hispanic with an Index of 43.85. For all Race/Ethnic groups, the Index

is higher for the population below federal poverty line versus the total population, except for Asian or Pacific Islander, Non-Hispanic.

In the region, all Race/Ethnic groups scored below average on the Low Transportation Index, and all were lower than those in the jurisdiction. The lowest Index in the region for the total population is for the White, Non-Hispanic group at 41.21. For all Race/Ethnic groups, the Index is higher for the population below the federal poverty line versus the total population, except for Asian or Pacific Islander, Non-Hispanic.

Table 291 - HUD AFFH Table 12

HUD Table 12 – Opportunity	(Lawrence, KS) Jurisdiction	(Lawrence, KS) Region
Indicators, by Race/Ethnicity	Transit Trips Index	Transit Trips Index
Total Population		
White, Non-Hispanic	64.25	56.26
Black, Non-Hispanic	63.70	61.72
Hispanic	63.39	59.63
Asian or Pacific Islander, Non-Hispanic	66.87	65.39
Native American, Non-Hispanic	46.40	45.28
Population below federal poverty line		
White, Non-Hispanic	69.44	67.15
Black, Non-Hispanic	69.47	69.31
Hispanic	68.48	67.64
Asian or Pacific Islander, Non-Hispanic	63.40	63.33
Native American, Non-Hispanic	61.66	61.61

(Sources: Location Affordability Index (LAI) data, 2012-2016)

Table 31 provides the Transit Trips Index by race/ethnicity for both Lawrence and the region.

The Transit Trips Index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region (i.e., CBSA). The estimates come from the Location Affordability Index (LAI). The data used in the AFFH-T correspond to those for household type 6 (hh_type6_) as noted in the LAI data dictionary. More specifically, among this household type, the AFFH-T models annual transit trips for renters (transit_trips_rent). Neighborhoods are defined as census tracts.

Values are percentile ranked nationally, with values ranging from 0 to 100. The higher the value, the more likely residents in that neighborhood utilize public transit. The index controls for income such that a higher index value will often reflect better access to public transit.

The Transit Trips Index measures how often low-income families in a neighborhood use public transportation. The higher number indicates more frequent use of public transportation. In Lawrence, all Race/Ethnic groups scored above average on the Transit Trips Index, except Native American, Non-Hispanic, and are all close in number. The only group with a noticeably lower score for the total population is Native American, Non-Hispanic with an Index of 46.40. For all Race/Ethnic groups, the Index is higher for the population below the federal poverty line versus the total population, except for Asian or Pacific Islander, Non-Hispanic. The Native American, Non-Hispanic population below federal poverty line has an Index of 61.66.

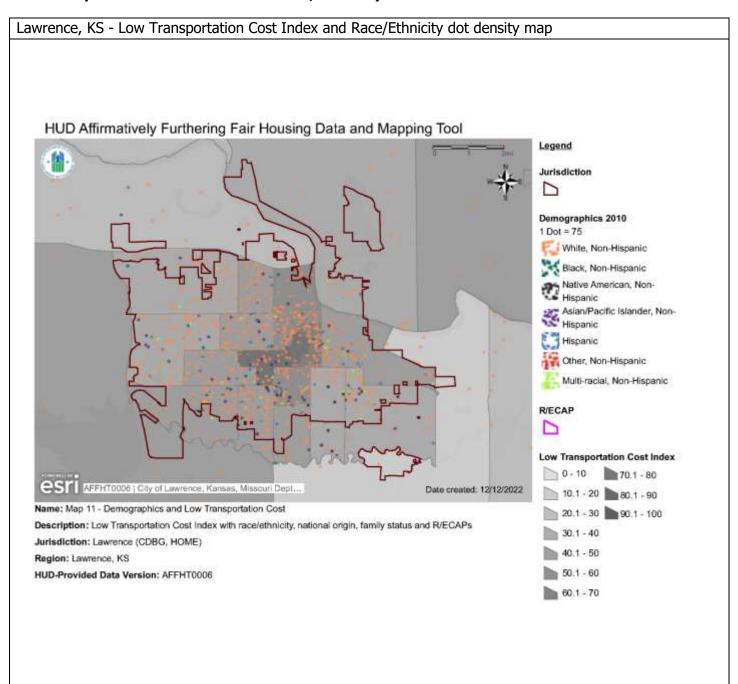
In the region, all Race/Ethnic groups scored above average on the Transit Trips Index, except Native American, Non-Hispanic, and all were lower than those in the jurisdiction. The lowest Index in the region

for the total population is for Native American, Non-Hispanic at 45.28. For all Race/Ethnic groups, the Index is higher for the population below the federal poverty line versus the total population, except Asian or Pacific Islander, Non-Hispanic. The Native American, Non-Hispanic population below the federal poverty line has the lowest Index in the region at 61.61.

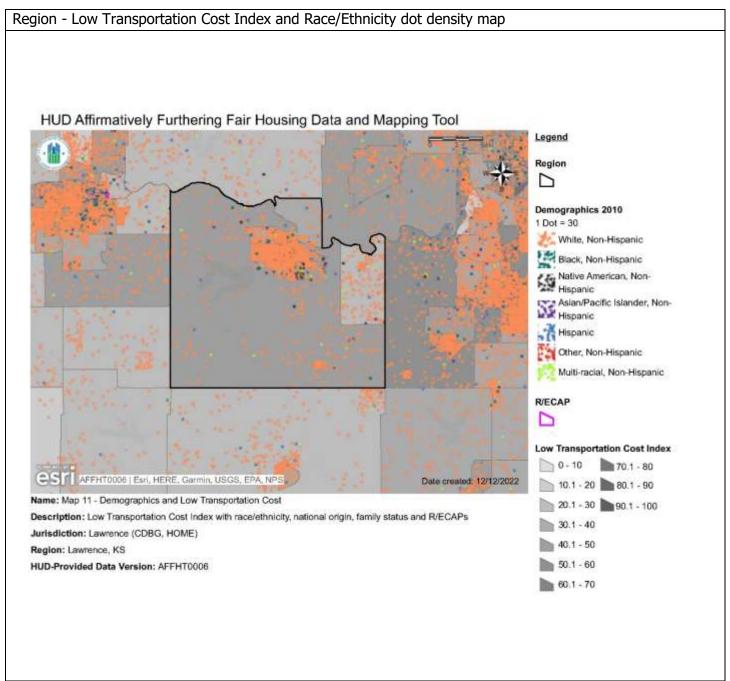
ii. For the protected class groups HUD has provided data, describe how disparities in access to transportation related to residential living patterns in the jurisdiction and region.

The maps provided by HUD show residency patterns of racial/ethnic and families with children. The Low Transportation Cost Index map and the Transit Trips Index maps both show shading at the neighborhood (census tract) level. Darker shaded tracts indicate a higher (better) value for the Index being used. Thus, darker shaded tracts would indicate lower transportation costs or better access to public transit for the households living there. Lighter shaded tracts would show higher transportation costs and less access to transit.

Low Transportation Cost Index and Race/Ethnicity



Map 21 - HUD AFFH Map 11 - Low Transportation Cost Index dot density map for jurisdiction



Map 22 - HUD AFFH Map 11 - Low Transportation Cost Index dot density map for region

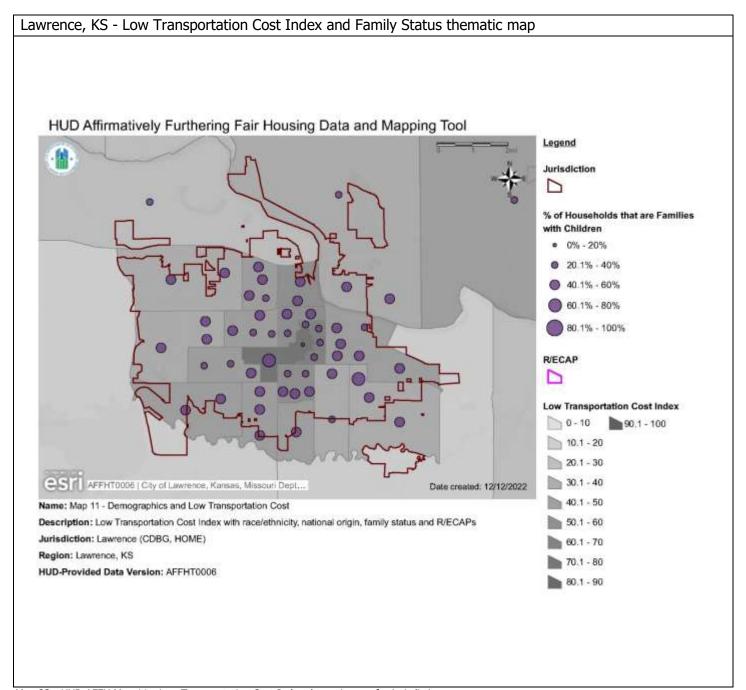
Table 30 provides the Low Transportation Cost Index by race/ethnicity for both Lawrence and the region. Map 21 displays a Low Transportation Cost Index dot density map for Lawrence showing all races/ethnicity together. Map 22 displays a Low Transportation Cost Index dot density map for the region showing all races/ethnicity together.

In Lawrence, the darker shaded tracts that indicate lower transportation costs are located in the Central area around The University of Kansas. The lighter shaded tracts that indicated higher transportation costs are located in the Northeast, Northwest, West, and Southeast areas of Lawrence.

