



# City of LAWRENCE Massachusetts

Mayor Brian A. DePeña

## HOME-ARP ALLOCATION PLAN

---

Office of Planning & Development



*Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, American Rescue Plan Act of 2021 which provides \$5 billion to assist individuals or households who are homeless and other vulnerable populations to reduce homelessness and increase housing stability across the country.*

---

## TABLE OF CONTENTS

Introduction.....	3
Consultation & Engagement .....	4
Public Participation .....	13
Needs Assessment & Gaps Analysis.....	15
Eligible Activities.....	31
HOME-ARP Refinancing Guidelines.....	34
Housing Production Goals .....	34
Preferences .....	35
Conclusion .....	36

# Introduction

The American Rescue Plan (ARP) was signed into law on March 11, 2021, which provided federal funding to relieve the impact, aid recovery, and address long-term recovery because of the impacts of COVID-19. Congress appropriated \$5 billion specifically to address the need for homelessness assistance and supportive services to be administered through U.S. Department of Housing and Urban Development (HUD) existing HOME Investment Partnerships Act (HOME) Program. The City of Lawrence, Massachusetts (City) was allocated \$ 3,174,052 million in a grant called the Home Investment Partnerships Grant American Rescue Plan (HOME-ARP). The purpose of the HOME-ARP funds is to provide homelessness assistance and supportive services through several eligible activities.

*HOME-ARP funds are limited to the activities:*

1. Development and support of affordable housing
2. Tenant-based rental assistance (TBRA)
3. Provision of supportive services
4. Acquisition and development of non-congregate shelter units

*HOME-ARP funds assist "qualifying populations":*

1. Sheltered & unsheltered homeless
2. Currently housed populations at risk of homelessness
3. Fleeing or attempting to flee domestic violence or human trafficking
4. Other families requiring services or housing assistance or to prevent homelessness
5. Those at greatest risk of housing instability or in unstable housing situations

The City has developed and will submit an Allocation Plan, which describes the distribution of HOME-ARP funds and identifies any preferences for eligible activities. The development of the HOME-ARP Allocation Plan must be informed through stakeholder consultation and community engagement. This Plan was developed in accordance with federal regulations and the guidance contained in Community Planning and Development Notice CPD-21-10.

This plan outlines and describes how the City determined priorities including:

- 1) Consultation and public participation processes
- 2) Needs assessment of the qualifying populations
- 3) Gaps in local housing, shelter inventory, and service delivery systems
- 4) Planned uses and eligible activities
- 5) Housing production goals

---

## **Consultation & Engagement**

The Allocation Plan (Plan) was prepared in consultation with agencies whose clientele includes HOME-ARP qualifying populations and public participation processes. In the development of the Plan, Lawrence engaged with stakeholders and asked for input concerning the HOME-ARP grant, eligible activities, and the proposed budget. The City solicited feedback to identify unmet needs and gaps in housing or service delivery systems. An evaluation of service providers determined the HOME-ARP eligible activities currently taking place within the City's jurisdiction and potential opportunities for administering HOME-ARP. The City engaged with the Continuum of Care (CoC),

homeless and domestic violence service providers, veterans' groups, public housing agencies ("PHAs"), public agencies that address the needs of the qualifying populations, and public/private organizations that address fair housing, civil rights, and the needs of persons with disabilities. Lawrence also deployed a HOME-ARP provider survey for community partners to give their input on how to utilize HOME-ARP funds and on the needs and challenges that arise when working to address homelessness and housing instability. Lawrence will continue to meet with stakeholders, including consumers, throughout the implementation of the HOME-ARP activities to assess the ongoing needs of stakeholders and clients. The City will collaborate to develop and implement projects that will address the prioritization of populations and activities.

Please see Appendix I for organizations contacted and methodology for engagement. A summarization of the consultation process and results is referenced throughout the Plan.

The responses from one-on-one sessions, survey respondents, and primary data review were the basis for determining the City's proposed HOME-ARP activities, uses of funds, and the creation of the Plan.

### **Provider Survey**

A survey was distributed both via email and in-person to providers which sought agencies' input on accessibility and availability of eligible activities for qualifying populations. A copy of the survey template and summarization of results is attached as

Appendix II. The focus of both accessibility and availability of services, housing, and shelter was evaluated to ensure the whole spectrum of service delivery was considered. The distinction below addresses the definitions used for each:

- **Accessibility:** A client may be *eligible* for a program, service, or housing but *cannot access* whether due to a language barrier, criminal background, physical limitation, lack of transportation, poor credit, limited income, etc.
- **Availability:** The number of clients seeking the program, service, or housing *exceeds the number* of available units, openings, etc.

