

HOME-ARP

Allocation Plan

October 2023

Participating Jurisdiction:
The City of Lawrence, KS

Contact for questions and public comment:

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Introduction

As a part of the American Rescue Plan Act of 2021 (“ARP”), the Department of Housing and Urban Development (“HUD”) allocated \$4.925 billion in supplemental ARP funds through the HOME Investment Partnership Program (“HOME”) to support communities throughout the country to address homelessness. This newly created funding source is called the HOME-ARP program. Eligible recipients included the 651 states and local participating jurisdictions (“PJs”) that qualified for an annual HOME Program Allocation in FY 2021.

Lawrence, KS (“the City”) was awarded \$1,641,383 in HOME-ARP funds to assist the following populations:

- Homeless
- At-risk of homelessness
- Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, human trafficking
- Other populations where providing supportive services or assistance would prevent the family's homelessness or would serve those at greater risk of homelessness
- Veterans and families that include a veteran that meets one of the preceding criteria

HOME-ARP funds can be used towards funding the following eligible activities to reduce homelessness and increase housing stability across the country:

- Production or Preservation of Affordable Housing
- Tenant-Based Rental Assistance (TBRA)
- Supportive Services, including services defined at 24 CFR 578.53(e), homeless prevention services, and housing counseling
- Purchase and Development of Non-Congregate Shelter

All PJs eligible to receive HOME-ARP funding are required to submit a HOME-ARP Allocation Plan to HUD for review. The HOME-ARP Allocation Plan provides a description of how the PJ intends to utilize its funding on proposed activities, and how it will address the needs of qualifying populations. In accordance with [Section V](#) of the Final HOME-ARP Implementation Notice, PJs must:

- Consult with agencies and service providers whose clientele include the HOME-ARP qualifying populations to identify unmet needs and gaps in housing or service delivery systems
- Provide for and encourage citizen participation in the development of the HOME-ARP Allocation Plan

To complete a HOME-ARP Allocation Plan, a PJ must also:

- Conduct a needs assessment and gap analysis
- Describe proposed HOME-ARP activities
- Describe the PJs production housing goals
- Identify whether the PJ intends to give preferences to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project
- Identify if the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, and state its HOME-ARP refinancing guidelines (if applicable)
- Implement a public comment period of at least 15 calendar days
- Hold at least one public hearing during the development of the HOME-ARP Allocation Plan and before submission

Upon the culmination of the City’s consultation and public participation processes, along with the completion of its needs assessment and gap analysis, the City has prepared the following HOME-ARP Allocation Plan for review, consideration, and acceptance by HUD.

Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction’s geographic area, homeless and domestic violence service providers, veterans’ groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities, at a minimum. State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Summary of the consultation process:

Through a competitive solicitation process, the City awarded Virchow, Krause & Company, LLP (“VK”) a contract to complete HOME-ARP Allocation Plan consulting services on behalf of the City. The project scope included:

- Developing and facilitating a community engagement strategy across a broad range of community stakeholders, advocacy groups, residents, and City staff
- Completing a needs assessment and gap analysis
- Conducting community engagement and consultation among agencies, service providers, and the public
- Facilitating a public hearing among residents of the community
- Assessing housing needs and priorities given current market conditions and projected growth trends for qualifying populations
- Prioritizing identified needs for qualifying populations

- Identifying and describing proposed eligible HOME-ARP activities to be completed by the City
- Preparing the City’s HOME-ARP Allocation Plan

Prior to beginning the consultation process, VK facilitated meetings with the City to review the goals and objectives of conducting community and stakeholder outreach and engagement. During these meetings, it was determined that the Douglas County region of the Kansas Balance of State Continuum of Care (CoC), in addition to local public housing authorities (PHAs), community-based organizations (i.e. providers of various supportive services, veteran-based groups, domestic violence service providers, public/private agencies that address qualifying populations, etc.) would be consulted with to facilitate conversations focusing on unmet needs, gaps in affordable housing options and service delivery systems for the City’s most vulnerable citizens. Additionally, the City and VK identified engagement methods that would be used to engage agencies and residents which: included three virtual focus groups with agencies, one public hearing for residents, the distribution of an agency-focused Stakeholder Needs Assessment Survey, and the distribution of a Citizen Participation Survey in English and Spanish geared towards City residents.

To prepare for the execution of the stakeholder focus groups, agencies were invited to register via Microsoft Forms to attend any of the three virtual focus groups being offered to provide their input. Focus groups were scheduled across a one-week timeframe for the following dates and times:

- Focus Group 1: Friday, January 6, 2023, 10:00 A.M. CST – 11:30 A.M. CST
- Focus Group 2: Tuesday, January 10, 2023, 9:30 A.M. CST – 11:00 A.M. CST
- Focus Group 3: Wednesday, January 11, 2022, 2:00 P.M. CST – 3:30 P.M. CST

A total of 49 agencies were invited to participate in the virtual focus group sessions; 24 individuals representing 18 agencies participated in at least one focus group. During the focus groups, a variety of questions were asked to address the following topics:

- Populations most in need of assistance
- Gain a better understanding of qualifying populations
- Barriers to finding affordable housing and accessing supportive services
- Access to public transportation
- Coordinated entry process
- Greatest unmet needs and gaps in services among qualifying populations
- Potential project ideas that may be eligible under the HOME-ARP program

Participants were provided the opportunity to respond to open-ended questions throughout each session, which led to increased dialogue among the groups. Upon completion of the final focus group, agencies were also invited to complete an online Stakeholder Needs Assessment Survey, created in Microsoft Forms, which gave agencies an additional opportunity to provide

feedback, including those agencies that were unable to participate in a focus group. For additional reach, the Stakeholder Needs Assessment Survey was shared with stakeholder agencies that provide services to those that are homeless and at risk of homelessness and other HOME-ARP qualifying populations in Lawrence and Douglas County.

Summary of comments and recommendations received through the consultation process:

Responses from the stakeholder agencies identified the development and availability of affordable rental housing and, more specifically, permanent supportive housing, as the greatest priority in Lawrence and Douglas County. Focus group attendees mentioned a high need for 1 – 2-unit rental units, but also multiple bedroom options for families experiencing homelessness. Of note in discussion, out of the 14 college communities in the Midwest, Lawrence ranks second in housing prices and ranks 3rd (from the bottom) in per-capita income. Outside investment in luxury housing is driving prices up while limiting the number of affordable units available in the community. This is leading to fewer units available that accepts tenant based rental assistance (TBRA) and allowing landlords to deny applicants based on previous infractions and legal issues.

Non-congregate shelter was also noted to be of high need, as there is only one general shelter which is located in east Lawrence. Also of note is that the general shelter can be difficult to access because there is only one bus route to get there. Families find it difficult to find emergency shelter because of the lack of availability of multi-unit accommodations and what is currently available stays completely full.

Focus group attendees also discussed senior housing and the increasing need for more availability of units for this group of residents. Senior living facilities in Lawrence are no longer accepting new applicants planning to pay for services and housing with Medicare. A tenant legal representation pilot program is also needed to represent renters and help them navigate housing. Culturally relevant services should be offered to tenants throughout the housing process and by service providers.

Organizations consulted and summary of feedback

Organizations Consulted and Summary of Feedback			
Agency/Organization Consulted	Qualifying Population Served by Agency/Organization	Method of Consultation	Feedback
Kansas Department for Children and Families- Lawrence	Homeless Service Provider/Children & Youth Service Provider/Domestic Violence Service Provider	Virtual Meeting	Permanent supportive housing is of the highest need, specifically housing with 1 - 2-bedroom units. Many people who come in to receive specifically cash assistance are denied because they received the funding 10 years (example) ago. It would be helpful to have a pool of funding for these residents. There is only one major shelter for the general public and it's on the west side of the city next to the jail with only one bus route to get there. There are limited emergency shelter options for families or those fleeing domestic violence.
Tenants to Homeowners, Inc.	Fair Housing Agency	Virtual Meeting	The greatest need is for permanent supportive housing. Out of the 14 college communities in the Midwest, Lawrence ranks second in housing prices, only behind Boulder, and only ranks 3rd (from the bottom) in per-capita income. This has made it increasingly hard for people with low incomes to find decent housing.

<p>Douglas County Health, Housing, & Human Services</p>	<p>Government Agency/Homeless Service Provider</p>	<p>Virtual Meeting</p>	<p>Lawrence is currently experiencing the loss of the state Emergency Rental Assistance Program and it's providing difficulty for renters and service providers; rental properties are being purchased by large investment groups or property management companies that aren't based in Lawrence and aren't interested in working with community programs (TBRA, utility assistance, down payment assistance, etc.); Some landlords are requiring 3x the income of rent to be approved as a tenant, and that's not feasible for some clients. Catholic Charities is the only ESG agency in Lawrence and they primarily use the funding for rental assistance combined with case management to keep people housed or get people housed. Black and brown indigenous people experience homelessness at a higher rate than white, and women experience higher rates of homelessness than men; A tenant legal representation pilot program is needed and should be funded.</p>
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<p>Lawrence-Douglas County Housing Authority *CoC Organization*</p>	<p>Public Housing Agency/Veteran Service Provider</p>	<p>Virtual Meeting</p>	<p>There should be an increase in housing stock particularly for people that are experiencing homelessness. There is currently no transitional/permanent supportive housing in Lawrence. Funding could be appropriate to help drive forward plans to build transitional/supportive housing. Management and large landlord companies are not willing to allow tenants who have credit problems, criminal background history, income requirements, etc. Bert Nash and Tenants to Homeowners have properties for those that are homeless/need transitional housing. City and non-profits should have a goal to provide more housing. Non-congregate shelter and a family shelter are desperately in need. There is no shelter for families except for Family Promise (non-profit) and they are full. Housing First pilot project has been started- more case management is needed alongside more non-congregate shelter, thinks that this is how you start addressing chronic homelessness. Would not recommend putting any additional funding toward TBRA but thinks that it should be used to help purchase non-congregate shelter or production of affordable housing.</p>
<p>Indian Health Service</p>	<p>Heath Service Provider</p>	<p>Virtual Meeting</p>	<p>Sees a lot of families with nowhere to go, whether it's because of a loss of income/emergency rental assistance, landlords selling properties and giving people 30 days to get out and driving up rental costs, or they are just selling the property to make money; A lot of their clients come directly off the reservation looking for housing, but they have no rental history so they can't find anywhere to stay. Lawrence needs additional low-income housing but should also provide culturally relevant services to minorities.</p>
<p>Centro Hispano Resource Center of Lawrence</p>	<p>Children & Youth Service Provider</p>	<p>Virtual Meeting</p>	<p>No comment</p>

The Sexual Trauma & Abuse Care Center	Domestic Violence Service Provider	Virtual Meeting	52% of the homeless population in Lawrence are women, so a focus should be put on that population. There is no shelter in Lawrence for women or families. Lawrence needs additional non-congregate shelter and transitional housing.
United Way of Kaw Valley	Homeless Service Provider/ People with Disabilities Service Provider	Virtual Meeting	No comment
Ballard Center	Children & Youth Service Provider	Virtual Meeting	The best use of funding would be to build affordable housing – there just is not enough housing in Lawrence to meet the needs of citizens.
Lawrence Community Shelter (LCS) *CoC Organization*	Homeless Service Provider	Virtual Meeting	Huge need for medical respite care services – people come to their facility the day after surgery (example); they also have the need for hospice care at LCS – no hospice facility in Douglas County.
Family Promise of Lawrence *CoC Organization*	Domestic Violence Service Provider/ Children & Youth Service Provider	Virtual Meeting	Doubling-up is a constant problem in Lawrence – 80% of the families they have been serving over the past few years have been sheltering in non-shelters. Lawrence needs more non-congregate shelter and transitional housing options.
Kansas Holistic Defenders	Fair Housing Agency/ Civil Rights Service Provider	Virtual Meeting	No comment
Independence Inc.	Fair Housing Agency/ Persons with Disabilities Service Provider	Virtual Meeting	Sees a lot of individuals come in that have vouchers but can't find landlords that accept vouchers. Rents have also gotten too high for what people can afford. Also sees a lot of people with disabilities or elderly that can't find appropriate housing. Typically gets involved when someone with a disability needs a change to their home for accessibility. Lawrence needs more housing in general, but housing needs to be accessible.
Big Brothers Big Sisters of Douglas County	Children & Youth Service Provider	Virtual Meeting	No comment