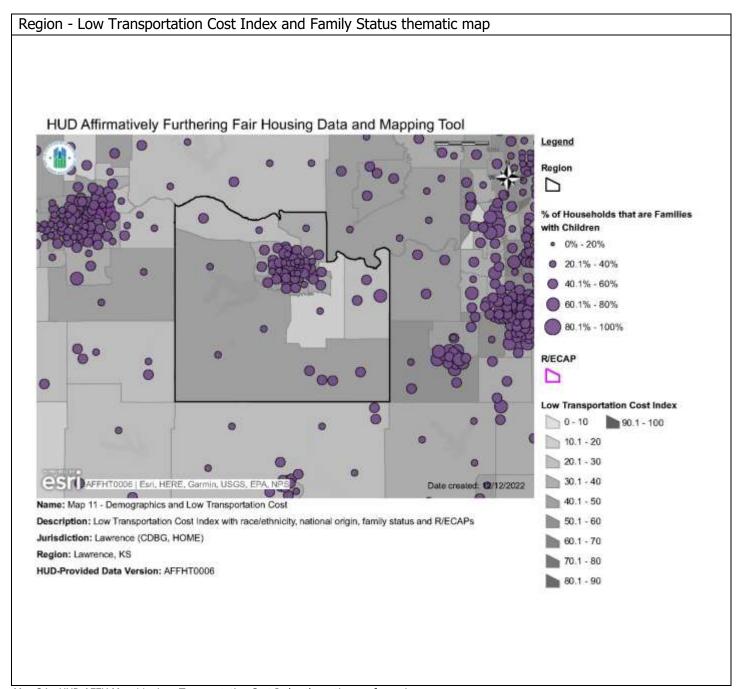
In the region, the darker shaded tracts that indicate lower transportation costs are even across the majority areas of the region. The lighter shaded tracts that indicate higher transportation costs are in East

and North areas of the region. The darker shaded tracts that indicate lower transportation costs are located in the remainder of tracts in the region.

Low Transportation Cost Index and Family Status



Map 23 - HUD AFFH Map 11 - Low Transportation Cost Index thematic map for jurisdiction

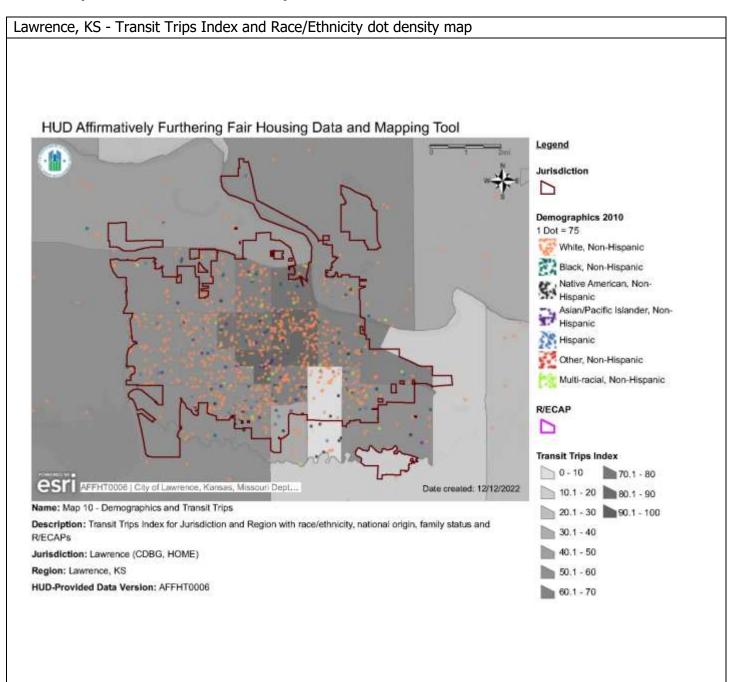


Map 24 - HUD AFFH Map 11 - Low Transportation Cost Index thematic map for region

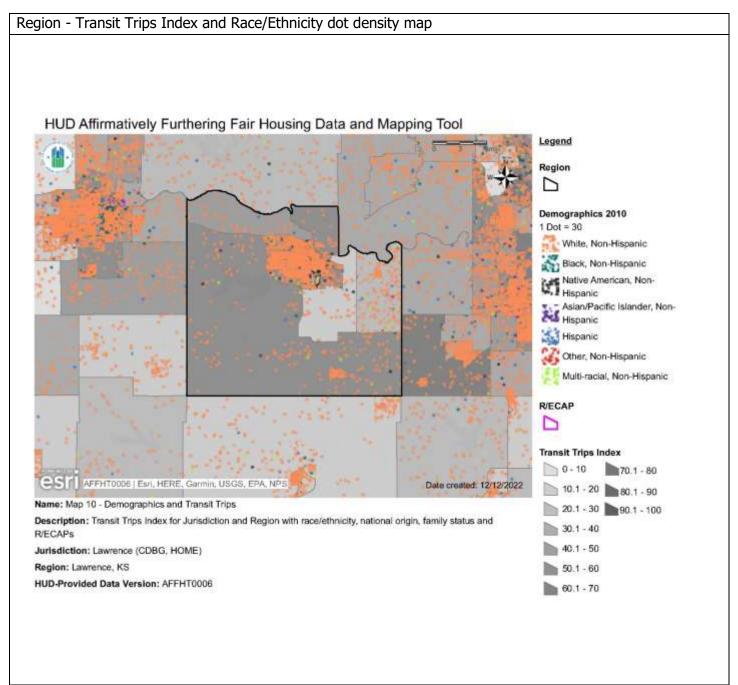
Map 23 displays a Low Transportation Cost Index thematic map for Lawrence showing the percent of households that are families with children. Map 24 displays a Low Transportation Cost Index thematic map for the region showing the percent of households that are families with children.

In Lawrence, the lighter shaded tracts that indicate higher transportation costs are located in the Northeast, Northwest, West, and Southeast areas. These tracts also indicated a high percentage of households that are families with children. In the region, the lighter shaded tracts that indicate higher transportation costs are in the Northwest, Central, and East areas of the region. These tracts also indicated a high percentage of households that are families with children.

Transit Trips Index and Race/Ethnicity



Map 25 - HUD AFFH Map 10 - Transit Trips Index dot density map for jurisdiction



Map 26 - HUD AFFH Map 10 - Transit Trips Index dot density map for region

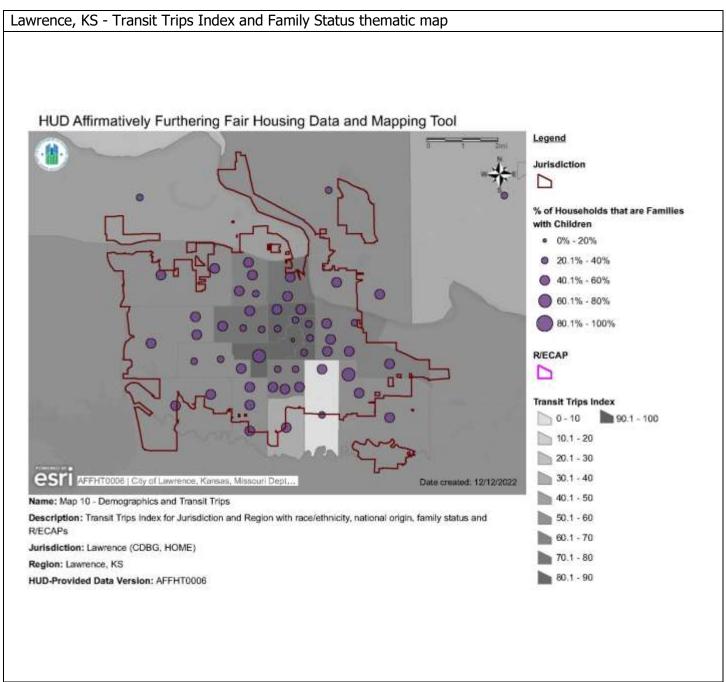
Table 31 provides the Transit Trips Index by race/ethnicity for both Lawrence and the region. Map 25 displays a Transit Trips Index dot density map for Lawrence showing all races/ethnicity together. Map 26 displays a Transit Trips Index dot density map for the region showing all races/ethnicity together.

The Transit Trips Index measures how often low-income families in a neighborhood use public transportation. The higher number indicates more frequent use of public transportation.

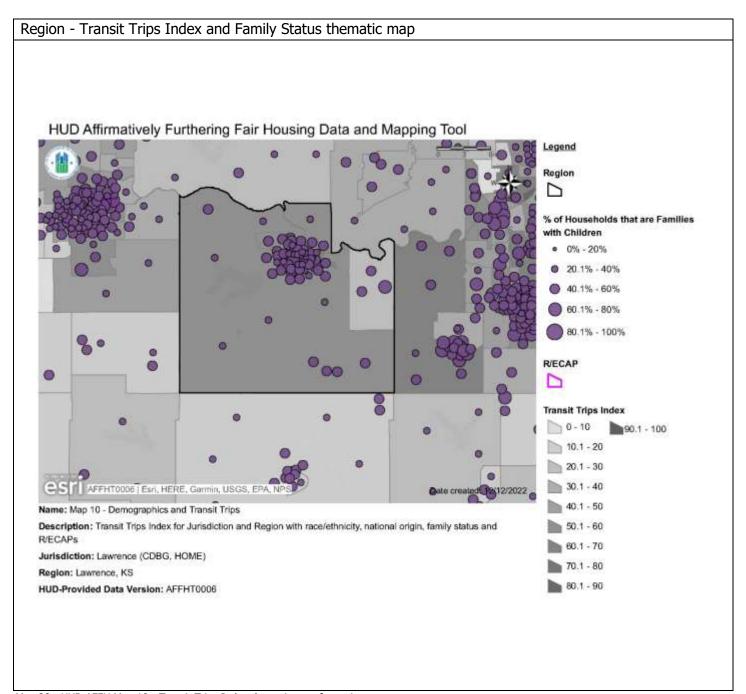
In Lawrence, the darker shaded tracts that indicate more frequent use of public transportation by low-income families are located in the Central and Northcentral areas. The lighter shaded tracts that indicate less use of public transportation by low-income families are located in the Southcentral areas.

In the region, the darker shaded tracts that indicate more frequent use of public transportation by low-income families are located in the North, West, and South areas. The lighter shaded tracts that indicate less use of public transportation by low-income families are located in the Central and the East areas.

Transit Trips Index and Family Status



Map 27 - HUD AFFH Map 10 - Transit Trips Index thematic map for jurisdiction



Map 28 - HUD AFFH Map 10 - Transit Trips Index thematic map for region

Map 27 displays a Transit Trips Index thematic map for Lawrence showing the percent of households that are families with children. Map 28 displays a Transit Trips Index thematic map for the region showing the percent of households that are families with children.