<p>Bert Nash Community Mental Health Center *CoC Organization*</p>	<p>Health Service Provider/ Homeless Service Provider</p>	<p>Virtual Meeting</p>	<p>Challenge being faced is that there is a large variety of housing needs (ex. low income, intellectual or physical disability, etc.); some of the most challenging cases for individuals are for the elderly population who have extremely low-income and no longer able to live on their own without support of assisted living; people who have significant histories that indicate they struggle with living on their own or maintaining their own housing. The need for supportive housing is high. Assisted living facilities are extremely expensive - \$4,000/month and will not bring in new Medicare residents. Community has the capacity to develop property and bring non-congregate shelter or affordable housing online. Focus on brick and mortar/physical assets since this is one time funding.</p>
<p>The Willow Domestic Violence Shelter *CoC Organization*</p>	<p>Domestic Violence Service Provider</p>	<p>Virtual Meeting</p>	<p>Non-congregate shelter needs to be high on the priority list but is concerned about staffing the shelter and what organizations have the capacity to run it – staffing of shelters is fundamental and expensive.</p>
<p>DCCCA, Inc.</p>	<p>Health Service Provider</p>	<p>Virtual Meeting</p>	<p>People facing substance use disorders usually face different barriers to getting housing including drug arrest/manufacturing/distribution records. It's much harder to get Landlords to accept applications from these individuals.</p>
<p>Senior Resource Center - Douglas County</p>	<p>Senior Service Provider</p>	<p>Virtual Meeting</p>	<p>The senior housing situation, in Lawrence is tough – there isn't enough senior housing and supportive services is huge need. Medicare and Medicaid are lacking in the availability to provide needed assistance. Most seniors the SRC works with don't necessarily need ADA units, but they need first floor, flat entry type units, which are very difficult to find. In-home care isn't feasible with as many people that are aging. Long term supportive housing is very important.</p>

Public Participation

PJs must provide for and encourage citizen participation in the development of the HOME-ARP Allocation Plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP Allocation Plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP Allocation Plan and prior to submission.

For the purposes of HOME-ARP, PJs are required to make the following information available to the public:

- The amount of HOME-ARP funding the PJ will receive
- The range of activities the PJ may undertake

Summary of the public participation process:

The City recognizes the importance of collecting input and feedback from citizens residing within the community when designing programming that will ultimately impact residents the most. As such, the City conducted extensive outreach and engagement efforts to ensure broad public participation in the development and review of the HOME-ARP Allocation Plan.

To initiate its public participation process, the City created a 14-question Citizen Participation Survey designed to collect feedback from the perspective of residents within the community regarding key populations in need, unmet needs within the community, and to identify priority areas for new services and programs to reduce homelessness and increase the availability of affordable housing.

Public comment period and public hearing

The draft HOME-ARP Allocation Plan was made available for public comment Friday, February 10, 2023 – Friday, February 24, 2023. The City made the draft HOME-ARP Allocation Plan available to the public via the City’s website and also in print at the City of Lawrence Planning and Development Services office.

The City’s public hearing to discuss the draft HOME-ARP Allocation Plan was held during the Affordable Housing Advisory Board meeting on February 13, 2023 at 11:00 A.M. CST. The public hearing was held in a hybrid format, in person in the City Commission Room in City Hall located at 6 E 6th St, Lawrence, KS 66044, and virtually via Zoom. The agenda and supporting materials are located on the City’s website:

<https://lawrenceks.civicweb.net/Portal/MeetingInformation.aspx?Org=Cal&Id=1235>.

The City’s [Limited English Proficiency Plan](#) states that no limited English proficiency (LEP) language group has more than 1,000 in number in the program area and only 0.8% of the total population within the program area is defined as being LEP. These population numbers do not

meet the threshold for the “safe harbors” for written translation, therefore the draft HOME-ARP Allocation Plan was made available to the public in English.

To market the City’s public comment period and public hearing, the City published a legal notice in the Lawrence Journal World on Tuesday, February 7, 2023.

• Public comment period start & end date:	<u>2/10/2023 – 2/24/2023</u>
• Public hearing date:	<u>2/13/2023</u>

In May 2023, HUD provided the City with feedback on necessary edits to the City’s initial draft of the HOME-ARP Allocation Plan. As such, the City completed the necessary edits to the HOME-ARP Allocation Plan as requested by HUD. To accommodate the substantial amendments to the initial draft of the HOME-ARP Allocation Plan, the City made the second draft of its HOME-ARP allocation available for public comment Tuesday, August 29, 2023 – Tuesday, September 12, 2023. The City made the draft HOME-ARP Allocation Plan available to the public via the City’s website and also in print at the City of Lawrence Planning and Development Services office.

Due to the City’s [Limited English Proficiency Plan](#) stating that no limited English proficiency (LEP) language group has more than 1,000 in number in the program area and only 0.8% of the total population within the program area is defined as being LEP, the City continues to acknowledge that these population numbers do not meet the threshold for the “safe harbors” for written translation. As such, the second draft HOME-ARP Allocation Plan was only made available to the public in English.

To market the City’s public comment period and public hearing for its second draft HOME-ARP Allocation Plan, the City published a legal notice in the Lawrence Journal World on Tuesday, August 29, 2023.

• Second public comment period start & end date:	<u>8/29/2023 – 9/12/2023</u>
• Second public hearing date:	<u>9/11/2023</u>

Summary of efforts to broaden public participation:

The City began to execute its public participation efforts on Tuesday, January 17th, 2023 by launching its Citizen Participation Survey across multiple platforms. Surveys were made available for two and half weeks, were produced in English and Spanish, and were available online and in-person as a hard copy at key locations throughout the community. Distribution of the surveys included:

- Publishing on the City’s housing website (<https://lawrenceks.org/community-engagement/home-arp/>)
- Posts on the City’s social media platforms (<https://www.facebook.com/CityOfLawrence/>)

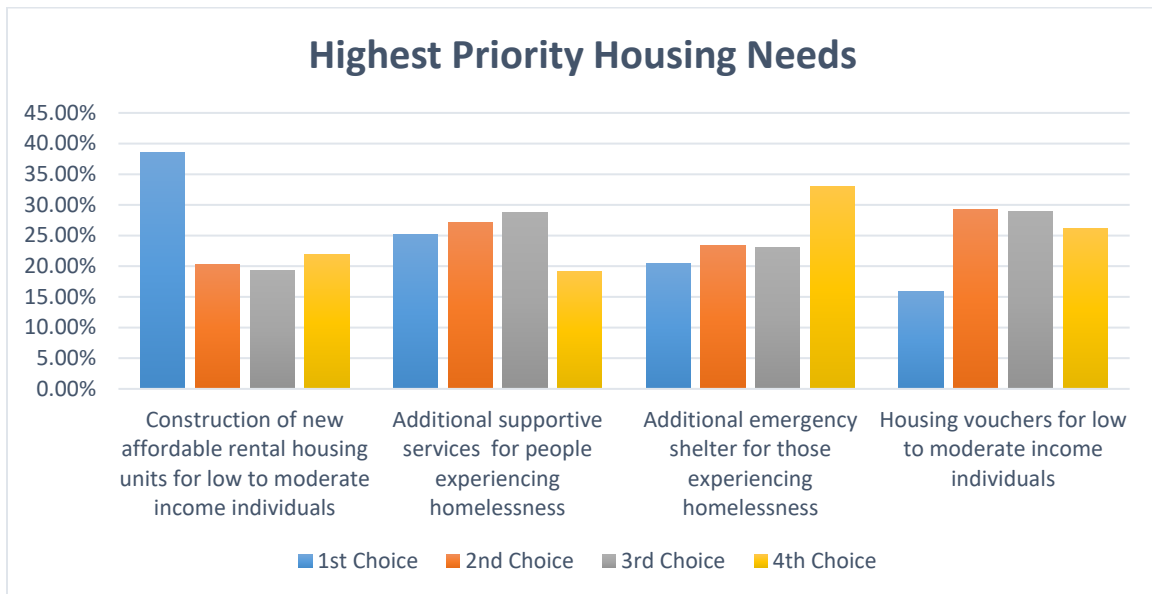
- Email distribution to CoC members, stakeholder organizations, and service providers
- Meetings with case managers and stakeholder organizations
- The “News” section of the City’s website (<https://lawrenceks.org/2023/01/26/city-survey-now-available-for-home-arp-funding/>)

The City’s Citizen Participation Survey received a total of 918 responses (917 – English, 1 – Spanish) from a broad cross section of the community. The City’s Limited English Proficiency Plan states that the Spanish speaking population in the area totals 0.29% of the population, which makes the survey response from this population on-trend with other populations.

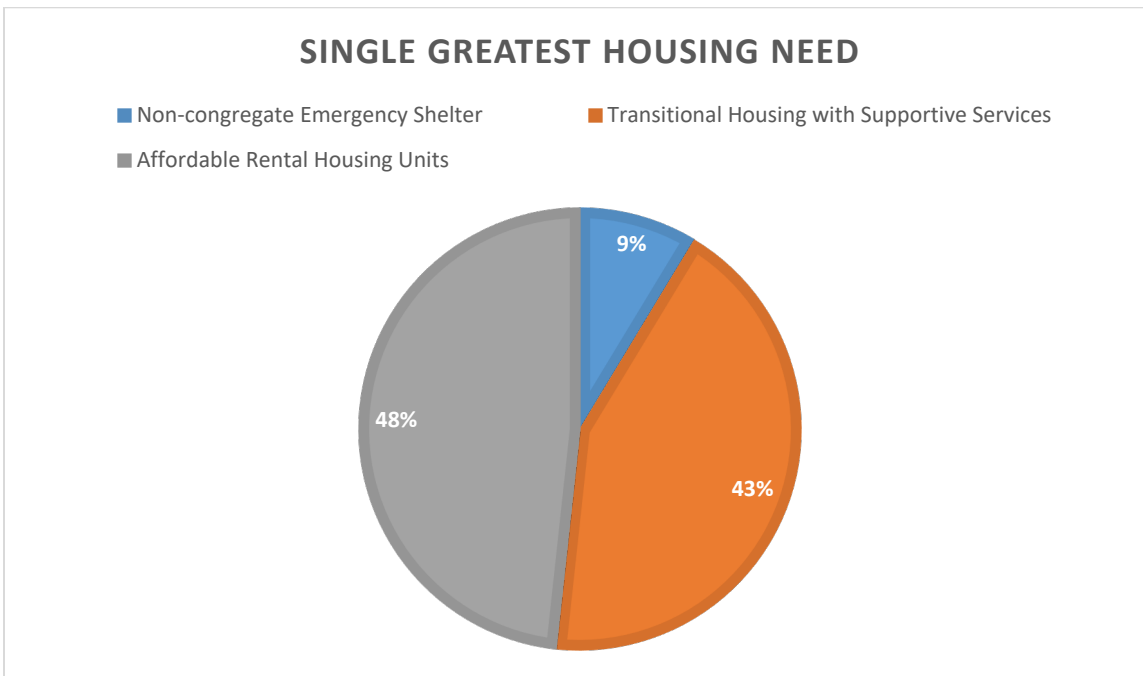
Summary of comments and recommendations received through public participation process:

The City of Lawrence received feedback from 918 community residents during the public participation process. Comments and recommendations were received both from members of the public as well as stakeholder organizations and service providers. The detailed comments and recommendations from the 918 community residents are summarized below.