In Lawrence, the lighter shaded tracts that indicate less use of public transportation by low-income families are located in the Southcentral areas. These tracts also have households that are families with children. In the region, the lighter shaded tracts that indicate less use of public transportation by low-income families are in the East areas. These tracts also indicated a high percentage of households that are families with children.

d. Access to Low Poverty Neighborhoods

i. For the protected class groups HUD has provided data, describe any disparities in access to low poverty neighborhoods in the jurisdiction and region.

Opportunity Indicators, by Race/Ethnicity shows the opportunity indicators by race/ethnicity in Lawrence and the region as a whole, as well as by total population and population below federal poverty line. According to HUD, a "higher score on each of the indices would indicate: lower neighborhood poverty rates; higher levels of school proficiency; higher levels of labor engagement; closer proximity to jobs; lower transportation costs; closer access to public transportation; and greater neighborhood environmental quality (i.e., lower exposure rates to harmful toxins)."

The Low Poverty Index captures poverty in a given neighborhood. The index is based on the poverty rate (pv), as shown in Equation 6.

Equation 6 - Low Poverty Index

$$Pov_i = \left[\left(\frac{pv_i - \mu_{pv}}{\sigma_{pv}} \right) * -1 \right]$$

The mean $(\mu_{pv})_{
m and\ standard\ error}$ $(\sigma_{pv})_{
m are\ estimated\ over\ the\ national\ distribution.}$

The poverty rate is determined at the census tract level.

Values are inverted and percentile ranked nationally. The resulting values range from 0 to 100. The higher the score, the less exposure to poverty in a neighborhood.

Table 302 - HUD AFFH Table 12

HUD Table 12 – Opportunity	(Lawrence, KS) Jurisdiction	(Lawrence, KS) Region
Indicators, by Race/Ethnicity	Low Poverty Index	Low Poverty Index
Total Population		
White, Non-Hispanic	59.13	61.61
Black, Non-Hispanic	54.69	55.81
Hispanic	54.23	55.92
Asian or Pacific Islander, Non-Hispanic	54.18	54.80
Native American, Non-Hispanic	56.17	57.10
Population below federal poverty line		
White, Non-Hispanic	53.71	54.73
Black, Non-Hispanic	55.19	55.40
Hispanic	47.46	48.02
Asian or Pacific Islander, Non-Hispanic	56.16	56.24
Native American, Non-Hispanic	51.74	52.13

(Sources: American Community Survey, 2011-2015)

Table 32 provides the Low Poverty Index by race/ethnicity for both Lawrence and the region. The Low Poverty Index measures concentration of poverty by neighborhood. In effect, a higher value on this index indicates a higher likelihood that a family may live in a low poverty neighborhood. A lower value on the Index indicates that households in the protected group have a higher likelihood of living in a neighborhood with higher concentrations of poverty.

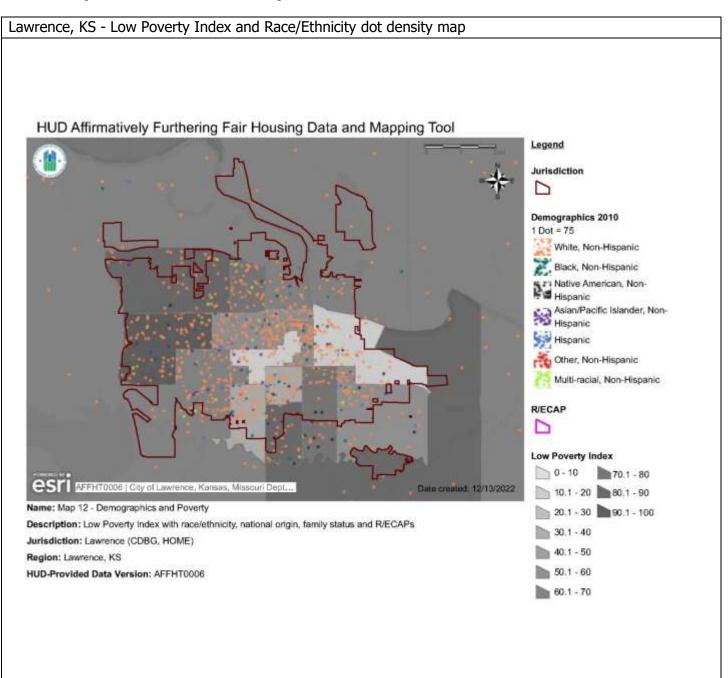
In Lawrence, all Race/Ethnic groups scored above average on the Low Poverty Index and are all close in number for the total population. The White/Non-Hispanic in the total population has a slightly higher Index at 59.13, while the Hispanic population has the lowest Index at 54.18. For all Race/Ethnic groups, the Index is lower for the population below federal poverty line versus the total population, except Black, Non-Hispanic and Asian or Pacific Islander, Non-Hispanic, with Hispanic having the lowest Index of 47.46 for the population below the federal poverty line.

In the region, all Race/Ethnic groups scored above average on the Low Poverty Index for the total population and are all close in number and higher than the jurisdiction. The White/Non-Hispanic in the total population has the highest Index at 61.61, while the Asian or Pacific Islander, Non-Hispanic population has the lowest Index at 54.80. For all Race/Ethnic groups, the Index is lower for the population below federal poverty line versus the total population, except Asian or Pacific Islander, Non-Hispanic with Hispanic having the lowest Index of 48.02 for the population below the federal poverty line.

ii. For the protected class groups HUD has provided data, describe how disparities in access to low poverty neighborhoods relate to residential livings patterns of those groups in the jurisdiction and region.

The maps provided by HUD show residency patterns of racial/ethnic and families with children. The Low Poverty Index map shows shading at the neighborhood (census tract) level. Darker shading (i.e. a higher value on the index) in a tract indicates a lower level of poverty. Lighter shading in a tract indicates a lower (worse) value on the Index and thus a higher concentration of poverty in that tract.

Low Poverty Index and Race/Ethnicity



Map 29 - HUD AFFH Map 12 - Low Poverty Index dot density map for jurisdiction



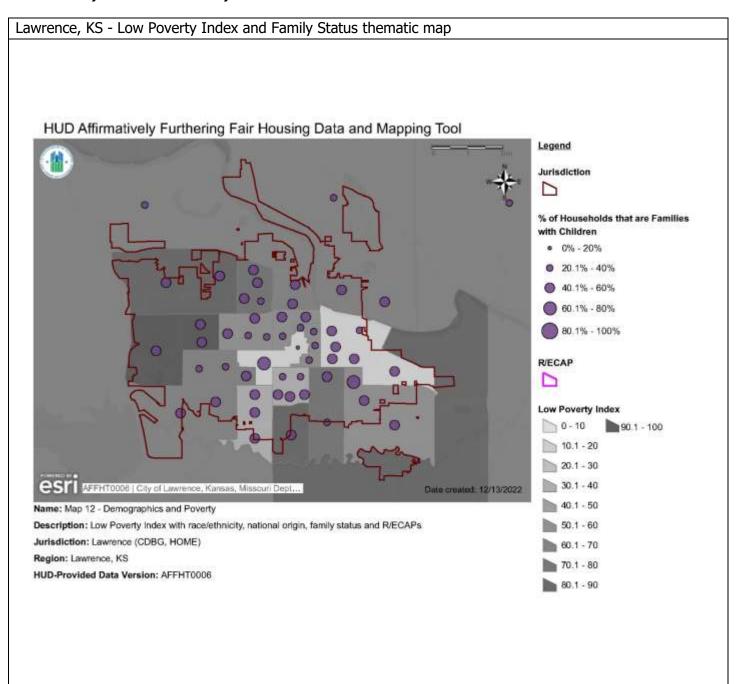
Map 30 - HUD AFFH Map 12 - Low Poverty Index dot density map for region

Table 32 provides the Low Poverty Index by race/ethnicity for both Lawrence and the region. Map 29 displays a Low Poverty Index dot density map for Lawrence showing all races/ethnicity together. Map 30 displays a Low Poverty Index dot density map for the region showing all races/ethnicity together.

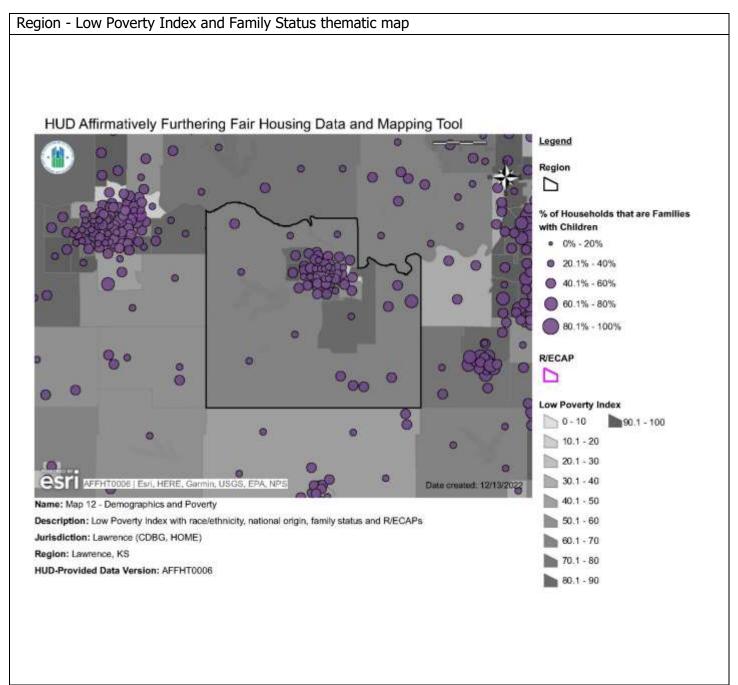
In Lawrence, the darker shaded tracts that indicate a lower level of poverty are located in the Northwest, West, and Southcentral areas. The lighter shaded tracts that indicate a higher concentration of poverty are located in the Central and East areas.

In the region, the darker shaded tracts that indicate a lower level of poverty are located throughout the entire area.