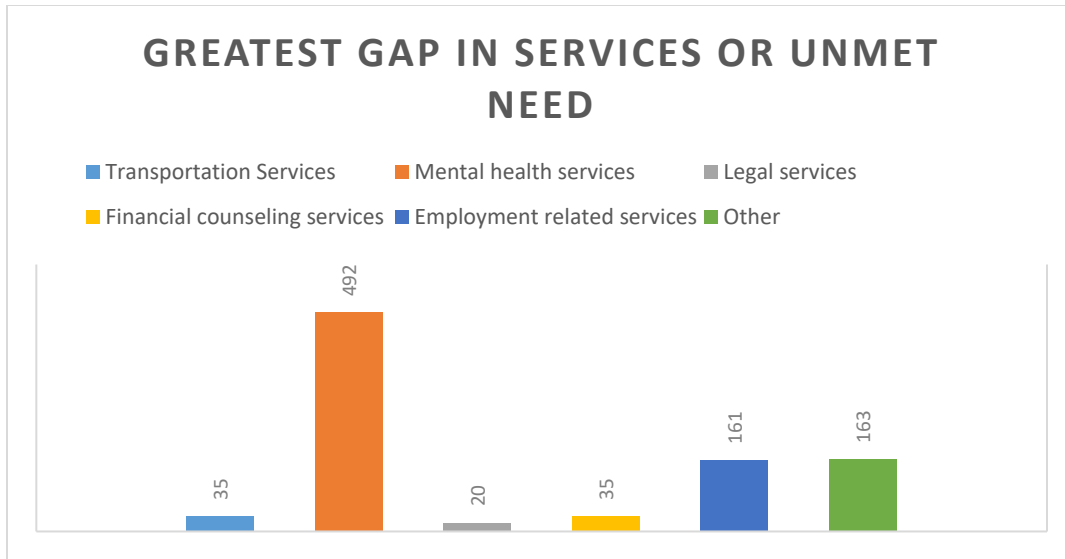
- Citizen Comments and Recommendations
 - Of the 918 individuals that responded to the Citizen Participation Survey:
 - 38.5% identified construction of new affordable rental housing units as their top priority
 - 25.2% of respondents identified additional supportive services as their top priority
 - 20.5% of respondents identified additional emergency shelter for those experiencing homelessness as their top priority
 - 15.8% of respondents identified housing vouchers for low to moderate income individuals as their top priority



- When asked about the single greatest housing need in the community:
 - 9% of respondents identified non-congregate shelter
 - 43% of respondents identified transitional housing w/ supportive services
 - 48% of respondents identified affordable rental housing units



- When asked about what respondents believed to be the most needed service for individuals that are homeless or at-risk of homelessness:
 - 490 respondents identified mental health services
 - 161 respondents identified employment related services
 - 163 respondents identified other, citing that "all are important," "unsure," "rent control," "rehabilitation services," et al.



The data collected from the Citizen Participation Survey indicates that the feedback from the public is in support of **constructing new affordable rental housing units**. Additionally, there is a need for some type of **transitional housing with support services** and the community shows strong support of **increasing mental health services**.

Additional long-form comments were received that covered a range of other topics related to wrap around services, substance abuse services, accessible homes, and high housing costs, rezoning, and home repair services.

Acceptance of public comments or recommendations

The City has reviewed and accepted all comments and recommendations that were submitted via the Citizen Participation Survey; feedback received during the first and second public comment periods, and public hearing processes were considered and analyzed. All comments and recommendations received upon completion of the public comment period and the public hearing were considered and analyzed as part of the HOME-ARP Allocation Plan development process.

Lawrence Douglas County Demographic Profile

Lawrence was first surveyed in July 1854 by Dr. Charles Robinson and Charles H. Branscomb of the Massachusetts Emigrant Aid Society. They concluded the best site in the Kansas Territory for a new settlement was at the confluence of the Kansas and Wakarusa Rivers. The city was named after abolitionist Amos Lawrence, a financial contributor to the New England Emigrant Aid Company whose members were among the area’s earliest settlers.

Lawrence is the county seat of Douglas County, one of the original 33 counties created by the First Territorial Legislature in July 1855. The county was named in honor of Stephen A. Douglas, a United States Senator from Illinois who had supported the Kansas-Nebraska Act in 1854.

As railroads continued to push westward, the many wagon trails became obsolete. The railroads also created jobs and led to several manufacturing businesses. The first railroad in Douglas County was the Kansas Pacific Railroad, constructed in 1864, and in 1869 the Leavenworth, Lawrence & Galveston Railroad was built south from Lawrence into Franklin County. By 1871 the railroad in Lawrence established an unbroken connection with St. Louis, Missouri, and points farther east. This spawned more railroads to come through the county, and the completion in 1879 of the Lawrence Dam on the Kansas River ushered in a new era in Lawrence's economic history.

By the early 1880s, Lawrence functioned as a prosperous market town for agricultural businesses located within Douglas County, in a regional economy dominated by the larger cities of Kansas City, Missouri, and Topeka, Kansas. At this time, two and three-story brick and stone factory buildings, warehouses, wholesale houses, and retail businesses became more prominent in the townscape.

By the turn of the century Douglas County was called home to 25,096 people. However, the population would drop as manufacturing slowed and the nation neared the Great Depression. In the post-World War II period, the county promoted itself as a site for plant relocation because of the federal government's recommendations that industry move inland from heavily industrialized coastal areas. Soon new plants were established, and the county moved into other commercial avenues such as technology, health care, education, finance, and scientific research. During this period, the county's population grew to 34,086 and continued to grow over the years.

Today, Douglas County is one of the fastest-growing counties in Kansas and the city of Lawrence, its county seat, is a welcoming community synonymous with arts, diverse culture, fun, and a quintessential downtown. City parks and community events contribute to the vibrancy experienced by all people in Lawrence. Additionally, Lawrence is the home of the University of Kansas, the state's flagship university founded in 1866. The University of Kansas has a current enrollment of 28,500 students and is a premier research institution, serving the state, the nation, and world.

Total Population

According to the U.S. Census Bureau, 2017-2021 American Community Survey (ACS) 5-Year Estimates, the total population of Douglas County, which includes the cities of Lawrence, Baldwin, Eudora, and Lecompton, was estimated as 118,690. Of this total population, it was estimated that 110,515 reside within the County's 49,259 households.

Race & Ethnicity

Douglas County's White population was estimated at 95,599, or 80.5%, of the total population. The County's Black population was estimated at 4,991, or 4.2%. Persons indicating that they were of two or more races was estimated at 8,391, or 7.1%, of the total population. Douglas County's Asian population was estimated at 6,045, or 5.1% of the total population. American Indian and Alaska Native accounted for 2,377, or 2.0%, of the total population.

Of Douglas County's 118,690 estimated persons, 7,732 were of Hispanic ethnicity. This figure constituted 6.5% of the total population, with persons of Mexican heritage estimated at 5,341 of all Hispanic persons.

Gender & Age

According to the 2017-2021 5-year estimate of the ACS, it was estimated that of Douglas County's 118,690 persons, 59,761, or 50.4%, were female and an estimated 58,929, or 49.6%, were male.

According to the 2017-2021 5-year estimate of the ACS the estimated number of persons over 18 years of age was 97,088, or 81.8%, of the total population. Of the estimated 97,088 persons over the age of 18, 31.5% are between 20 to 34 years of age, 21.8% are between 35 to 54 years of age, 10.1% are between 55 to 64 years of age, 7.8% are between 65 to 74 years of age, and 4.7% are over the age of 75.

Household Type

Estimates tabulated by the ACS using 2017-2021 5-year estimates revealed 20,994 households being married-couples. This represented 42.6% of Douglas County's 49,259 households. A total of 16.1% of married-couple households had at least one child under the age of 18 living in the household.

An estimated 11,177 households were male without a spouse present and 12,625 were female without a spouse present. These totals represented 22.7% and 25.5% respectively.

An estimated total of 7,015 or 14.2% of householders were males living alone, and of these types of householders, 1,140 or 2.3% were 65 years and over. An estimated total of 8,192 or 16.6% of householders were females living alone, and of these types of householders, 2,891 or 5.9% were 65 years and over. And of all households, 10,954 or 22.2% had one or more persons over the age of 65.

The overall average household size for Douglas County was estimated at 2.24.

Educational Attainment

Of an estimated 69,820 persons over age 25 according to the 2017-2021 5-year estimate of the ACS, 20,103 have a bachelor's degree and 16,441 have a graduate or professional degree. Thus 52.3% of the working age population are college graduates.

Workforce

According to the [Lawrence Area Economic Summary](#) of February 3, 2023 published by the Bureau of Labor Statistics (BLS), 51,900 persons were employed in non-farm industries. The number one ranked industry in terms of employed persons as enumerated by the summary was Government workers at 15,200. Following was Trade, Transportation, and Utilities employing 7,500 workers. Leisure and Hospitality was the third ranked industry employing 6,800 workers. The fourth ranked industry in the Lawrence area was Education and Health Services employing 5,400 workers.

Socioeconomic data from estimates provided by the ACS 2017-2021 5-year surveys gives additional detail of the economy of Douglas County. This data looks at industry of employed persons living within Douglas County. The largest employer of persons living in Douglas County according to ACS estimates is the industrial classification Educational Services, Health Care and Social Assistance. This industry employed an estimated 20,392 workers constituting 30.6% of all laborers. The Educational Services industry was the number one employer of Douglas County residents, which is reflective of the role of the University of Kansas (located within the City of Lawrence), which contributes approximately 10,000 individuals to the local job market.

The industry employing the second largest number of persons residing in Douglas County according to estimates provided by the 2017-2021 ACS 5-year estimate was Arts, Entertainment, and Recreation, Accommodation and Food services employing 7,873 persons, or 11.8% of the total labor force. The only other industries employing a percentage of workers in the double digits was Retail Trade employing 7,632 persons, or 11.4%, of the labor force and Professional, Scientific, & Management, and Administrative and Waste Management Services employing 7,407, or 11.1%, of the labor force.

In terms of job occupations, the 2017-2021 ACS 5-year estimate shows that Management, Business, Science, and Arts occupations employed 30,710, or 46.1%, of the labor force. A total of 13,157, or 19.7%, of the labor force were employed in Sales and Office occupations. Service occupations employed 11,878, or 17.8%, of all laborers.

The Lawrence Area Economic Summary of February 3, 2023, published by the BLS, contained data on average hourly wages for selected occupations. For the entire Lawrence, Kansas area, the average hourly wage for all occupations was reported at \$22.88 as compared to \$28.01 for the U.S. Instructional Coordinators earned on average of \$29.15 an hour as compared to \$33.92 for the nation. Carpenters earned \$20.78 an hour as compared to \$26.53 nationally. Retail Salespersons earned \$14.48 an hour as compared to \$15.35 nationally.

The average weekly wages paid out by all industries in Douglas County was \$939 as compared to an average weekly wage for the nation of \$1,294.00.

To get to work, the ACS 2017-2021 5-year estimate calculated that 48,048 or 73.3% of workers commuted alone by private automobile. An estimated 6,101 of workers, or 9.3%, did so from home. A total number of 5,449, or 8.3%, of workers carpooled to the job. Only 1,303, or 2.0%, of workers used public transportation to get to their job.

As of December 2022, the BLS calculated the unemployment rate for Douglas County at 2.6%, just a fraction lower than the national unemployment rate of 3.3%.

Household Income

The 2017-2021 ACS 5-year estimate calculated that of the 49,259 households residing in Douglas County, the median household income reached \$62,594. An estimated 20,896, or

42.6%, of households had incomes above \$75,000, which was greater than the Douglas County median income.

Programs funded under the U.S. Department of Housing and Urban Development (HUD) utilize special tabulations done by the Bureau of the Census to determine the number of low-to-moderate income households specifically for designated metropolitan statistical areas. A low-to-moderate income household is one having an annual median income for the area at 80% of the median. What constitutes median income is further adjusted for households of varying sizes. The tabulations published by HUD for the Lawrence, Kansas Metropolitan Statistical Area for fiscal year 2022 calculates that a low-income household consisting of only one person would have an annual median income of \$52,950.00. Adjusting for a household having 2-household members, a low-income household would have an estimated annual median income of \$60,500.00. Adjusting for a household having 3-household members, a low-income household would have an estimated annual median income of \$68,050. Adjusting for a household having 4-household members, a low-income household would have an estimated annual median income of \$75,600.

Households whose annual incomes are 30% and below the median area income are determined by HUD to be extremely low-income households. Being considered an extremely low-income household is one of the conditions for HUD's definition of at risk of homelessness. According to HUD calculations, an extremely low-income household in the Lawrence, Kansas Metropolitan Statistical Area would have an annual income of \$19,850.00. Adjusting for households having 2-household members, an extremely low-income household would have an annual median income of \$22,700.00. Adjusting for households having 3-household members, an extremely low-income household would have an annual median income of \$25,550.00. And adjusting for households having 4-household members, an extremely low-income household would have an annual median income of \$28,350.00.