Low Poverty Index and Family Status



Map 31 - HUD AFFH Map 12 - Low Poverty Index thematic map for jurisdiction



Map 32 - HUD AFFH Map 12 - Low Poverty Index thematic map for region

Map 31 displays a Low Poverty Index thematic map for Lawrence showing the percent of households that are families with children. Map 32 displays a Low Poverty Index thematic map for the region showing the percent of households that are families with children.

In Lawrence, the lighter shaded tracts that indicate a higher concentration of poverty are located in the Central and East areas. In the region, the darker shaded tracts that indicate a lower level of poverty are located in the Central area.

e. Access to Environmentally Healthy Neighborhoods

i. For the protected class groups HUD has provided data, describe any disparities in access to environmentally healthy neighborhoods in the jurisdiction and region.

Opportunity Indicators, by Race/Ethnicity shows the opportunity indicators by race/ethnicity in Lawrence and the region as a whole, as well as by total population and population below federal poverty line. According to HUD, a "higher score on each of the indices would indicate: lower neighborhood poverty rates; higher levels of school proficiency; higher levels of labor engagement; closer proximity to jobs; lower transportation costs; closer access to public transportation; and greater neighborhood environmental quality (i.e., lower exposure rates to harmful toxins)."

The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. The index is a linear combination of standardized EPA estimates of air quality carcinogenic (c), respiratory (r) and neurological (n) hazards with i indexing census tracts, as shown in Equation 7.

Equation 7 - Environmental Health Index

$$EnvHealth_i = \left[\left(\frac{c_i - \mu_c}{\sigma_c} \right) + \left(\frac{r_i - \mu_r}{\sigma_r} \right) + \left(\frac{n_i - \mu_n}{\sigma_n} \right) \right] * -1$$

Where means (μ_c, μ_r, μ_n) and standard errors $(\sigma_c, \sigma_r, \sigma_n)$ are estimated over the national distribution.

Values are inverted and then percentile ranked nationally. Values range from 0 to 100. The higher the index value, the less exposure to toxins harmful to human health. Therefore, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census tract.

Table 313 - HUD AFFH Table 12

HUD Table 12 – Opportunity Indicators, by Race/Ethnicity	(Lawrence, KS) Jurisdiction Environmental Health Index	(Lawrence, KS) Region Environmental Health Index
Total Population		
White, Non-Hispanic	65.87	68.66
Black, Non-Hispanic	66.28	66.99
Hispanic	66.11	67.44
Asian or Pacific Islander, Non-Hispanic	65.81	66.28
Native American, Non-Hispanic	66.45	67.28
Population below federal poverty line		
White, Non-Hispanic	64.55	65.35
Black, Non-Hispanic	64.78	64.83
Hispanic	65.31	65.51
Asian or Pacific Islander, Non-Hispanic	66.88	66.91
Native American, Non-Hispanic	65.61	65.66

(Sources: National Air Toxics Assessment (NATA) data, 2014)

Table 33 provides the Environmental Health Index by race/ethnicity for both Lawrence and the region.

The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory, and neurological toxins by neighborhood.

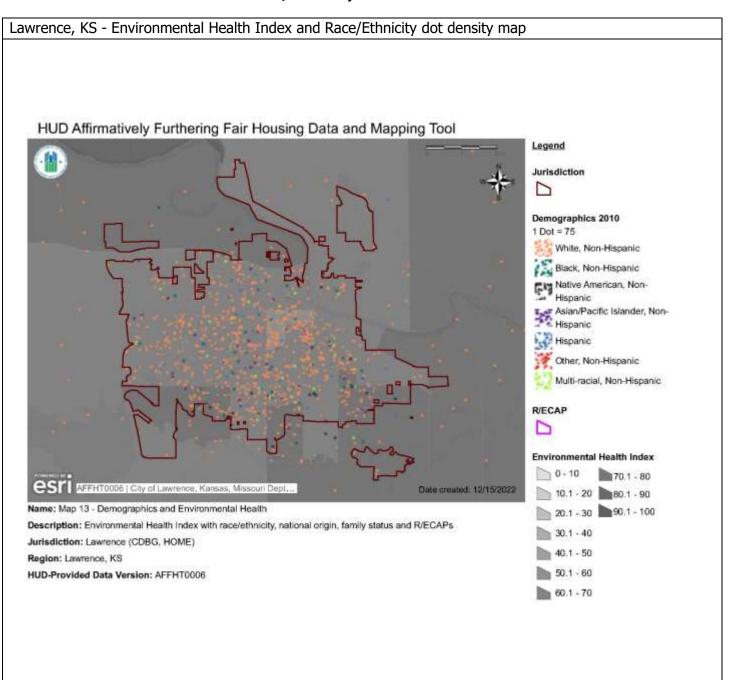
In Lawrence, all Race/Ethnic groups scored above average on Environmental Health Index and are all close in number for the total population. The Native American, Non-Hispanic population has the highest Index for the total population at 66.45. The Asian or Pacific Islander, Non-Hispanic has the lowest Index for the total population at 65.81. For all Race/Ethnic groups, the Index is lower for the population below federal poverty line versus the total population, except Asian or Pacific Islander, Non-Hispanic which also has the highest Index of 66.88 and White, Non-Hispanic having the lowest Index at 64.55.

In the region, all Race/Ethnic groups scored above average on Environmental Health Index and all groups scored higher than those in the jurisdiction. The White, Non-Hispanic population has the highest Index for the total population at 68.66. The Asian or Pacific Islander, Non-Hispanic has the lowest Index for the total population at 66.28. For all Race/Ethnic groups, the Index is lower for the population below federal poverty line versus the total population, except Asian or Pacific Islander, Non-Hispanic which also has the highest Index of 66.91 and Black, Non-Hispanic having the lowest Index at 64.83.

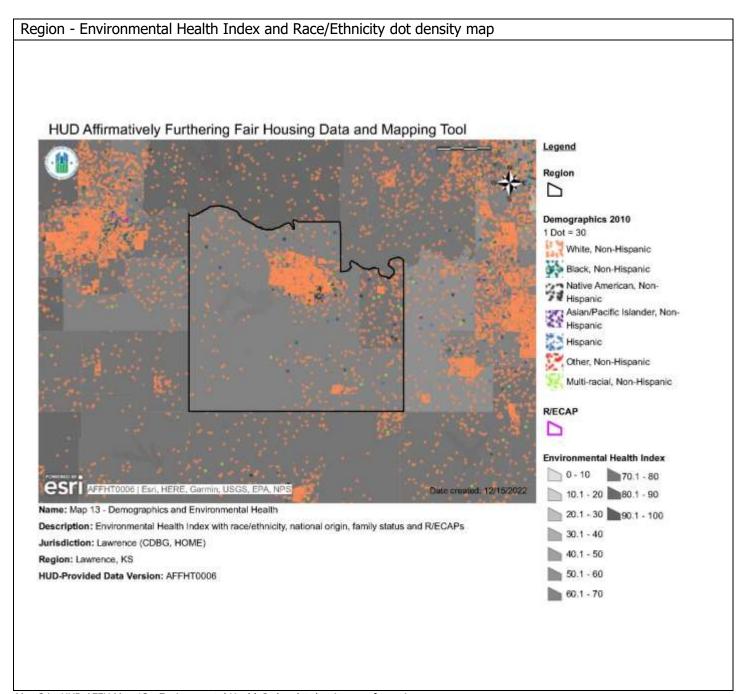
ii. For the protected groups HUD has provided data, describe how disparities in access to environmentally healthy neighborhoods relate to residential living patterns in the jurisdiction and region.

The maps provided by HUD show residency patterns of racial/ethnic and families with children. The Environmental Health Index shows shading at the neighborhood (census tract) level indicating levels of exposure to environmental health hazards. Darker shading (i.e. a higher value on the index) in a tract indicates a greater neighborhood environmental quality (i.e., lower exposure rates to harmful toxins). Lighter shading in a tract indicates a lower (worse) value on the Index and thus higher exposure rates to harmful toxins.

Environmental Health Index and Race/Ethnicity



Map 33 - HUD AFFH Map 13 - Environmental Health Index dot density map for jurisdiction



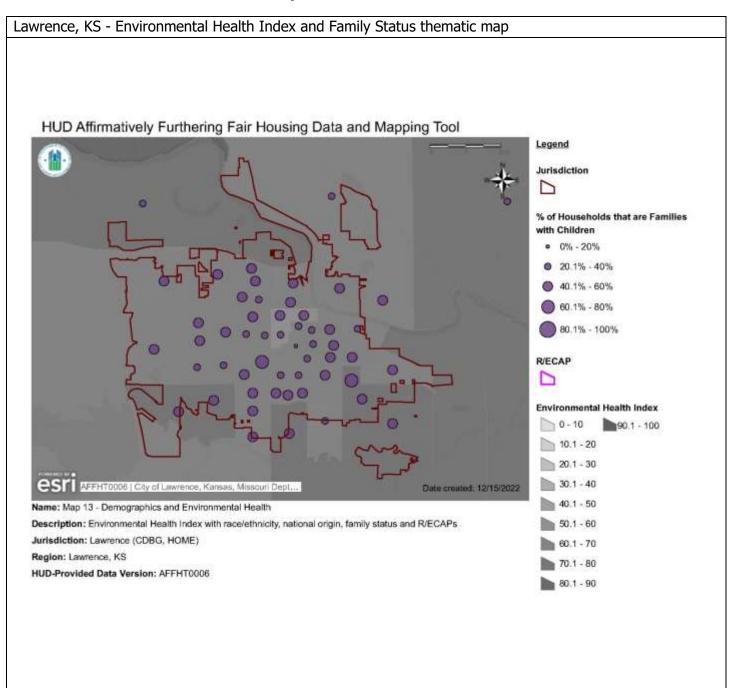
Map 34 - HUD AFFH Map 13 - Environmental Health Index dot density map for region

Table 33 provides the Environmental Health Index by race/ethnicity for both Lawrence and the region. Map 33 displays an Environmental Health Index dot density map for Lawrence showing all races/ethnicity together. Map 34 displays an Environmental Health Index dot density map for the region showing all races/ethnicity together.

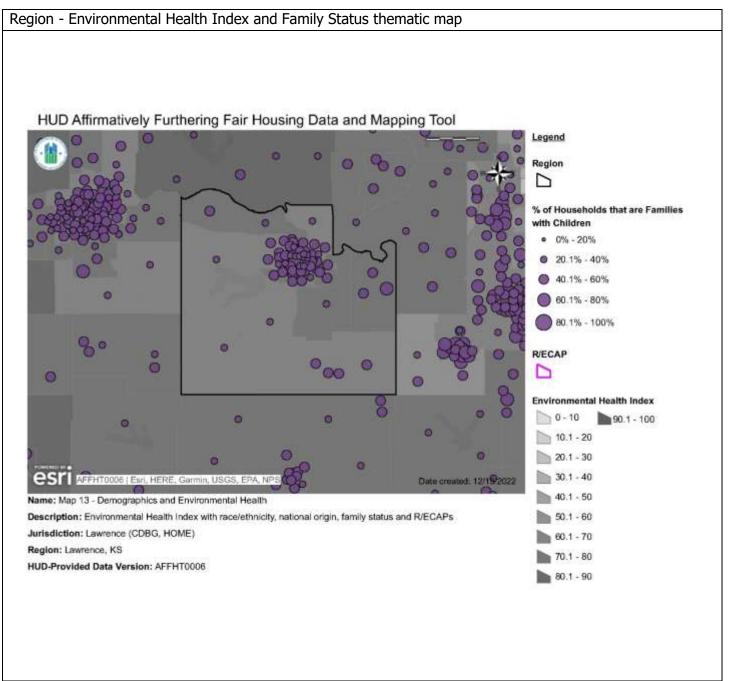
In Lawrence, the darker shaded tracts that indicate a greater neighborhood environmental quality are located in the Southwest, Southcentral, and Southeast areas. The lighter shaded tracts that indicate a higher exposure rate to harmful toxins are located in the Central areas.

In the region, the darker shaded tracts that indicate a greater neighborhood environmental quality are located in the East area.

Environmental Health Index and Family Status



Map 35 - HUD AFFH Map 13 - Environmental Health Index thematic map for jurisdiction



Map 36 - HUD AFFH Map 13 - Environmental Health Index thematic map for region

Map 35 displays an Environmental Health Index thematic map for Lawrence showing the percent of households that are families with children.

In Lawrence, the darker shaded tracts that indicate a greater neighborhood environmental quality are located in the Southwest, Southcentral, and Southeast areas. The lighter shaded tracts that indicate a higher exposure rate to harmful toxins are located in the Central area.

Map 36 displays an Environmental Health Index thematic map for the region showing the percent of households that are families with children.

In the region, the darker shaded tracts that indicate a greater neighborhood environmental quality are located in the Northwest, Central, and East areas.

iv. Disproportionate Housing Needs

1. Analysis

a. Which protected class groups (by race/ethnicity and familial status) experience higher rates of housing problems (cost burden, overcrowding, or substandard housing) when compared to other groups for the jurisdiction and region? Which groups also experience higher rates of severe housing cost burdens when compared to other groups?

Table 324 - HUD AFFH Table 9

HUD Table 9 - Demographics of						
Households with Disproportionate						
Housing Needs	(Lawrence, KS) Jurisdiction (Lawrence, KS) Region				gion	
Households experiencing any of 4	# with	#	% with	# with	#	% with
housing problems	problems	households	problems	problems	households	problems
Race/Ethnicity						
White, Non-Hispanic	10,185	29,175	34.91%	12,365	37,290	33.16%
Black, Non-Hispanic	800	1,555	51.45%	810	1,625	49.85%
Hispanic	720	1,575	45.71%	754	1,709	44.12%
Asian or Pacific Islander, Non-Hispanic	755	1,645	45.90%	795	1,714	46.38%
Native American, Non-Hispanic	155	610	25.41%	189	709	26.66%
Other, Non-Hispanic	400	930	43.01%	469	1,174	39.95%
Total	13,010	<i>35,485</i>	36.66%	15,370	44,215	<i>34.76%</i>
Household Type and Size						
Family households, <5 people	3,285	15,835	20.75%	4,400	21,569	20.40%
Family households, 5+ people	470	1,650	28.48%	755	2,390	31.59%
Non-family households	9,250	17,985	51.43%	10,210	20,245	50.43%

(Source: CHAS 2012-2016); All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Table 34 provides demographics of households experiencing any of four housing problems by race/ethnicity in both Lawrence and the region.

As defined by HUD, there are four housing problems. A household is said to have a housing problem if they have any 1 or more of the following problems:

- 1. Housing unit lacks complete kitchen facilities;
- 2. Housing unit lacks complete plumbing facilities;
- 3. Household is overcrowded, meaning there is more than 1 person per room; or
- 4. Household is cost burdened, spending more than 30 percent of monthly income on housing costs.

In Lawrence, the total percentage of households experiencing any of 4 housing problems is 36.66 percent. The Black, Non-Hispanic population has the highest rate at 51.45 percent, with the Native American, Non-Hispanic having the lowest rate at 25.41 percent. Household size and type also affect how likely it is a family faces housing problems. Non-family households experience housing problems at a rate of 51.43 percent. Family households with fewer than five people experience housing problems at the lowest rate of 20.75 percent.

In the region, the total percentage of households experiencing any of 4 housing problems is 34.76 percent, which is lower than the jurisdiction. The Black, Non-Hispanic population has the highest rate at 49.85 percent, with the Native American, Non-Hispanic having the lowest rate at 26.66 percent. Household size and type also affect how likely it is a family faces housing problems. Non-family households experience

housing problems at a rate of 50.43 percent. Family households with fewer than five people experience housing problems at the lowest rate of 20.40 percent.

Table 335 - HUD AFFH Table 9

HUD Table 9 – Demographics of Households with Disproportionate						
Housing Needs	(Law	rence, KS) Ju	ırisdiction	(Lawrence, KS) Region		
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	5,850	29,175	20.05%	7,005	37,290	18.79%
Black, Non-Hispanic	415	1,555	26.69%	415	1,625	25.54%
Hispanic	440	1,575	27.94%	459	1,709	26.86%
Asian or Pacific Islander, Non-Hispanic	555	1,645	33.74%	590	1,714	34.42%
Native American, Non-Hispanic	70	610	11.48%	100	709	14.10%
Other, Non-Hispanic	260	930	27.96%	264	1,174	22.49%
Total	7,580	<i>35,485</i>	21.36%	8,820	44,215	19.95%

(Source: CHAS); All % represent a share of the total population within the jurisdiction or region.

Table 35 provides demographics for housing experiencing any of four *severe* housing problems by race/ethnicity for both Lawrence and the region.

HUD also identifies four severe housing problems:

- 1. Housing unit lacks complete kitchen facilities
- 2. Housing unit lacks complete plumbing facilities
- 3. Household is severely overcrowded, meaning there are more than 1.5 people per room
- 4. Household is severely cost burdened, spending more than 50 percent of monthly income on housing costs

In Lawrence, the total percentage of households experiencing any of 4 *severe* housing problems is 21.36 percent. The Asian or Pacific Islander, Non-Hispanic population has the highest rate at 33.74 percent, with the Native American, Non-Hispanic having the lowest rate at 11.48 percent.

In the region, the total percentage of households experiencing any of 4 *severe* housing problems is 19.95 percent, which is lower than the jurisdiction. The Asian or Pacific Islander, Non-Hispanic population has the highest rate at 34.42 percent, with the Native American, Non-Hispanic having the lowest rate at 14.10 percent.

Table 346 - HUD AFFH Table 10

TADIE 346 - MUD AFFM TADIE 10							
HUD Table 10 — Demographics of							
Households with Severe Housing Cost							
Burden	(Lawrer	nce, KS) Juris	sdiction	(Lawrence, KS) Region			
	# with	#	% with	# with	#	% with	
	severe cost	households	severe cost	severe cost	households	severe cost	
Race/Ethnicity	burden	Householus	burden	burden	Households	burden	
White, Non-Hispanic	5,500	29,175	18.85%	6,490	37,290	17.40%	
Black, Non-Hispanic	395	1,555	25.40%	395	1,625	24.31%	
Hispanic	245	1,575	15.56%	260	1,709	15.21%	
Asian or Pacific Islander, Non-Hispanic	440	1,645	26.75%	475	1,714	27.71%	
Native American, Non-Hispanic	65	610	10.66%	65	709	9.17%	
Other, Non-Hispanic	160	930	17.20%	164	1,174	13.97%	
Total	6,805	<i>35,485</i>	19.18%	7,849	44,215	17.75%	
Household Type and Size							
Family households, <5 people	1,495	15,835	9.44%	1,939	21,569	8.99%	
Family households, 5+ people	84	1,650	5.09%	153	2,390	6.40%	
Non-family households	5,230	17,985	29.08%	5,754	20,245	28.42%	

(Source: CHAS); Severe housing cost burden is defined as greater than 50% of income; All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households; the # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.

Table 36 provides demographics of households with severe housing cost burden by race/ethnicity in both Lawrence and the region.