Elderly households and other household types who rely on some form of public economic assistance will also most likely be at risk of homelessness or at greatest risk of housing instability.

In Douglas County, according to the 2017-2021 ACS 5-year estimate, 11,671 households received social security with an average annual income of only \$22,808. Another 9,146 households received retirement income having an average annual income of \$33,212. A total of 1,249 households received supplemental security income with an annual income of \$9,619 on average. It was also estimated that 884 households received some form of public assistance in cash averaging \$2,358. A total of 2,692 households qualified to receive food stamps.

Finally, of an estimated 26,012 family households as computed by the ACS 2017-2021 5-year estimate for Douglas County, 6.7% live below poverty. According to the poverty data, 67.8% of these households are families with a female, having no spouse present, and having a child under the age of 5.

Household Tenure Type

The 2017-2021 5-year estimate of the ACS for Douglas County calculated that 49,259, or 94.1%, of housing units were occupied. A total of 3,062 of units were vacant. The rental vacancy rate was 5.5%, while the homeowner vacancy rate was a mere 0.7%.

Of occupied housing units, 24,669, or 50.1%, were owner-occupied, while the number of renter-occupied units was 24,590, or 49.9%. The average size of owner-occupied housing unit was 2.51 persons per unit, and the average size of renter-occupied housing units was 1.98 persons per unit.

Housing Costs

The Harvard Joint Center for Housing Studies released a study [on typical home values and mortgage affordability](#) as of April 2022. The median purchase price for a single-family home in the Lawrence, Kansas Metropolitan Area was \$285,519. The typical mortgage payment was \$1,476 with monthly owner costs totaling \$2,028. The annual income needed to afford housing for the typical mortgage and monthly owner costs was estimated at \$78,511.

The [National Association of Realtors \(NAR\)](#) also tabulates data on the costs of housing. For Douglas County for the third quarter of 2022, the median purchase price was \$269,920. The monthly mortgage payment for the third quarter was calculated at \$1,390. This is in comparison to the monthly mortgage payment for the third quarter of 2021 which was calculated at \$900 a month. Thus, the increase in housing costs over last year according to NAR for Douglas County was \$490.00.

Affordable Housing

Not everyone can afford the American dream of owning a home. As an example, the [Harvard Joint Center for Housing Studies](#) calculates the typical mortgage payment in the Lawrence, Kansas Metropolitan Area as \$1,476 a month. The annual income needed to afford housing was estimated at \$78,511. Yet, according to the 2017-2021 5-year estimate of the ACS, 28,273 households in Douglas County, a figure of 57.3%, had annual incomes below the \$78,511 necessary to purchase a home according to the estimate provided by the Harvard Joint Center for Housing Studies. Furthermore, the median income for Douglas County was calculated at \$65,594, which was \$15,917 below the annual income of \$78,511 estimated as necessary to afford a home.

To assist families and households earning annual incomes below the median to afford housing, each year the federal government allocates funds towards affordable housing production. Under the [Cranston-Gonzalez National Affordable Housing Act](#), Congress has defined affordable housing as an initial purchase price or after-rehabilitation value of homeownership units that do not exceed 95 percent of the area median purchase price for single family housing, as determined by HUD. The fiscal year 2022 unadjusted affordable housing sales limit for existing homes for metropolitan Lawrence, Kansas is \$245,000. This total might be compared to the median purchase price as tabulated by NAR for Douglas County, Kansas of \$269,920. The affordable sales limit for existing units increases to \$447,000 for a four-bedroom house and decreases to \$233,000 for a one-bedroom house. The unadjusted affordable sales limit for newly constructed homes in Douglas County, Kansas was \$264,000. The affordable sales limit

for newly constructed homes increases to \$482,000 for a four-bedroom house and decreases to \$251,000 for a one-bedroom house.

Affordable Rental Housing

Notwithstanding efforts to make affordable homeownership a reality to all Americans, not everyone can afford homeownership. Many households must find decent, safe, and sanitary affordable housing on the rental market.

According to the 2017-2021 5-year estimate ACS for Douglas County, Kansas, 24,284 occupied units received rents. The median rent was calculated at \$991 a month. An estimated 11,959 households paid rents above the median and a total of 9,678, or 40.4%, of all renter households paid more than 35% of their household income towards rent.

The Department of Housing and Urban Development establishes affordable rents for units eligible to be assisted with federal housing funds. For metropolitan Lawrence, Kansas, the fiscal year 2022 Fair Market Rent is \$702 for an efficiency unit; \$753 for a one-bedroom unit; \$937 for a two-bedroom unit; \$1,228 for a three-bedroom unit; \$1,371 for a four-bedroom unit; \$1,512 for a five-bedroom unit; and \$1,653 for a six-bedroom unit.

In 2022, Douglas County released a [Homelessness Needs Assessment Report](#) with additional findings on the affordability of housing. Citing 2021 data from [The National Low Income Housing Coalition](#), fair market rent at that time was for Douglas County was \$756/month for a one-bedroom and \$950/month for a two-bedroom. To afford a one-bedroom unit, an annual income \$30,240 would be needed. To afford a two-bedroom unit, an annual income of \$38,000 would be needed. The calculations equated to an hourly wage of \$15.54 for a one-bedroom and \$18.27 for a two-bedroom. During the time of the analysis, the minimum wage in Douglas County was \$7.25, less than half of the hourly wage needed to afford the rent for a one-bedroom unit. Thus, an individual earning minimum wage would need to work more than 100 hours per week to afford a two-bedroom unit.

The study also found significant gaps in the availability of affordable rental homes. Again, citing data from the National Low Income Housing Coalition, the [2022 Douglas County Homelessness Needs Assessment Report](#) determined that there was a shortage of 55,461 rental homes that are affordable and available for extremely low-income renters.

Housing Stock

According to the ACS 2017-2021 5-year estimate for Douglas County, of 52,321 housing units, 28,269 are single unit detached. This figure constituted 54.0% of all housing units. A total number of 5,202, or 9.9%, of housing units were single attached.

Housing structures having 10-19 units were estimated at 4,290, or 8.2%, of all units, while structures having 20 or more units were estimated at 5,594, or 10.7%, of all units.

In terms of bedroom-size, the majority of units have 3-bedrooms. The ACS 2017-2021 5-year estimate was that 17,506, or 33.5%, of all units have 3-bedrooms. The estimated number of 2-bedroom units is 14,143, or 27.0%. A total of 6,282, or 12.0%, of units are 1-bedroom units.

Of Douglas County’s 52,321 housing structures as tabulated by the 2017-2021 5-year ACS estimate, 21,492, or 41.10%, were constructed prior to 1979. Of these, 5,142, or 9.8%, were built prior to 1939. A total of 6,585 units were constructed during the period of 1980-1989, which means approximately 53.7% of housing units in Douglas County are over 30 years old.

Needs Assessment and Gaps Analysis

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including the Point in Time (PIT) count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services. The PJ may use the optional tables provided below and/or attach additional data tables to this template.

Homeless Needs Inventory and Gap Analysis Table

Homeless Needs													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	38	18	86	0	0								
Transitional Housing	30	12	9	0	0								
Permanent Supportive Housing	16	4	35	0	16								
Other Permanent Housing	4	1	2	0	0								
Sheltered Homeless						58	23	16	40				
Unsheltered Homeless						4	55	0	0				
Current Gap										24	115	150	0

Data Sources: 1. [Lawrence Douglas County Continuum of Care 2022 Point in Time \(PIT\) Count](#) 2. [2022 Douglas County Homelessness Needs Assessment](#)

Gap Analysis for Family Beds. Consultation with Agencies

Gap Analysis for Adult Beds. Consultation with Agencies

*Gap Analysis – Data reflecting a current gap in family beds, family units, adult beds, and adult units was not able to be determined due to the presenting data showing that current beds and units met the capacity of the City’s shelter needs

Housing Needs Inventory and Gap Analysis Table

Housing Needs			
	Current Inventory	Level of Need	Gap Analysis

	# of Units	# of Households	# of Households
Total Rental Units	26,297	#	#
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	965	#	#
Rental Units Affordable to HH at 50% AMI (Other Populations)	5,590	#	#
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)	#	4,205	#
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)	#	1,485	#
Current Gaps	#	#	3,240

Data Sources: 1. American Community Survey (ACS) 2017-2021 5-year estimate; 2. [Comprehensive Housing Affordability Strategy \(CHAS\) 2013-2017](#).

Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

Homeless as defined in 24 CFR 91.5

The 2022 PIT count for Douglas County indicated that a total of 140 households were homeless. In consideration, the PIT count is conducted annually, in January, and may under report the true number of homeless households and those at risk of homelessness in the unsheltered count. Of these households, 81 were sheltered and 59 were unsheltered. Of the 81 homeless households residing in a shelter, 49 were residing in emergency shelter and 32 were in transitional shelter.

The 140 households enumerated as homeless during the 2022 PIT count represented 232 persons. A total of 151 were sheltered and 81 were unsheltered. Of the homeless persons residing in a shelter, 105 resided in emergency shelter while 46 resided in a transitional shelter.

Of the 232 homeless persons identified as homeless during the PIT count, 126 were males and 101 were females. Two homeless persons identified as transgender and two homeless persons were gender fluid. Information on gender was not available for one other homeless person. Data was not collected for one homeless person.

The number of males residing in emergency shelter totaled 61 while the total number of females totaled 43 persons. One person residing in emergency shelter identified as gender fluid. The total number of females residing in transitional housing was greater than the number of males with 26 Women and 17 Men in residence. One person residing in transitional shelter was gender fluid and gender information not available for two other persons residing in transitional shelter. Of the total number of unsheltered homeless, Men outnumbered Women 48 to 32.

Of all homeless persons, 84, or 36%, were chronically homeless. Of the chronically homeless, 44 were unsheltered.

Consistent with the population at large for Douglas County, the majority of homeless persons during the PIT count were White. The number of White persons who were homeless reached 155, or 66%. A total of 44 homeless persons identified as Multi-Race. A total of 16 identified as Black. Eleven homeless persons identified as American Indian/Alaskan Native. Native Hawaiian or Other Pacific Islander was the racial identify of four homeless households while another four households had no race data available. There were no homeless persons during the PIT count who identified as Asian.

Of the 232 homeless persons in Douglas County on the night of the PIT, 23 were of Hispanic/Latino ethnicity with 5 being unsheltered.

The data on homeless persons reveals that White persons are more likely to experience homelessness in Douglas County and the proportion of homeless Women is noticeably higher than the state and national averages.

At Risk of Homelessness as defined in 24 CFR 91.5

Persons or families who are at risk of homelessness as defined in 24 CFR 91.5 are persons or families with incomes 30% and below the median area income who lack sufficient resources or support networks to prevent them from having to move into an emergency shelter. Such persons and families who are at risk of homelessness must also meet one of several conditions, such as living in a hotel/motel without receiving any housing assistance, living in overcrowded housing situations, recently having received notice they must move from their current housing, or who are living in the home of another due to some economic hardship.

Persons at risk of homelessness are not always identified and thus cannot be quantified until they apply for assistance. As such, there is no data available which may be relied upon to know how many households are at risk of homelessness. However, data made available by HUD's CHAS database tabulated from ACS surveys from 2015 to 2019, does contain estimates of the total number of households in the jurisdictions having incomes 30% or below median, while also experiencing one of four housing problems: overcrowded (i.e., there being more than 1.5 persons per room); cost burdened (i.e., paying more than 30% of their monthly income towards housing costs); or lacking complete plumbing or kitchen facilities. The CHAS data set using ACS estimates from 2015 to 2019 indicated that Douglas County had 8,150 households with incomes at or below 30% of HUD's area median family income. Of these households, a total of 6,800 had one or more housing problems and therefore likely to be at risk of homelessness.

Demographic data on households at or below 30% of HUD's median income who might likely be at risk of homelessness is not readily available from the current CHAS data prepared using 2015

to 2019 ACS survey data. However, demographic data is available when using CHAS data prepared from 2013 to 2017 ACS survey data.

According to the CHAS data calculations using 2013 to 2017 ACS data, a total of 6,260 households in Lawrence were extremely low-income. Of these households, the number of households counted as White reached 4,635, or 74%, of all extremely low-income households. The number of these households that had at least one of four housing problems was calculated at 4,060. The number of extremely low-income households counted as Black reached 415. This figure was only 6.6% of the total number of households estimated in the extremely low-income category. The total number of Black households in this income category who also experienced one of the four housing problems reached 345. The number of extremely low-income households counted as Asian reached 600. This figure was 9.6% of the total households estimated in the extremely low-income category. The total number of Asian households in this income category who also experienced one of the four housing problems reached 385. Households counted as American Indian and Alaskan Native made up 195 extremely low-income households or 3.1% of all such households. Of American Indian and Alaskan Native extremely low-income households, 165 had one or more housing problems. Hispanic households were also calculated. However, these calculations are not exclusive of race. Meaning, a household can be counted as Hispanic but also as White or Black. Consequently, a certain number of Hispanic households may also be represented in any race category. A total of 200 extremely low-income households were counted as Hispanic, constituting 3.2% of all households in the income category. Of these households, 190 were also estimated as having one of four housing problems.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice One of the determinants leading to homelessness and at risk of homelessness is domestic violence and stalking.

According to the [Domestic Violence, Stalking, and Sexual Assault In Kansas Report](#), as prepared by the Kansas Bureau of Investigation using data as reported by law enforcement agencies and collected in the [Kansas Incident Based Reporting System](#) (KIBRS), from 2018 to 2020 there were 2,357 Domestic Violence incidents reported in Douglas County. This total constituted an average of 786 Domestic Violence incidents reported per year. Over the 3-year period a total of 2,122 Domestic Violence incidents were reported in Lawrence alone.

Another 1,057 petitions for protection from abuse were filed within Douglas County from 2018-2020. This figure represented an average of 352 petitions per annum. While over the same period there were 750 filings in Douglas County seeking protection from Stalking. Additionally, the 3-year average for protection from Stalking reached 250 request per year.

According to the [2022 Douglas County Homelessness Needs Assessment Report](#), 36% of persons seeking supportive services experienced domestic violence and about 3 in 10 homeless individuals indicated fleeing violent situations.

Demographic data on persons fleeing domestic violence and stalking comes from the Willow Domestic Violence Shelter which services residents of Lawrence. As this data was published in the 2022 Douglas County Homelessness Needs Assessment, in 2021-2022, 70 households utilized shelter services. Support services were provided to just over 600 individuals. A total of 75% of all clients were female, while 86% of all clients were White. Black clients made up 10% of families seeking domestic violence assistance while 4% identified as having a multi-racial background.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

Other populations requiring services include those who are currently housed due to temporary or emergency assistance. During the Douglas County PIT count, 40 households were receiving such assistance. These households were being assisted via the Rapid Re-housing program.

The [Lawrence-Douglas County Housing Authority \(LDCHA\) 2022 Moving to Work Annual Plan](#) states that 1,176 households were planned to be served during the 2022 Fiscal Year. Of these households, 737 were to receive a housing voucher to assist them with finding housing on the open rental housing market, and another 356 households were planned to be served by leasing units owned by the LDCHA. The LDCHA also planned to serve 79 households with Housing Choice Voucher (HCV) units and one additional household through a state program. A total of three households were expected to be served by another state program offering homeownership opportunities.

Households defined as being at greatest risk of housing instability are those households having incomes 30% and below median income and who are also experiencing being severely cost-burdened, meaning they pay more than 50% of their monthly income towards housing costs. Data made available by HUD's CHAS database tabulated from ACS surveys from 2015 to 2019 indicated that 5,540 households in Douglas County have incomes at 30% and below HUD's area median household income and who are experiencing being severely cost burdened.

Demographic data on extremely low-income households who experience severe cost burden is not yet available for ACS 2015 to 2019 estimates. However, this data is available for 2013-2017 and provides an indication of the demographic makeup of households at greatest risk of housing instability.

With the conditions of being extremely low-income while also experiencing severe cost burdened classifying a household at greatest risk of housing instability, it was estimated that

3,605 White extremely low-income households were at greatest risk of housing instability; an estimated 335 Black extremely low-income households were at greatest risk of housing instability; an estimated 385 Asian extremely low-income households were at greatest risk of housing instability; an estimated 130 American Indian and Alaskan Native households were at greatest risk of housing instability; and 165 Hispanic households were at greatest risk of housing instability.

Households with incomes of 50% and below area median income and who meet other conditions for those households at risk of homelessness are also considered at greatest risk of housing instability. While there is no reliable data available to provide an estimate of how many households with incomes 50% and below area median family income have one of the conditions of at risk of homelessness, the CHAS database tabulated from ACS surveys from 2015 to 2019 does estimate that Douglas has 4,765 households with incomes between 31% and 50% of median income who have one of the four housing problems: overcrowded (i.e., there being more than 1.0 persons per room); cost burdened (i.e., paying more than 30% of their monthly income towards housing costs); incomplete plumbing facilities; and incomplete kitchen facilities. Of these households, 3,630 are owner and 1,135 renters.

To assess the demographics of other households who may also be at greatest risk of housing instability, again CHAS ACS data surveys from 2013-2017 must be utilized. According to the data calculations available, a total of 5,150 households in Lawrence were low-income. Of these households, the number of households counted as White reached 3,845 or 74.7% of all low-income households. The number of these households that had one of four housing problems was calculated at 3,045. The number of low-income households counted as Black reached 260. This figure was only 5.0% of the total of households estimated in the low-income category. It was estimated that all of these Black households also experienced one of the four housing problems. The number of low-income households counted as Asian reached 340 or 6.6% of low-income households. The total number of Asian households in this income category who also experienced one of the four housing problems reached 215. Households counted as American Indian and Alaskan Native made up 170 low-income households or 3.3% of all such households. Of American Indian and Alaskan Native low-income households, 150 had one or more housing problems. Of low-income households, 445 were counted as Hispanic representing 8.6% of all households in the income category. And of these households, 410 were also estimated as having one of four housing problems.

A direct measure of households at greatest risk of housing instability is the number of households on the wait list for public housing. Currently, there are a total number of 553 households on the waiting list for affordable housing. Of these households, 169 are waiting for a unit owned by the LDCHA and 384 households are waiting for housing vouchers.

Based upon these estimates, it would be reasonable to conclude that close to 11,000 households are at great risk of housing instability within Douglas County.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing

Currently, there is only one Emergency Shelter providing services within the City of Lawrence. The Lawrence Community Shelter Inc. provides beds to 40 homeless persons on any given night with a maximum capacity to provide emergency shelter to 125 persons. The Bert Nash Community Mental Health Center has a capacity to provide 12 beds for homeless persons for an overnight stay. Family Promise of Lawrence, a faith-based program, seeks to place homeless persons in scattered site housing. Victims of domestic violence are served by Willow Domestic Violence Shelter. Willow has 8 beds for families and 34 beds for single adults. During the winter, the City of Lawrence makes facilities available to provide overnight beds to up to 52 persons having no place to stay.

Family Promise of Lawrence provides temporary housing utilizing scattered-sites. However, the primary activity to provide Transitional Housing within Douglas County is through transitional housing vouchers. The Lawrence Douglas County Housing Authority administers the Next Step Transitional Housing Voucher program which provides up to 36 months of rental assistance for youth transitioning out of the foster care system. Upon successful program completion, clients may transition to the general housing program. New Horizons Transitional Housing Program serves families with children experiencing homelessness who are currently residing at the Lawrence Community Shelter. Family Promise and Willow Domestic Violence Shelter also provides referrals to survivors of domestic violence. The City of Lawrence HOME Tenant Based Rental Assistance (TBRA) transitional housing program provides 24 months of rental assistance for households experiencing homelessness. The program has 11 active vouchers and an additional 8 households who have been issued a voucher and are searching for housing.

One of the greatest areas of need within the City of Lawrence and Douglas County is permanent supportive housing. There are currently no units of permanent supportive funded with funds from the city. And the capacity within the County was 51 units during the 2022 Point In Time count. One study conducted by the Corporation of Supportive Housing, as cited in the [2022 Douglas County Homelessness Needs Assessment](#), estimated that at least 115 units of permanent housing are needed to assist homeless persons to make the transition into permanent housing.

Individuals and their families fleeing domestic violence are served by the Willow Domestic Violence Shelter. Willow provides shelter for individuals fleeing domestic violence and services to help program participants achieve self-sufficiency and meet their individual goals. The shelter is a nine-bedroom, 30-bed residence. Willow also provides transitional housing and outreach, court advocacy, support groups, and emotional support through survivor access advocates. While Willow uses the Homeless Management Information System (HMIS) system to collect information on program participants staying in a shelter because they meet the federal HUD definition of homelessness, program participants in shelters represent only 9% of total clients served.

Describe the unmet housing and service needs of qualifying populations, including but not limited to:

- **Homeless as defined in 24 CFR 91.5**
- **At Risk of Homelessness as defined in 24 CFR 91.5**
- **Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice**
- **Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice**

Homeless

Interviews with service providers and an analysis of rates on substance use, mental health, and persons experiencing chronic homelessness as part of the development of the [2022 Douglas County Homelessness Needs Assessment](#) estimated that 150 individuals could break out of the homelessness cycle if supportive housing was available.

The [Corporation for Supportive Housing's needs assessment](#) (released May 2022) focused on community permanent supportive housing needs within Douglas County. Individuals and families experiencing homelessness need at least 115 permanent supportive housing units (as identified by the Homeless Management Information System or mental health and substance use treatment systems).

The City is working with partner agencies on increasing shelter bed capacities for our unsheltered population. Additionally, the City is working on mid-range plans for a "pallet village" for those in our community experiencing homelessness that will provide units for up to 75 persons.

The most significant unmet housing need for homeless persons and persons at risk of homelessness is the preservation or creation of affordable rental housing units.

At Risk of Homelessness

The greatest need identified for persons who are at risk of homelessness is the production of affordable rental units. When asked the question: "What is the single greatest need?", 48% responded affordable rental units. When asked about needs in general, 38.5% identified construction of new affordable rental housing units as their top priority. The [2022 Douglas County Homelessness Needs Assessment](#) estimated that 266 permanent supportive housing units are also needed to assist this population group.

The most contributing factor to persons being at risk of homelessness has been discovered to be mental health. Consequently, mental health services was the number one identified supportive service need for households at risk of homelessness. It has also been determined that to assist this population group from becoming homeless, it is critical to have a sufficient

number of housing counselors to assist this population group in navigating the housing market and also to educate this group on such important subjects as finance and substance abuse.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

The [2022 Douglas County Homelessness Needs Assessment](#) found that unlike their male counterparts, females described domestic violence as the number one catalyst of homelessness. Even where domestic violence may not be a catalyst, once homeless, Women identified a heightened concern for their physical safety. And many of these Women are not alone but with children. Therefore, emergency shelter needs require the availability of units that allow for children to stay with their mothers in residence.

Additional family units dedicated to victims of domestic violence and stalking located within the city boundary of Lawrence would better serve this unique population group. It has also been identified in the homelessness needs assessment that additional permanent housing units as well as affordable rental units would provide greater security to this qualifying population.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability.

Recent development trends have seen existing affordable units being renovated and converted to student housing or housing for higher income individuals. This combined with a very limited housing stock in general has resulted in higher rental prices across the local market. One point of discussion during the consultation process was that it is not uncommon to see monthly rents increase by several hundred dollars near the end of a current lease. The limited affordable housing stock is also restricting the ability to utilize existing housing vouchers as there are not enough landlords willing to accept them due to their ability to charge higher rates.

Households most significantly impacted by the increase in rents are those with incomes at 30% and below median income. Households with annual incomes between 30% and 50% of the median and who also meet one of the definitions of at risk of homelessness are also adversely impacted by higher rental prices.

Within these income categories, consultation with housing providers revealed the need for supportive housing for seniors to be high. Senior living facilities in Lawrence have ceased accepting Medicare as an income source.

More affordable housing options is the greatest unmet need of this population group. Using CHAS data provided by HUD on available units and number of households who were estimated as extremely low-income and low-income, it was estimated that 3,240 affordable housing units need to be added to the existing affordable rental housing inventory.