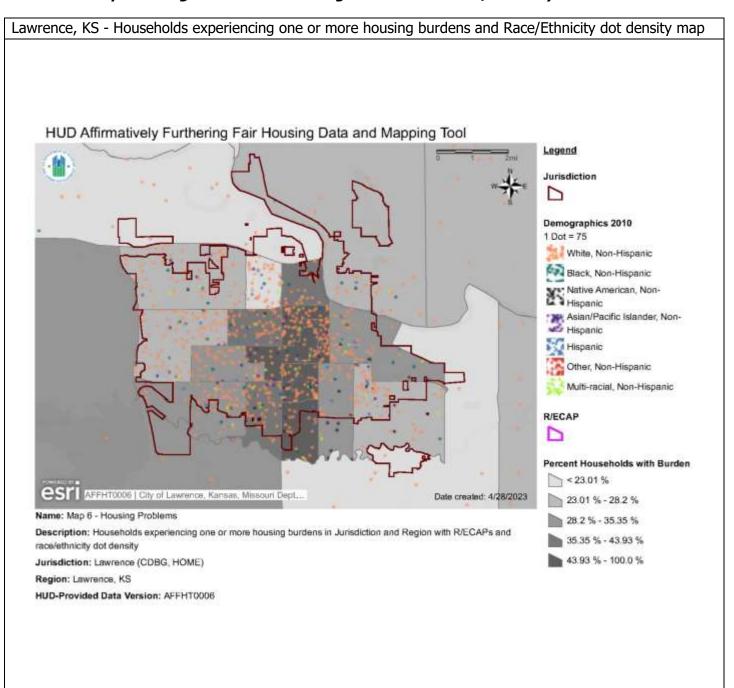
In Lawrence, the total percentage of households experiencing *severe* housing cost burden is 19.18 percent. The Asian or Pacific Islander, Non-Hispanic has the highest rate at 26.75 percent, with the Native American, Non-Hispanic having the lowest rate at 10.66 percent. Non-family households have the highest rate in Household Type and Size at 29.08 percent. A family household with five or more people is the lowest rate at 5.09 percent.

In the Region, the total percentage of households experiencing *severe* housing cost burden is 17.75 percent, which is lower than the jurisdiction. The Asian or Pacific Islander, Non-Hispanic has the highest rate at 27.71 percent, with the Native American, Non-Hispanic having the lowest rate at 9.17 percent. Non-family households have the highest rate in Household Type and Size at 28.42 percent. A family household with five or more people is the lowest at 6.40 percent.

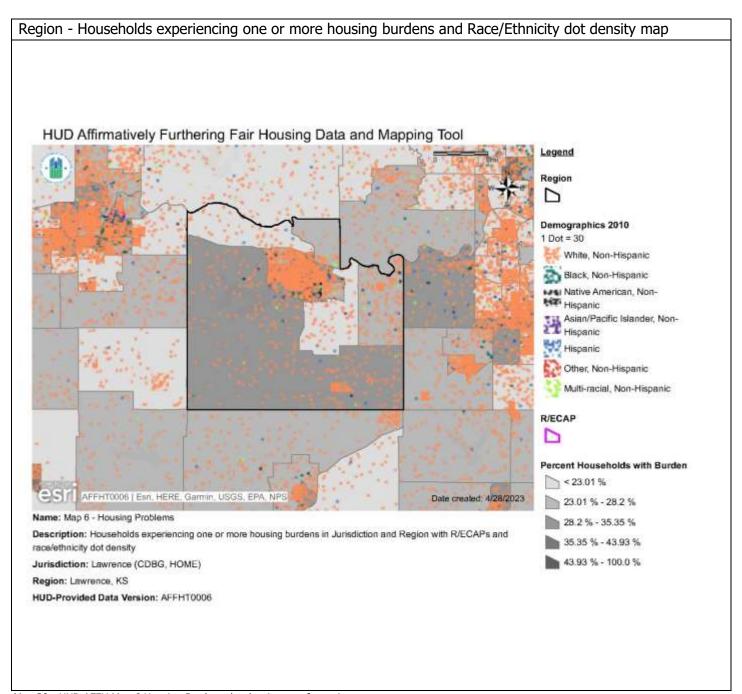
b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?

The maps provided by HUD show residential living patterns for persons by race/ethnicity, national origin, and families with children overlaid on shading indicating the percentage of households experiencing one or more housing problems in a particular census tract. Darker shading indicates a higher prevalence of such problems.

Households experiencing one or more housing burdens and Race/Ethnicity



Map 37 - HUD AFFH Map 6 Housing Burdens dot density map for jurisdiction



Map 38 - HUD AFFH Map 6 Housing Burdens dot density map for region

Map 37 displays a households experiencing one or more housing burdens dot density map for Lawrence showing all races/ethnicity together. Map 38 displays a households experiencing one or more housing burdens dot density map for the region showing all races/ethnicity together.

In Lawrence, the darker shaded tracts that indicate a higher prevalence of one or more housing burdens are located in the Central area around The University of Kansas and the Southcentral area. The lighter shaded tracts that indicate a lower prevalence of one or more housing burdens are located in the Northwest and West areas. In the region, the lighter shaded tracts that indicate a lower prevalence of one or more housing burdens are located in the Central and Northwest areas.

c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing for the jurisdiction and region.

Table 357 - HUD AFFH Table 11

HUD Table 11 – Publicly Supported Housing by		(Lawrence, KS) Jurisdiction								
Program Category: Units by Number of Bedrooms and Number of Children	0-1 E	eholds in Bedroom Jnits	Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children			
Housing Type	#	%	#	%	#	%	#	%		
Public Housing	184	51.54%	82	22.97%	91	25.49%	131	36.69%		
Project-Based Section 8	249	89.89%	18	6.50%	0	0.00%	1	0.36%		
Other Multifamily	0	0.00%	0	0.00%	0	0.00%	N/a	N/a		
HCV Program	210	30.38%	272	39.28%	210	30.35%	222	32.06%		

(Source: Inventory Management System (IMS)/PIH Information Center (PIC), 2019; Tenant Rental Assistance Certification System (TRACS), 2019; Low Income Housing Tax Credit (LIHTC) database, 2017; Decennial Census, 2010; Comprehensive Housing Affordability Strategy (CHAS), 2012-2016)

Table 37 provides data on publicly supported housing by program category: units by number of bedrooms and number of children.

51.54 percent of Public Housing in Lawrence is comprised of units with 0-1 bedrooms. There are 131 households with children in Public Housing, but only 82 units with 2 bedrooms and 91 units with 3+ bedrooms.

Project-Based Section 8 housing has significantly more units with 0-1 bedrooms compared to units with 2 bedrooms or 3+ bedrooms. There is 1 household with children in Project-Based Section 8 housing, and 0 units with 3+ bedrooms.

HCV Program is fairly evenly distributed by number of bedrooms. The largest percentage (39.28 percent) of HCV are used in units with 2 bedrooms, while there are 32.06 percent of households with children.

d. Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.

Table 368 - HUD AFFH Table 16

HUD Table 16 – Homeownership and	(La	(Lawrence, KS) Jurisdiction				(Lawrence, KS) Region			
Rental Rates by Race/Ethnicity	Home	Homeowners Renters		Home	owners	Renters			
Race/Ethnicity	#	%	#	%	#	%	#	%	
White, Non-Hispanic	14,515	89.90%	14,660	75.80%	20,595	90.71%	16,695	77.62%	
Black, Non-Hispanic	340	2.11%	1,210	6.26%	400	1.76%	1,225	5.70%	
Hispanic	445	2.76%	1,135	5.87%	535	2.36%	1,175	5.46%	
Asian or Pacific Islander, Non-Hispanic	435	2.69%	1,205	6.23%	505	2.22%	1,205	5.60%	
Native American, Non-Hispanic	190	1.18%	420	2.17%	285	1.26%	420	1.95%	
Other, Non-Hispanic	220	1.36%	710	3.67%	390	1.72%	785	3.65%	
Total Household Units	16,145	-	19,340	-	22,705	-	21,510	-	

(Source: CHAS 2011-2015); Data presented are numbers of households, not individuals

Table 38 provides demographics on homeownership and rental rates by race/ethnicity in both Lawrence and the region.

In Lawrence, 89.90 percent of homeowner households are owned by the White, Non-Hispanic population, compared to 10.10 percent of Non-White homeowner households. White, Non-Hispanic renters make up 75.80 percent of the total rental households. Non-White populations are disproportionately renters over homeowners.

In the region, 90.71 percent of homeowner households are owned by the White, Non-Hispanic population, compared to 9.32 percent of Non-White homeowner households. White, Non-Hispanic renters make up 77.62 percent of the total rental households. Non-White population are also disproportionately renters over homeowners.

C. Disability and Access Analysis

- 1. Population Profile
- a. How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?

Table 39 - HUD AFFH Table 13

HUD Table 13 – Disability by Type	(Lawrence, KS	6) Jurisdiction	(Lawrence, KS) Region	
Disability Type	#	%	#	%
Hearing difficulty	2,147	2.27%	3,179	2.68%
Vision difficulty	1,499	1.58%	2,031	1.71%
Cognitive difficulty	5,283	5.58%	6,436	5.42%
Ambulatory difficulty	3,713	3.92%	4,888	4.12%
Self-care difficulty	1,325	1.40%	1,986	1.67%
Independent living difficulty	3,132	3.31%	4,139	3.49%

(Source: ACS 2021 5-Year Estimates); All % represent a share of the total population within the jurisdiction or region

Table 39 provides demographics by individuals with disabilities by disability type for both Lawrence and the region. In Lawrence, cognitive difficulty is the most prevalent disability type at 5.58 percent of the population. In the region, cognitive difficulty is also the most prevalent disability type at 4.36 percent of the population.