Additional housing counselors are also needed to assist households at greatest risk of housing instability to navigate the affordable housing market.

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

As acquired from consultation efforts, public participation, and from a review of previously collected data, several gaps within the current housing inventory and the service delivery system were identified.

Through consultation with community stakeholders and supporting data previously collected by the City, it was noted that there is a reduced number of affordable rental housing units available due to recent development activity that has resulted in affordable units being renovated and converted for student housing and housing for higher income individuals. As such, this results in a reduced number of affordable rental units available within the City's housing inventory. It was also noted that the largest gap in housing affordability is among rental households, specifically among extremely low- and low-income households. Additionally, because of the lack of available units, individuals are having difficulty utilizing existing voucher programs. In direct response to this identified gap, the City has elected to allocate \$1,395,175.55 towards the **Production of Affordable Rental Housing** in an effort to increase housing affordability and availability.

Regarding gaps within the service delivery system, the feedback and data collected and analyzed reflected a gap in providing equitable economic opportunities to address the wealth gap and housing affordability gap that serves as a roadblock to individuals and families that are homeless or at-risk of becoming homeless. It was noted that housing costs in the City of Lawrence are higher than the regional average while median household income is lower than the regional average. Such opportunities include job readiness training, life skills, financial counseling, etc. Additionally, gaps in the provision of adequate supportive services were also noted from consultation and public participation efforts. Of the 917 individuals that completed the Citizen Participation Survey, mental health services were ranked as the highest supportive service needed within the City with 492 respondents selecting it as the great gap in service offerings. Employment related services were ranked second at 161 responses. Supplemental to the Citizen Participation Survey, respondents to the Stakeholder Needs Assessment Survey asked service providers to identify the number of individuals that were turned away by their organization due to lack of capacity/resources. Of the 23 responses, 2 identified 0-24, 2 identified 25-50, 5 identified 51-100, 4 identified 101-150, and 2 identified 200 or more.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP Allocation Plan. These characteristics will further refine the definition of "other populations" that are "At Greatest Risk of Housing Instability," as established in the HOME-ARP Notice. If including these characteristics, identify them here:

The City of Lawrence has chosen not to further define/identify “other populations.”

Identify priority needs for qualifying populations:

Given the limited housing stock and dramatically increasing housing costs in the community, it was determined that Production or Preservation of Affordable Housing was the priority need for qualifying populations. While supportive services and tenant based rental assistance were also identified as priorities during the consultation process, it was determined that these activities would have limited impact without additional affordable housing units. Therefore, the highest and best use of the funding was identified as Production or Preservation of Affordable Housing.

Explain how the PJ determined the level of need and gaps in the PJ’s shelter and housing inventory and service delivery systems based on the data presented in the plan:

The level of need and gaps in the shelter, housing inventory, and service delivery systems were determined by analyzing data from the following primary sources:

- City of Lawrence, KS 2018-2022 Consolidated Plan,
- 2022 Balance of State PIT count,
- 2022 Douglas County HIC,
- 2022 Douglas County Homelessness Needs Assessment,
- American Community Survey 2017-2021 5-year estimate,
- 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data,
- 2013-2017 Comprehensive Housing Affordability Strategy (CHAS) data,
- Consultations with Douglas County area homeless need providers,
- Stakeholder Needs Assessment Survey, and
- Citizen Participation Survey.

HOME-ARP Activities

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

The City of Lawrence will be responsible for the solicitation process for all funds awarded under this ARP grant.

The City anticipates entering into contract agreements with local affordable housing developers to produce housing units which will be available for rent to all qualifying populations. The City will solicit development projects and promote opportunities through a range of methods that can include social media posts, announcement through DemandStar, the City’s existing email list, contacting local developers directly, and through a notice in local newspapers.

All funding awards will follow 2 CFR 200 procurement guidelines. Prior to accepting proposals for funding, the federal debarred contractor’s list is referenced to determine applicants are in good standing.

Describe whether the PJ will administer eligible activities directly:

The City has elected to not administer eligible activities directly.

If any portion of the PJs HOME-ARP administrative funds were provided to a subrecipient or contractor prior to HUD’s acceptance of the HOME-ARP Allocation Plan because the subrecipient or contractor is responsible for the administration of the PJ’s entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ’s HOME-ARP program:

The City did not provide any funds to a subrecipient or contractor that would be responsible for the administration of its entire HOME-ARP grant. Through a competitive Request for Qualifications (RFQ) process, the City awarded Virchow, Krause & Company, LLP a contract to engage in consultation services with the overall goal of completing its HOME-ARP Allocation Plan for submission to HUD as an amendment to its Fiscal Year 2021 annual action plan for HUD review and acceptance. The services provided by Virchow, Krause & Company, LLP are exclusive of the City’s administration of the HOME-ARP program.

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 0.00	0%	
Acquisition and Development of Non-Congregate Shelters	\$ 0.00	0%	
Tenant-Based Rental Assistance (TBRA)	\$0 .00	0%	
Development of Affordable Rental Housing	\$ 1,395,175.55	85%	
Non-Profit Operating	\$ 0.00	0%	5%
Non-Profit Capacity Building	\$ 0.00	0%	5%
Administrative and Planning	\$246,207.45	15%	15%
Total HOME-ARP Allocation	\$ 1,641,383.00		

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

As illustrated in the chart above, the City will address the needs of qualifying households by providing \$1,395,175.55 in funding for the Development of Affordable Rental Housing for

qualifying populations. Consultations with service providers during the development of the HOME-ARP Allocation Plan revealed that while TBRA and other HOME-ARP eligible activities would be beneficial for the community, they would have limited impact due to the limited availability of affordable housing units. These funds will be used for the production of new affordable rental housing units to allow for a greater utilization of existing TBRA funding.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provide a rationale for the plan to fund eligible activities:

The characteristics of emergency and transitional shelters within the City of Lawrence and Douglas County make temporary housing available to 58% of households. On the night of the PIT count, unsheltered families totaled 59 while sheltered families totaled 140. When it comes to the number of households that are at-risk of homelessness as defined by 24 CFR 91.5, 8,150 families fall into the category and close to 11,000 households are at a great risk of homelessness. Through the conduction of an analysis of housing needs, it was determined that there is a current gap of 3,581 affordable rental units in Lawrence-Douglas County.

Through consultation with local stakeholders and service providers, it was discovered that many persons struggling to obtain affordable housing could not do so because of low availability. This discovery, alongside the gap analysis, influenced the allocation of funds being used toward the production and preservation of affordable housing.

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

The City will allocate \$1,395,175.55 of its HOME-ARP allocation towards Development of Affordable Rental Housing. It is estimated that between 19 and 38 units will be created. The City will provide subsidies to developers of 20% to 40% of per unit costs. Estimates are based on recent LIHTC project data with per unit costs of approximately \$180,000. A 40% subsidy would result in a \$72,000 per unit contribution from HOME-ARP funding and a 20% subsidy would result in a \$36,000 per unit contribution from HOME-ARP funding. Subsidy levels will vary depending on the specific project details which is why a range of 19 to 38 units is being provided as a production housing goal.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJs priority needs:

The City intends to use \$1,395,175.55 of its HOME-ARP allocation to create between 19 and 38 units of affordable rental housing targeting incomes of 50% AMI and below. The need for affordable housing was the number one priority identified in consultation with stakeholders

and citizens. The City believes this funding will have the greatest impact in addressing this priority need by utilizing the funding to subsidize between 20% and 40% of development costs for new units.

Preferences

Identify whether the PJ intends to give preferences to one or more qualifying populations or a sub-population within one or more qualifying populations for any eligible activity or project:

The City intends to give preference to the following sub-populations within all qualifying populations for eligible activities and/or projects:

- Households with children
- Chronically homeless individuals and families

Households with children and chronically homeless individual and families are established in HUD regulations ([24 CFR 576](#)) and HOME-ARP Policy Guidance ([HOME-ARP Policy Brief Preferences, Methods of Prioritization, and Limitations](#)) as sub-populations for whom establishing preference for housing opportunities is allowable.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or category of qualifying population, consistent with the PJs needs assessment and gap analysis:

The [2022 Douglas County Homelessness Needs Assessment](#) found that 51% of the county's homeless were individuals that self-identified as women. This homeless sub-population is more likely to have accompanying children. A unique concern for this homeless sub-population group was the additional burden of having to protect children. The fear of sexual assault was a particular fear most unique to this sub-population group. There are no permanent housing units available within the City of Lawrence and other permanent housing units within Douglas County are sparse. The production of affordable housing units will enable homeless households with children, the majority of whom are headed by individuals that self-identify as female, and chronically homeless individuals and families to find housing more rapidly and readily.

Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page 10).

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program.

The City consulted with the Kansas Statewide Homeless Coalition (a collaborative applicant of the CoC) on June 20, 2023 in regards to the utilization of the CE process for referrals for HOME-ARP projects and activities. Based on this consultation, the City has elected to not use referral methods; specifically, the City has elected to not use a CE process for referrals for its HOME-ARP projects or activities.

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered.

After consultation with the Kansas Statewide Homeless Coalition, the City has elected to not use a CE process established by the CoC for qualifying populations eligible for its HOME-ARP projects and activities.

The City will coordinate with local organizations that work with qualifying populations to inform them of project developments which will have housing units designated for qualified populations. Opportunities for housing provided by funds made available under the City's HOME-ARP Allocation Plan will be available for eligible qualifying populations and subpopulations based on project or activity-specific waiting lists. The consolidated wait list will be kept in chronological order according to the date and time when applications are received, to the greatest extent practicable.

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE.

After consultation with the Kansas Statewide Homeless Coalition, the City has elected to not use a CE process established by the CoC. As such, the City will not be implementing a method of prioritization to be used by the CE.

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any.

The City has elected to not use both a CE process established by the CoC and another referral method for a project or activity. As such, the City will not be employing any method of prioritization between any two referral methods.

Limitations in a HOME-ARP Rental Housing or NCS Project

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD’s Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP Allocation Plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ’s HOME-ARP Allocation Plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

The City has elected to limit eligibility and set aside housing units limited to persons who are fleeing domestic violence or who are victims of stalking. Eligibility for housing opportunities among qualifying populations and subpopulations will extend to all unfortunate victims of domestic violence and stalking, regardless of sex, gender, or gender identity.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ’s needs assessment and gap analysis:

The limitation of projects assisted under this HOME-ARP Allocation Plan to persons fleeing domestic violence or stalking was deemed necessary because during the development of the 2022 Douglas County Homelessness Report, interviews conducted with persons experiencing homelessness revealed that a significant number of homeless persons and families were victims of domestic violence and stalking. For persons that self-identified as females, domestic violence was the primary catalyst for homelessness. Interviewees that self-identified as female, unlike

their counterparts that self-identified as male, had an increased vulnerability regarding their physical safety. According to self-identified female victims of domestic violence and stalking, they experienced the additional burden of protecting their children from violence. For this reason, the City will set aside housing units for persons fleeing domestic violence and stalking. With these limited housing opportunities, although the majority of victims of domestic violence and stalking are self-identified females, eligibility for housing opportunities will extend to all unfortunate victims of domestic violence and stalking, regardless of sex, gender, or gender identity.

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

Although there will be no specific projects limiting eligibility to households qualifying as at risk of homelessness or at greatest risk of housing instability, these qualifying populations will be eligible to receive assistance through the development of other affordable housing units to be funded under this Allocation Plan.

HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity.***

The City has elected to not use its HOME-ARP funds to refinance existing debt secured by multifamily rental housing. Consequently, the creation of refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#) is not applicable to the City's HOME-ARP Allocation Plan.

The City has elected to not use its HOME-ARP funds to refinance existing debt secured by multifamily rental housing. As such, establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity is not applicable at this time.

- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***

The City has elected to not use its HOME-ARP funds to refinance existing debt secured by multifamily rental housing. As such, requiring a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period is not applicable at this time.

- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***

The City has elected not to use its HOME-ARP funds to refinance existing debt secured by multifamily rental housing. As such, stating whether the new investment is being made to maintain current affordable units and/or create additional affordable units is not applicable at this time.

- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***

The City has elected not to use its HOME-ARP funds to refinance existing debt secured by multifamily rental housing. As such, specifying a required compliance period is not applicable at this time.

- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***

The City has elected to not use its HOME-ARP funds to refinance existing debt secured by multifamily rental housing. As such, stating that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG within the refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#) is not applicable at this time.

- ***Other requirements in the PJs guidelines, if applicable:***

The City has elected to not use its HOME-ARP funds to refinance existing debt secured by multifamily rental housing.

Appendix A
Lawrence HOME-ARP Legal Notice

LJWORLD.COM
LAWRENCE JOURNAL-WORLD
AFFIDAVIT IN PROOF OF PUBLICATION

STATE OF KANSAS
Douglas County

Kelly Schellman of the Legal Dept. of the Lawrence Daily Journal-World being first duly sworn, deposes and says:

That this daily newspaper printed in the State of Kansas, and published in and of general circulation in Douglas County, Kansas, with a general paid circulation on a daily basis in Douglas County, Kansas, and that said newspaper is not a trade, religious or fraternal publication, and which newspaper has been admitted to the mails as periodicals class matter in said County, and that a notice of which is hereto attached, was published in the regular and entire issue of the Lawrence Daily Journal-World

Said newspaper is published six days per week, 52 weeks per year; has been so published continuously and uninterruptedly in said county and state for a period of more than five years prior to the first publication of said notice and been admitted at the post office of Lawrence in said County as second class matter.

That the attached notice is a true copy thereof and was published in the regular and entire issue of said newspaper for 1 consecutive days/weeks the first publication thereof being made as aforesaid on 02/07/2023 with publications being made on the following dates:

02/07/2023



Subscribed and sworn to before me this 7th day of February 2023



Notary Public

My Commission Expires: 08/19/2024

Publication Charges: \$129.36



(First Published in the Lawrence Daily Journal-World on the 7th of February, 2023)

NOTICE OF PUBLIC HEARING AND PUBLIC COMMENT PERIOD FOR THE CITY OF LAWRENCE HOME INVESTMENT PARTNERSHIPS AMERICAN RESCUE PLAN (HOME-ARP) PROGRAM DRAFT ALLOCATION PLAN

Public Hearing - Members of the City's Affordable Housing Advisory Board will conduct a public hearing on the HOME Investment Partnerships American Rescue Plan (HOME-ARP) Program Draft Allocation Plan at the Affordable Housing Advisory Board meeting on Monday, February 13, 2023, at 11:00 am in the City Commission Chambers, First Floor, City Hall, 6 East 6th Street, Lawrence, Kansas, 66644.

This meeting will be held in a hybrid format, which means attendees can choose whether to attend in-person or virtually. People may join the meeting virtually by Zoom or in-person. Some staff will be present in the room while others will participate virtually. Virtual participation will be allowed for any participant, including staff, board members, and the public. Please contact the Housing Initiatives Division at 785-832-3113 or housinginitiatives@lawrenceks.org if you require special accommodations to attend this meeting.

The hearing is intended to allow members of the public to provide feedback on the Draft Allocation Plan for new HOME-ARP funding that the City of Lawrence is receiving. This is an opportunity for Lawrence citizens, public agencies, and other interested parties to express and discuss their opinions about the needs of low-income persons, housing and supportive services, and other needs in Lawrence they feel are important.

Public Comment Period - The Draft Allocation Plan for the HOME-ARP Program will be made available for public comment from February 10 through February 26. The Draft Allocation Plan will be posted on the City of Lawrence website and a paper copy of the Draft Allocation Plan will be made available for viewing at City Hall Riverfront, 1 Riverfront Plaza, Ste 220, Lawrence, Kansas, 66644. Public comments can be submitted in writ-

ing by emailing housing-
initiatives@lawrenceks.
org or by mailing to City of
Lawrence, Housing Initia-
tives Division, PO Box 708,
Lawrence, KS 66044.

AFFIDAVIT IN PROOF OF PUBLICATION

STATE OF KANSAS
Douglas County

Kelly Schellman of the Legal Dept. of the Lawrence Daily Journal-World being first duly sworn, deposes and says:

That this daily newspaper printed in the State of Kansas, and published in and of general circulation in Douglas County, Kansas, with a general paid circulation on a daily basis in Douglas County, Kansas, and that said newspaper is not a trade, religious or fraternal publication, and which newspaper has been admitted to the mails as periodicals class matter in said County, and that a notice of which is hereto attached, was published in the regular and entire issue of the Lawrence Daily Journal-World

Said newspaper is published six days per week, 52 weeks per year; has been so published continuously and uninterruptedly in said county and state for a period of more than five years prior to the first publication of said notice and been admitted at the post office of Lawrence in said County as second class matter.

That the attached notice is a true copy thereof and was published in the regular and entire issue of said newspaper for 1 consecutive days/weeks the first publication thereof being made as aforesaid on 08/29/2023 with publications being made on the following dates:
08/29/2023



Subscribed and sworn to before me this 29th day of August 2023



Notary Public

My Commission Expires: 08/19/2024

Publication Charges: \$60.28



(First Published in the Lawrence Daily Journal-World on the 29th of August, 2023)

NOTICE OF PUBLIC COMMENT PERIOD FOR THE CITY OF LAWRENCE HOME INVESTMENT PARTNERSHIPS AMERICAN RESCUE PLAN (HOME-ARP) PROGRAM REVISED DRAFT ALLOCATION PLAN

The Draft Allocation Plan for the HOME-ARP Program has been revised in response to HUD feedback and will be made available for public comment from August 29 through September 13. The Revised Draft Allocation Plan will be posted on the City of Lawrence website and a paper copy of the Revised Draft Allocation Plan will be made available for viewing at City Hall Riverfront, 1 Riverfront Plaza, Ste 320, Lawrence, Kansas, 66044. Public comments can be submitted in writing by emailing housing-initiatives@lawrenceks.org or by mailing to City of Lawrence, Housing Initiatives Division, PO Box 708, Lawrence, KS 66044.

Appendix B

Marketing of Citizen Participation Survey

The City of Lawrence is receiving \$1.6 million from the HOME Investment Partnership American Rescue Plan (HOME-ARP) Program to fund a variety of projects and services aimed at reducing homelessness and increasing the availability of affordable housing. The City has created a [survey](#) to gather community feedback on how to spend the funds.

The City strongly believes in the vision of Strong, Welcoming Neighborhoods; that every person in the community deserves access to safe and affordable housing and essential services that help them thrive. It is the City's intention to use this latest round of federal funding to further efforts in this area.

The survey is available online through Thursday, Feb. 2: lawrenceks.org/community-engagement/home-arp. It consists of 14 questions and should take only 10 minutes to complete. There is both an English and a Spanish version available on the site.

The survey is part of a community engagement process recommended by the Department of Housing and Urban Development (HUD). There will also be a 15 day public comment period, starting February 10. Public comments can be submitted in writing by emailing housinginitiatives@lawrenceks.org or by mailing the City of Lawrence, Housing Initiatives Division, PO Box 708, Lawrence, KS 66044. City staff will present the survey findings and draft Allocation Plan at the Affordable Housing Advisory Board meeting on Monday, Feb. 13. The funding Allocation Plan will be submitted to the City Commission for their review at an upcoming meeting in March.

While the latest round of federal funding allows the City to financially support additional community efforts to reduce homelessness and increase affordable housing, it is not the only work the City is doing in this space. The City is committed to fully meeting the community's needs for sanctuary camping and emergency shelter. While both sanctuary camping and emergency shelter are not long-term housing solutions, both are necessary steps to meet the needs of those who are unsheltered in the Lawrence and Douglas County communities.

The City provides space for sanctuary camping at the temporary support site in North Lawrence and for emergency shelter at the Winter Emergency Shelter. These

efforts also supplement the emergency shelter work of community partners, such as the Lawrence Community Shelter, Willow Domestic Violence Center, and Family Promise. These partners have been providing emergency shelter for years, and the City entered this space as an additional resource in response to growing community need. The City continues to rely on community partners for support services at the temporary support site and Winter Emergency Shelter.

The City of Lawrence also currently supports affordable rental housing and affordable homeownership through the Affordable Housing Trust Fund, which allocates funding annually to community organizations working in this space. More information on 2023 funding is on the City's [website](#).

More information on City of Lawrence homeless programs is online at: lawrenceks.org/pds/homeless-programs.

Contact: Danelle Walters, Housing Initiatives Manager, dwalters@lawrenceks.org

Appendix C

Lawrence HOME-ARP Community Resident Participation Survey (English)

Lawrence KS HOME-ARP Community Resident Participation Survey

The City of Lawrence, KS is receiving federal funds from the HOME Investment Partnership American Rescue Plan (HOME-ARP) Program to fund a variety of projects and services aimed at reducing homelessness and increasing the availability of affordable housing. Your input will help the City determine the best uses of these funds.

1. What is your housing situation? Please mark the appropriate box.

- Own your home
- Rent
- Live with others who own or rent
- Live in a shelter or other transitional living center
- Live in assisted living or other group quarters
- Live on the street, in a car, or in a homeless encampment

2. If you own your home, how long have you owned it?

- 1 year or less
- 1 or 2 years
- 3 to 5 years
- 5 to 9 years
- 9 years or more

3. If you rent your home, how long have you rented in your current location?

- 1 year or less
- 1 to 2 years
- 3 to 5 years
- 5 to 9 years
- 9 years or more

4. What is your age?

- Under 25
- 25-34
- 35-44
- 45-54
- 55-64
- 65+

5. What is your total household income?

- Less than \$26,850
- \$26,850 - \$44,749
- \$44,750 - \$53,699
- \$53,700 - \$71,599
- \$71,600 - \$89,499
- \$89,500 - \$107,399
- \$107,400 or more

6. What is your household size?

- 1
- 2
- 3
- 4
- 5+

7. Race (optional information)

- Black/African American
- American Indian/Alaskan Native
- Asian American
- Hawaiian/Pacific Islander
- Multi-Racial
- White
- Choose not to respond

8. Ethnicity (optional information)

- Hispanic
- Non-Hispanic

9. What would be the maximum amount you could pay for rental housing per month?

- less than \$500
- \$500-\$700
- \$701-\$900
- \$900-\$1,100
- more than \$1,100

10. Have you observed significant unmet housing or service needs for specific populations (veterans, persons with disabilities, persons experiencing homeless or at-risk of homelessness, victims of domestic violence, human trafficking, etc.)? If so, please describe.

11. The following is a list of potential uses for HOME-ARP funding to address homelessness and lack of affordable housing. Please rank these options from 1 to 4, 1 being what you believe is the highest priority and 4 being the lowest.

- Construction of new affordable rental housing units for low to moderate income individuals (Example: a family of 3 with a household income of \$68,050 or less)
- Additional emergency shelter units for those experiencing homelessness (no cost for individuals to use these units for a limited period of time)
- Housing vouchers for low to moderate income individuals (Example: a family of 3 with a household income of \$42,550 or less)
- Additional supportive services for people experiencing homelessness or at risk of homelessness (Examples of supportive services include mental health counseling, transportation, legal, financial, employment, etc.)

12. HOME-ARP funds can be used for housing solutions targeted at lower income individuals and families that range from short-term emergency shelters to longer-term permanent housing options. What do you think is the single greatest need for housing in the community? Please choose only one.

- Non-congregate emergency shelters (short-term accommodations for individuals currently experiencing homelessness)
- Transitional housing with supportive services (temporary housing for a period of 1-2 years with supportive services to help individuals and families transition to permanent housing)
- Affordable rental housing units (long-term permanent housing for low-income individuals and families)

13. What do you believe is the most needed service for individuals at risk of or currently experiencing homelessness? Please choose only one.

- Transportation services (either public or personal vehicles)
- Mental health services
- Legal services
- Financial counselling services
- Employment related services

14. Have you sought housing or supportive services in the past and were either denied service or placed on a waiting list due to lack of availability? Please provide additional detail below regarding the type of service that you requested, what the response was, and how long you have waited for service.

15. Please provide any other information or feedback that would help the City identify projects and services for this new federal funding.

Appendix D

Lawrence HOME-ARP Community Resident Participation Survey (Spanish)

Encuesta sobre la participación de residentes de la comunidad en HOME-ARP de Lawrence, KS

La Ciudad de Lawrence, KS recibe fondos federales del Programa de Sociedad de Inversión en el Hogar Plan de Rescate Americano (HOME-ARP) para financiar diversos proyectos y servicios que tienen por objeto reducir la cantidad de personas sin hogar y aumentar la disponibilidad de viviendas accesibles. Sus comentarios ayudarán a la Ciudad a determinar la mejor manera de utilizar dichos fondos.

1. ¿Cuál es su situación de vivienda?

- Propietario de su vivienda
- Alquila
- Vive con otras personas que son propietarias o alquilan
- Vive en un refugio u otro centro de vivienda de transición
- Vive en un centro de vivienda asistida u otras residencias grupales
- Vive en la calle, en un vehículo o en un campamento de personas sin hogar

2. Si es propietario de su hogar, ¿hace cuánto tiempo que lo es?

- 1 año o menos
- 1 a 2 años
- 3 a 5 años
- 5 a 9 años
- 9 años o más

3. Si alquila su hogar, ¿hace cuánto tiempo que alquila en su lugar actual?

- 1 año o menos
- 1 a 2 años
- 3 a 5 años
- 5 a 9 años

9 años o más

4. ¿Cuál es su edad?

Menos de 25

25-34

35-44

45-54

55-64

65 o más

5. ¿Cuáles son los ingresos totales de su hogar?

Menos de \$26,850

\$26,850 - \$44,749

\$44,750 - \$53,699

\$53,700 - \$71,599

\$71,600 - \$89,499

\$89,500 - \$107,399

\$107,400 o más

6. ¿Cuál es el tamaño de su hogar?

1

2

3

4

5 o más

7. Raza (información opcional)

- Negro/afroamericano
- Indio americano/nativo de Alaska
- Asiático americano
- Hawaiano/islas del Pacífico
- Multirracial
- Blanco
- Prefiere no responder

8. Etnicidad (información opcional)

- Hispánico
- No hispánico

9. ¿Cuál sería el monto máximo que podría pagar por mes por una vivienda de alquiler?

- Menos de \$500
- \$500-\$700
- \$701-\$900
- \$900-\$1,100
- Más de \$1,100

10. ¿Notó necesidades insatisfechas significativas de vivienda o servicios de poblaciones específicas (veteranos, personas con discapacidades, personas sin hogar o en riesgo de quedarse sin hogar, víctimas de violencia doméstica, trata de personas, etc.)? De ser así, descríbalas.

11. La siguiente es una lista de usos potenciales de los fondos de HOME-ARP para hacer frente a la situación de sin hogar y la falta de viviendas accesibles. Le pedimos que clasifique estas opciones en una escala de 1 a 4, en la que 1 es lo que usted considera que es la prioridad más alta y 4 es la más baja.

- Construcción de nuevas unidades de viviendas de alquiler accesibles para personas de ingresos bajos a moderados (ejemplo: una familia de 3 con ingresos del hogar de \$68,050 o menos)
- Unidades de refugios de emergencia adicionales para personas sin hogar (sin costo para las personas que utilizan dichas unidades durante un período limitado)
- Vales de viviendas para personas de ingresos bajos a moderados (ejemplo: una familia de 3 con ingresos del hogar de \$42,550 o menos)
- Servicios de apoyo adicionales para personas sin hogar o en riesgo de quedarse sin hogar (los ejemplos de servicios de apoyo incluyen orientación de salud mental, de transporte, legales, financieros, de empleo, etc.)

12. Los fondos de HOME-ARP se pueden utilizar para soluciones de vivienda orientadas a personas y familias de ingresos más bajos que van de refugios de emergencia de corto plazo a opciones de vivienda permanente de más largo plazo. ¿Cuál considera que es la mayor necesidad de vivienda en la comunidad? Elija solo una.

- Refugios de emergencia no congregados (alojamiento de corto plazo para personas actualmente sin hogar)
- Viviendas de transición con servicios de apoyo (viviendas temporales para un período de 1-2 años con servicios de apoyo para ayudar a las personas y familias en su transición a una vivienda permanente)
- Unidades de viviendas de alquiler accesibles (viviendas permanentes de largo plazo para personas y familias de ingresos bajos)

13. ¿Cuál considera que es el servicio más necesario para las personas actualmente sin hogar o en riesgo de quedarse sin hogar? Elija solo uno.

- Servicios de transporte (vehículos públicos o personales)
- Servicios de salud mental
- Servicios legales
- Servicios de asesoramiento financiero
- Servicios relacionados con el empleo

14. Incluya toda otra información o comentario que ayudaría a la Ciudad a identificar proyectos y servicios para estos nuevos fondos federales.

Appendix E

Lawrence HOME-ARP Stakeholder Survey

2/7/23, 5:23 PM

Lawrence HOME-ARP Stakeholder Survey

Lawrence HOME-ARP Stakeholder Survey

The City of Lawrence, KS is receiving federal funds from the HOME Investment Partnership American Rescue Plan (HOME-ARP) Program to fund a variety of projects and services aimed at reducing homelessness and increasing the availability of affordable housing. Your input will help

1. What is the name of your organization?

2. What type of organization do you work for?

*A definition of qualifying populations as defined by the Department of Housing and Urban Development (HUD) can be found within HUD's Final HOME-ARP Implementation Notice.

- Homeless service provider
- Domestic violence/dating violence/human trafficking, etc. service provider
- Veterans' groups and/or service provider
- Public housing agencies (PHAs)
- Public agencies that address the needs of the qualifying populations as defined in CDP-21-10*
- Public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities
- Other

3. What income levels does your organization serve?

- Extremely low income limit (30% of median) or less
- Very low income limit (50% of median) or less
- Low income limit (80% of median) or less
- N/A - my organization serves all income levels.

4. Based on your experience working with various unserved and/or underserved populations, please rank the issues you believe are the highest priority at this time, starting with the highest priority. (Use the up/down arrow on the right side of each option to change the ranking order. The arrows will appear when you hover over the option)

Lack of affordable rental housing

Types of housing available do not fit the needs/desires of the residents (apartments v. single family, size of unit, etc.)

Barriers to accessing housing (criminal background, poor credit, etc.)

Lack of financial assistance (vouchers, down payment assistance, etc.)

Lack of supportive services or case management to connect individuals with available housing

Lack of emergency shelter units

5. Please rank the following eligible uses of HOME – ARP funds in terms of priority, starting with the highest priority.

Development of more affordable housing
Rental Assistance
Supportive Services
Acquisition and development of non-congregate shelters
Nonprofit operating assistance
Nonprofit capacity building assistance

6. Are there specific populations (veterans, persons with disabilities, persons experiencing homeless or at-risk of homelessness, victims of domestic violence, human trafficking, etc.) that you believe should be prioritized for the use of HOME-ARP funding due to significant unmet housing or supportive service needs? If so, please describe.

7. Has your organization turned away or placed individuals on a wait list for housing or services in the last year due to lack of capacity/resources?

- Yes
- No

8. If you selected 'yes' to the question above, please select the number of individuals turned away due to lack of capacity/resources from the ranges provided below.

- 0-24
- 25-50
- 51-100
- 101-150
- 151-200
- 200 or more
- N/A my organization has not turned away or wait listed anyone in the last year

9. If you answered yes to question 7 above, please provide additional detail to help us understand the gap in services. Information on the type of service or housing that was requested, the number of individuals that were unable to be served, and the reason service could not be provided.

10. To help us better understand what additional resources organizations need to provide services and housing, please provide additional information on the amount of additional funding your organization needs to meet current demand. Any additional information that you can provide on how this funding would be used by your organization would be beneficial.

11. Please provide any other information or feedback that would help the City identify projects and services for this new federal funding.

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Appendix F

Organizations Consulted by Qualifying Population Type

Organizations Consulted by Qualifying Population Served Type									
Health Service Provider	Homeless Service Provider	Domestic Violence Service Provider	Veteran Service Provider	Public Housing Agencies	Fair Housing Agencies	Civil Rights Agencies	Persons With Disabilities Service Provider	Children & Youth Service Provider	Senior Service Provider
Bert Nash Community Health Center*	United Way of Kaw Valley	Family Promise of Lawrence*	Lawrence-Douglas County Housing Authority*	Lawrence-Douglas County Housing Authority*	Tenants to Homeowners	Kansas Holistic Defenders	Lawrence Community Shelter*	Kansas Department for Children & Families-Lawrence	Senior Resource Center-Douglas County
DCCCA, Inc.	Family Promise of Lawrence*	The Sexual Trauma & Abuse Care Center			Family Promise of Lawrence*		United Way of Kaw Valley	DCCCA, Inc.	
Indian Health Service	Lawrence Community Shelter*	The Willow Domestic Violence Center*			Independence Inc.		Independence Inc.	Ballard Center	
	Bert Nash Community Mental Health Center*	Kansas Department for Children & Families-Lawrence			Kansas Holistic Defenders			Big Brothers Big Sisters of Douglas County	
	Douglas County Health, Housing, & Human Services							Centro Hispano Resource Center of Lawrence	
	Kansas Department for Children & Families-Lawrence							Family Promise of Lawrence*	

*CoC Organization

Appendix G

Public Comments

Caitlyn Dolar

From: Phil Bollinger <KELLPHILBO@msn.com>
Sent: Saturday, February 11, 2023 9:07 AM
To: Caitlyn Dolar
Subject: Home-ARP

External Email. Be careful with links and attachments.

- City of Lawrence IT Helpdesk

Greetings, concerning the issue of housing, as we all know the rental housing affordability is the root of many of the housing problems in Lawrence. I am a senior on a fixed income and it won't be long before I too will be among the homeless numbers. I have lived in Lawrence going on 5 years and every year my landlord has increased my rent, he states that after a market comparison analysis he noted he was far below what he could be charging for rent, so every year he closes that gap at my expense. Let me add that in the nearly 5 years of rent increases, the Landlord has yet to do one upgrade to my unit. I am not alone in this rent trap. In my humble opinion, requiring Landlords to accept Vouchers would fix a majority of the Rental problems in Lawrence. Landlords are raising rents and squeezing Seniors and Low Income Families out into the cold. By requiring Voucher acceptance, will in turn allow more funds from the Home -ARP program to be used to help combat the Homelessness in Lawrence. It all starts with the Voucher system.

From: Daniel Poull <dpjp8@yahoo.com>
Sent: Monday, August 28, 2023 4:10 PM
To: Housing Initiatives Division <HousingInitiatives@lawrenceks.org>
Subject: Homelessness issues survey

External Email. Be careful with links and attachments.

- City of Lawrence IT Helpdesk

To the City of Lawrence, KS,

Thank you for publishing the HOME-ARP plans for dealing with the homelessness in our city and county.

I agree with the findings that providing adequate shelter for those experiencing homelessness is the highest priority. After that, there is a fundamental need to discover who the actual people are that are unhoused and how each of those individuals came to be in their present situation. How many of those experiencing homelessness became unhoused while living in Lawrence/Douglas County? How many people have been transported here from other cities or states by law enforcement agencies? How many people experiencing homelessness are drug addicted and/or mentally ill? We need to know the makeup of this population.

I am of the opinion that the City of Lawrence, especially citizens living near the downtown, are being asked to support a homeless population that is too large for a city of 100,000 people.

We are at a point where some of those experiencing homelessness are making public spaces undesirable with trash, aggressive behavior, theft, and illegal and unhealthy camp sites.

I appreciate any and all efforts to improve this situation.

Sincerely,
Daniel Poull
821 Ohio
Lawrence, KS
785-393-0364

From: [Carol Supancic](#)
Sent: Thursday, August 31, 2023 1:41 PM
To: [Housing Initiatives Division](#)

External Email. Be careful with links and attachments.

- City of Lawrence IT Helpdesk

Lawrence should spend the money on a mental facility and staffing to take care of the mental. the rest of the homeless issue could be solved by lowering property tax. we own rentals and never raise the rent on them unless someone moves and then we may raise the rent on that property. now that the cap has been removed and property tax went up 50% and continues to rise, we are forced to raise the rent on all properties to pay the property tax. eventually this will cause more homelessness until we are all homeless.

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