Table 40 - HUD AFFH Table 14

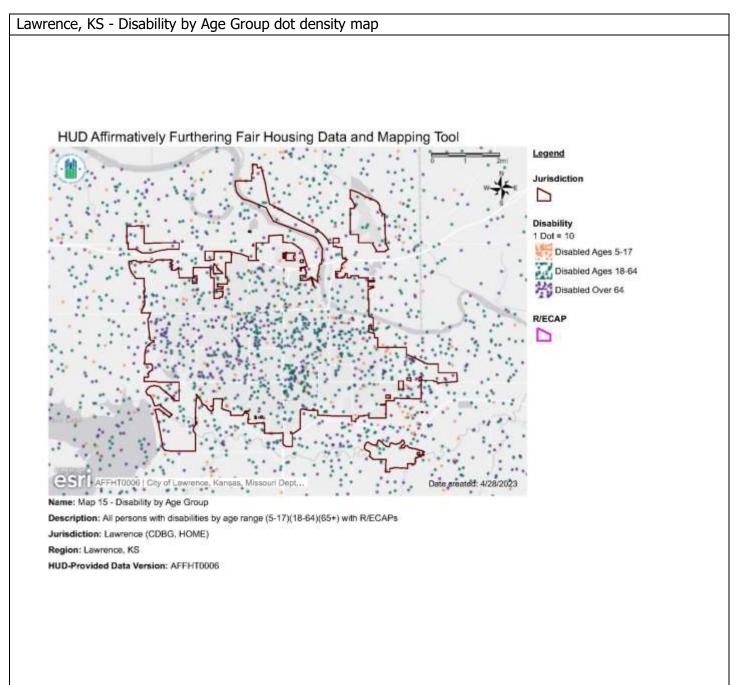
HUD Table 14 - Disability by Age Group	(Lawrence, KS) Jurisdiction		(Lawrence, KS) Region	
Age of People with Disabilities	#	%	#	%
age 5-17 with Disabilities	881	0.93%	1,158	0.98%
age 18-64 with Disabilities	6,074	6.41%	7,494	6.31%
age 65+ with Disabilities	2,978	3.14%	4,162	3.51%

(Source: ACS 2021 5-Year Estimates); All % represent a share of the total population within the jurisdiction or region

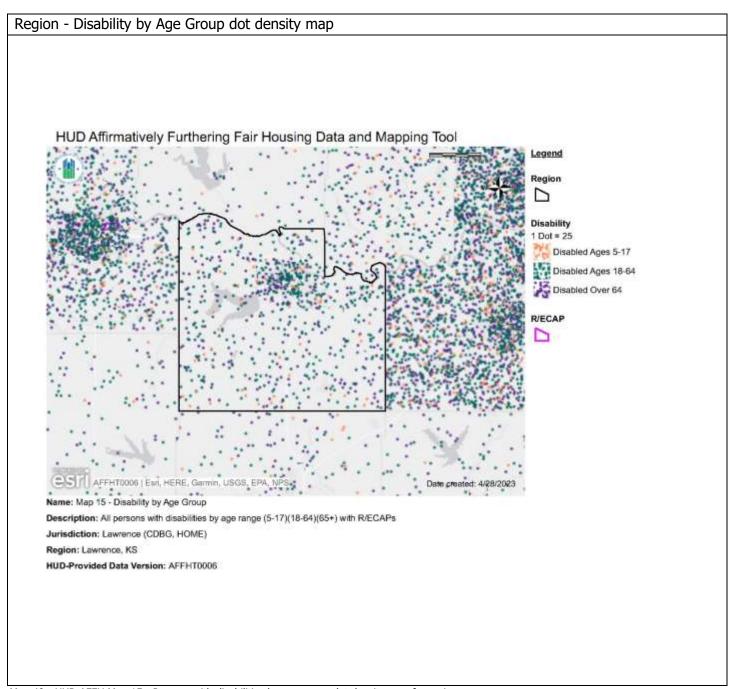
Table 40 provides demographics by individuals with disabilities by age group for both Lawrence and the region. In Lawrence, the largest percentage of the population with a disability occurs in the age range of 18-64 at 6.41 percent. The second largest percentage occurs in the 65+ age range at 3.14 percent. In the region, the largest percentage of the population with a disability also occurs in the age range of 18-64 at 6.31 percent. The second largest percentage again occurs in the 65+ age range at 3.51 percent.

The maps provided by HUD depict a dot density distribution of disability by age group and a dot density distribution by disability type (hearing, vision, cognition, ambulatory, self-care, independent living) for the jurisdiction and region.

Disability by Age Group



Map 39 - HUD AFFH Map 15 - Persons with disabilities by age range dot density map for jurisdiction



Map 40 - HUD AFFH Map 15 - Persons with disabilities by age range dot density map for region

Map 39 displays a persons with disabilities dot density map for Lawrence showing persons by age group. In Lawrence, the concentration of persons with a disability increases in the Central areas around The University of Kansas and in the Northcentral, Southcentral, and East, which corresponds to the areas with a higher number of affordable and renter units.

Map 40 displays a persons with disabilities dot density map for the region showing persons by age group. In the region, the concentration of persons with a disability increases in the Southeast area around the community of Baldwin City, in the East around the community of Eudora, and in the Northcentral area.

a. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing in the jurisdiction and region?

Table 41 - HUD AFFH Table 15

HUD Table 15 - Disability by	(Lawrence, KS) Jurisdiction		(Lawrence, KS) Region	
Publicly Supported Housing	People with a Disability		People with a Disability	
Program Category	# %		%	%
Public Housing	72	20.12%	72	20.12%
Project-Based Section 8	158	57.18%	158	57.18%
Other Multifamily	N/a	N/a	N/a	N/a
HCV Program	225	32.54%	241	31.85%

(Source: Inventory Management System (IMS)/PIH Information Center (PIC), 2019; Tenant Rental Assistance Certification System (TRACS), 2019; Low Income Housing Tax Credit (LIHTC) database, 2017; Decennial Census, 2010; Comprehensive Housing Affordability Strategy (CHAS), 2012-2016); the definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.

Table 41 provides data on disability by publicly supported housing program category.

In Lawrence and the region, persons with a disability are represented in each of the three categories of publicly supported housing (Public Housing, Project-Based Section 8, and HCV Program) for which there is data. Public Housing has 20.12 percent of the residents having a disability. Project-Based Section 8 has 57.18 percent of the residents having a disability. The HCV Program in the jurisdiction has 32.54 percent of the residents having a disability and the region has 31.85 percent of the HCV Program residents having a disability.

a. Describe the range of options for persons with disabilities to access affordable housing and supportive services in the jurisdiction and region.

Table 42 - HUD AFFH Table 13

HUD Table 13 – Disability by Type	(Lawrence, KS) Jurisdiction		(Lawrence, KS) Region	
Disability Type	#	%	#	%
Hearing difficulty	2,147	2.27%	3,179	2.68%
Vision difficulty	1,499	1.58%	2,031	1.71%
Cognitive difficulty	5,283	5.58%	6,436	5.42%
Ambulatory difficulty	3,713	3.92%	4,888	4.12%
Self-care difficulty	1,325	1.40%	1,986	1.67%
Independent living difficulty	3,132	3.31%	4,139	3.49%

(Source: ACS); All % represent a share of the total population within the jurisdiction or region

Table 42 provides demographics by individuals with disabilities by disability type for both Lawrence and the region.

Table 43 - HUD AFFH Table 15

HUD Table 15 – Disability by Publicly Supported Housing Program Category	(Lawrence, KS) Jurisdiction People with a Disability		(Lawrence, KS) Region People with a Disability	
	#	%	%	%
Public Housing	72	20.12%	72	20.12%
Project-Based Section 8	158	57.18%	158	57.18%
Other Multifamily	N/a	N/a	N/a	N/a
HCV Program	225	32.54%	241	31.85%

(Source: CHAS); the definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.

Table 43 provides data on disability by publicly supported housing program category.

In Lawrence, there are 17,099 persons with a disability, with 455 (2.66 percent) living in publicly supported housing.

In the region, there are 22,659 persons with a disability, with 471 (2.08 percent) living in publicly supported housing.

D. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

1. List and summarize any of the following that have not been resolved:

A charge or letter of finding from HUD concerning a violation of a civil rights-related law;

None

 A cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law;

None

 Any voluntary compliance agreements, conciliation agreements, or settlement agreements entered into with HUD or the Department of Justice.

None

A letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a
pattern or practice or systemic violation of a fair housing or civil rights law.

None

 A claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing;

None

• A pending administrative complaints or lawsuits against the locality alleging fair housing violations or discrimination.

None

2. Describe any state or local fair housing laws. What characteristics are protected under each law?

The City of Lawrence's fair housing law is substantially equivalent to the Federal Fair Housing Act of 1968, as amended, but is more inclusive. The City's fair housing law prohibits discrimination on the basis of sexual orientation and gender identity, in addition to the protected classes set forth in the federal law. As of June 1, 2023, the City's fair housing law includes extended housing protections against discrimination based on source of income and immigration status. The City's law assures equal opportunity in housing, without distinction on account of race, sex, religion, color, national origin, age, ancestry, familial status, sexual orientation, disability, gender identity, source of income, or immigration status. The ordinance declares the City's policy against housing discrimination, creates the Lawrence Human Relations

Commission and the Human Relations Department Director, and establishes their powers and duties. The ordinance describes the procedures that govern the filing, investigation and resolution of discrimination complaints including conciliation, public hearing, or election of civil action. The ordinance makes it unlawful for any person to engage in an unlawful housing/real property practice, to deny reasonable accommodations or reasonable modifications, or to retaliate against any person exercising any right granted or protected by the law.

The State of Kansas fair housing law assures equal opportunities in housing without distinction on account of race, religion, color, sex, disability, familial status, national origin or ancestry. The statute declares the State's policy against housing discrimination creates the Kansas Human Relations Commission and establishes its powers and duties. The statute describes the procedures that govern the filing, investigation and resolution of discrimination complaints and makes it unlawful for any person to engage in an unlawful housing/real property practice, to deny reasonable accommodations or reasonable modifications, or to retaliate against any person exercising any right granted or protected by the law. The City's law is also more inclusive than the laws of the State of Kansas.

Identify any local and regional agencies and organizations that provide fair housing information, outreach and enforcement, including their capacity and the resources available to them.

The United States Department of Housing and Urban Development located at 400 State Avenue, Room 200, Kansas City, KS 66101, the Kansas Human Rights Commission, located at 900 SW Jackson, Suite 568-S, Topeka, Kansas, 66612 and the Lawrence Human Relations Commission, located at 1006 New Hampshire, Lawrence, Kansas 66044, are all local agencies that provide fair housing information, outreach and enforcement. HUD's resources are appropriated by Congress, and the Kansas Human Rights Commission's budget is set by the Kansas Legislature.

The Lawrence Human Relations Division has provided brochures to the following list of local agencies that explain the City's fair housing laws:

- Tenants to Homeowners, Inc. (not-forprofit)
- Independence, Inc. (not-for-profit)
- Housing & Credit Counseling, Inc. (notfor-profit)
- United Way (not-for-profit)
- Ballard Community Services (not-forprofit)
- Douglas County Senior Resource Center (not-for-profit)
- KU Office of Multicultural Affairs
- Haskell Indian Nations University
- Lawrence Workforce Center (not-forprofit)
- KU Institutional Office of Civil Rights and Title IV
- Cottonwood (not-for-profit)
- Legal Services for Students (KU)
- Just Food
- Lawrence Municipal Court
- Lawrence Public Library
- Haus of McCoy
- Family Promise of Lawrence

- Salvation Army (not-for-profit)
- Heartland Community Health Center
- Downtown Lawrence, Inc. (not-forprofit)
- Bert Nash (not-for-profit)
- Lawrence Douglas County Public Health (not-for-profit)
- Lawrence Community Shelter (not-forprofit)
- LINK First Christian Church (not-forprofit)
- Catholic Charities (not-for-profit)
- Student Involvement & Leadership Center
- Sexual Trauma & Abuse Care Center
- Lawrence Board of Realtors (not-forprofit)
- The Center for Sexuality & Gender Diversity
- Lawrence Douglas County Housing Authority (not-for-profit)

The City's fair housing activities are funded in part by a Fair Housing Assistance Program (FHAP) grant from the U.S. Department of Housing and Urban Development. The City's general fund also funds our local fair housing activities.

4. Additional Information

a. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.

The City of Lawrence is a Fair Housing Enforcement Agency (FHAP) and has an existing contract with HUD to provide fair housing enforcement within the jurisdiction of the City of Lawrence. The City receives an annual grant from HUD to assist with fair housing enforcement and outreach. The average size of the grant based upon the last five years is \$24,112.00. The City of Lawrence also has an appointed advisory and enforcement board – The Lawrence Human Relations Commission. This nine member body also assists with fair housing enforcement, investigation, and outreach.

The City of Lawrence Human Relations Division employs investigators to enforce our fair housing law. Currently, one investigator is trained to process and investigate complaints. City staff also perform fair housing outreach and educational activities.

b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.

The City of Lawrence in conjunction with the Human Relations Commission annually provides outreach activities to promote fair housing outcomes, and awareness. Activities include: posting information on the City website, use of city social media accounts to highlight fair housing information, direct mailers to 33,000 households in Lawrence, sponsoring seminars and educational lectures on fair housing law, partnering with other entities to promote an understanding of fair housing laws, and displaying our outreach materials at community events and the offices of local organizations. Recent activities have included the following:

- April 2022-Celebration of Fair Housing Month by collaborating with the Lawrence Public Library on several community events, including the Dance Party for Littles program and the Early Childhood Resource Fair. The City donated over one hundred children's books on diversity and inclusion to the Library and handed them out at these events along with brochures, postcards, and flyers on fair housing laws.
- April 2022-Fair Housing Displays were set up in at several locations in the community including City Hall, Watkins Museum, Lawrence Municipal Court, and the Lawrence Public Library. These displays contained informative posters, postcards, swag and brochures containing information on fair housing laws.
- June 2022-The City partnered with Just Food and informational materials on fair housing laws were supplied within Just Food's main grocery area, and included in all deliveries and pickups made through the "Just Basic" program designed to assist local families with needs that governmental services do not often cover such as diapers, sanitary napkins and tampons, adult diapers, and other essential needs. Over 180 deliveries were made containing fair housing information.
- September 2022-City staff developed new housing rights pamphlets and delivered over 300 of these pamphlets to local agencies and non-profits.
- October 2022-The City partnered with the Ballard Center and donated books on diversity and inclusion to its preschool program. The Ballard Center provided the City's housing rights pamphlets

to all individuals who accessed their rent and utility assistance, and preschool programs. Information was provided to over 200 families.

- February 2023-The City passed Ordinance No. 9960 to amend the City Code to include housing protections prohibiting discrimination based on an individual's source of income or immigration status. The new law is effective as of June 1, 2023.
- April 2023-The City updated its housing pamphlets to include information on the new local housing law protections, established by Ordinance 9960. Displays to promote awareness of the new law and also to celebrate Fair Housing Month were set up in City Hall before each City Commission meeting.
- April & May 2023-Community engagement education forums were held at several locations to
 discuss the new local housing laws established by Ordinance No. 9960. A panel consisting of City
 staff, the Chair of the Human Relations Commission, and staff from Lawrence Douglas County
 Housing Authority provided background on fair housing laws, both federally and locally and
 addressed the recent changes to local law. An open Q&A session followed the panel discussion.
- Throughout 2022-2023-Human Relations Commissioners and City staff tabled local events providing
 information on the Human Relations Commission and Fair Housing laws. Additionally, social media
 posts were made on the City's social media pages promoting the work of the Human Relations
 Commission and reminding the community of the existence of fair housing laws and how to access
 assistance when needed.

5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors.

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the lack of fair housing enforcement, outreach capacity, and resources and the severity of fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

• Lack of resources for fair housing agencies and organizations

The identified contributing factor is applicable to both the City of Lawrence and the Lawrence-Douglas County Housing Authority.

We are not aware that local, state, or regional agencies lack fair housing enforcement, outreach capacity, and resources. Agencies in the region, including the City, have had to operate differently to respond to budget constraints. A lack of resources for fair housing agencies and organizations may contribute to any perceived deficiencies in fair housing enforcement and outreach activities.

Fair Housing Goals and Priorities

AFH Goal	Fair Housing Issues	Con Plan Priority Need	Associated Con Plan Goals
Increase affordable housing options	Segregation/Integration; Disparities in Access to Opportunity; Disproportionate Housing Needs; Disability and Access	Affordable Housing; Equity and Inclusion; Supportive Housing	Increase affordable housing stock; Maintain current affordable housing stock; Provide homebuyer assistance; Public facility improvements; Tenant-Based Rental Assistance (TBRA); Delivery of public services; Administration; Affirmatively Furthering Fair Housing

Discussion: A common thread across this assessment is the lack of affordable housing in the jurisdiction. The City currently has several sources of funding for the development of affordable housing. The Affordable Housing Advisory Board will recommend allocations from the Affordable Housing Trust Fund for the development of affordable units. HOME Investment Partnership program funds will be used yearly for the development of affordable, accessible units. Recommendations for new units will include a range of unit sizes and locations to increase dispersal of affordable housing throughout the community.

AFH Goal	Fair Housing Issues	Con Plan Priority Need	Associated Con Plan Goals
Explore additional revenue streams for funding the Affordable Housing Trust Fund	Segregation/Integration; Disparities in Access to Opportunity; Disproportionate Housing Needs; Disability and Access	Affordable Housing; Supportive Housing	Increase affordable housing stock; Maintain current affordable housing stock; Provide homebuyer assistance; Tenant-Based Rental Assistance (TBRA); Affirmatively Furthering Fair Housing

Discussion: Continue the work of the Affordable Housing Advisory Board to explore additional revenue streams for increasing affordable housing in the community.

AFH Goal	Fair Housing Issues	Con Plan Priority Need	Associated Con Plan Goals
Maintain existing affordable housing	Segregation/Integration; Disparities in Access to Opportunity; Disproportionate Housing Needs; Disability and Access	Affordable Housing; Equity and Inclusion	Maintain current affordable housing stock; Administration; Affirmatively Furthering Fair Housing

Discussion: The City will continue to administer funding to rehabilitate, improve energy efficiency, modify accessibility, and/or repair both low-income homeowner and rental housing. These improvements allow low-income households to remain in their housing and also improve the existing stock of affordable housing. These programs are marketed city wide to all eligible households.

AFH Goal	Fair Housing Issues	Con Plan Priority Need	Associated Con Plan Goals
Commission an updated housing needs market assessment	Segregation/Integration; Disparities in Access to Opportunity; Disproportionate Housing Needs; Publicly Supported Housing; Disability and Access	Affordable Housing; Equity and Inclusion; Supportive Housing; Systems; Emergency Shelter	Increase Affordable Housing Stock; Maintain current affordable housing stock; Provide homebuyer assistance; Tenant-Based Rental Assistance (TBRA); Administration; Affirmatively Furthering Fair Housing

Discussion: In order to accurately assess the housing needs in the community, an updated comprehensive housing needs market assessment must be conducted. By knowing the extent of the housing issues, funds can be appropriately allocated to address the identified areas of need. The last housing needs market assessment was conducted in 2018, but there have been significant changes in local housing issues and the market since that time.

AFH Goal	Fair Housing Issues	Con Plan Priority Need	Associated Con Plan Goals
Increase homeownership among low-income households and members of the protected classes	Segregation/Integration; Disparities in Access to Opportunity; Disproportionate Housing Needs; Disability and Access	Affordable Housing; Equity and Inclusion	Increase Affordable Housing Stock; Maintain current affordable housing stock; Provide homebuyer assistance; Administration; Affirmatively Furthering Fair Housing

Discussion: The jurisdiction and region have a relatively low homeownership rate, especially among certain racial and ethnic groups. Particularly, non-White households have lower homeownership rates than White households. HUD Table 16 shows that in the jurisdiction there are 16,145 homeowners, of those 89.90 percent are White, Non-Hispanic, 2.11 percent Black, Non- Hispanic, 2.76 percent Hispanic, 2.69 percent Asian or Pacific Islander, Non-Hispanic, 1.18 percent Native American, Non-Hispanic, and 1.36 percent Other, Non-Hispanic. Within the region there are 22,705 homeowners, 90.71 percent White, Non-Hispanic, 1.76 percent Black, Non-Hispanic, 2.36 percent Hispanic, 2.22 percent Asian or Pacific Islander, Non-Hispanic, 1.26 percent Native American, Non-Hispanic, and 1.72 percent Other, Non-Hispanic. Persons with physical disabilities looking to buy a home also face difficulty in finding a unit that is already accessible or easily modified. Increasing homeownership for protected classes not only helps these households build wealth and access opportunity, but it also relieves pressure from the rental market. The city will continue to assist low-income households achieve homeownership.

Appendix

Affirmatively Furthering Fair Housing Data and Mapping Tool

<u>AFFH Data and Mapping Tool</u>

AFFH Data and Mapping Tool Data Documentation

<u>AFFH Data Documentation</u>

2018 City of Lawrence Assessment of Fair Housing 2018 HUD Accepted AFH