Results for the provider survey are summarized throughout the Plan in the Gaps & Needs Assessment.

### Targeted Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

- CoC(s) serving the jurisdiction's geographic area,
- Homeless service providers,
- 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

A list of service providers which completed the survey in accordance with the minimum requirements is attached as Appendix III. Further targeted engagement was carried out with regional partners and outlined below.

### **Continuum of Care (CoC)**

The City's technical consultant will be meeting with the CoC to discuss the HOME-ARP Allocation Plan and provide information on upcoming opportunities for engagement and consultation. Feedback will be incorporated into the Plan.

### **Domestic Violence Service Provider**

A provider survey was issued to the YWCA. The City's technical consultant expects to discuss the challenges and needs of this qualifying population. Feedback will be incorporated into the Plan.

### **Legal Aid Service Provider**

A provider survey was issued to the legal aid provider. The City's technical consultant expects to discuss the challenges and needs of qualifying populations. Feedback will be incorporated into the Plan.

### **McKinney-Vento School Liaison – 2/21/23**

It is reported that the District currently lists 94 homeless families totaling 149 students which are registered as “homeless” under the Act. The school department provides transportation to these homeless students, however, some families are placed out of the City sometimes up to two hours away and students have to transfer schools.

In Lawrence, the schools are extremely overcrowded. The district is actively expanding its buildings through the MSBA program.

There are a variety of reasons students and their families end up homeless. Some include:

- Unaffordable rents
- Lack of shelter for single male parents – they get referred outside of the city

Some special populations, including undocumented families and unaccompanied youth, face unique challenges. Unaccompanied minors age out of foster care/group homes or have family issues where they have been asked to leave or chose to live on their own. Undocumented families are currently tripling up in housing units. Entire families are renting a room. Many have shared utilities with no internet access which was a huge challenge during distance learning due to COVID. Many doubled or tripled up households are not on the lease and are eventually forced to move elsewhere.

There is a need for transitional housing for homeless youth. And challenges for families include document requests for affordable or housing authority units which, in some cases, cannot be produced or easily accessed.

The School Department has a robust list of referrals for homeless or struggling families. There is a mobile market run by the food bank that comes monthly through the Greater Lawrence Family Center. The City has also set aside ARPA funds to provide food and clothing to struggling families. They receive clothing from local community agencies. Families can receive uniform vouchers from an agency out of Haverhill. The schools have

a “Katie’s Closet” which provides toiletries and sanitary products. The City also operates “Project Home Again” which provides families moving into permanent housing with new furniture by referral only. Lazarus House through their “Project Bethlehem” along with the Dario Foundation provide Christmas gifts and funding for afterschool programs. The school department also provides referrals for parents to partake in English Language Learning (ELL) courses and are referred to Lawrence Community Works for financial literacy programs. Uninsured students and families are referred to low or no cost resources. The High School has an onsite clinic run through the Greater Lawrence Family Health Centers. There are also free dental clinics held for lower income families and individuals.

Although there is support in place, the root causes disrupting families still need to be addressed. Ultimately, the need for affordable, low-barrier housing is a solution.

### **Public Housing Authority – 3/2/23**

The technical consultant met with the Housing Authority to review the portfolio and discuss challenges, barriers, gaps, and needs for tenants in the city. The Housing Authority has a lease rate/occupancy rate of 98% in Public Housing and administers 988 vouchers. They receive just over \$3.5 M in capital funds from HUD which is not enough for operating and capital needs. There have been no RAD conversions to date but are exploring the option on one of the oldest housing developments constructed in 1942. The family unit wait list is currently closed, when the wait is over 5 years, the list is closed to new applicants. The current wait is anticipated to be approximately 10 years, they are housing people right now that applied in 2010 and 2011. It takes about seven

years for Elderly/Disabled units to become available. The Housing Authority maintains public housing which is 100% occupied and 10% of all units are ADA compliant. Vouchers do not cover enough of the rent for holders to afford market rate apartments. It is taking much longer for voucher holders to find apartments before it would take 30-60 days it is now taking up to 120 days for voucher holders to find units. The Authority had to lower distribution on vouchers to remain within budget due to high rents which is a barrier as there has been an increase in demand due to the unaffordability of rental units.

A summarization of the Housing Authority's portfolio will be included as a final appendix attachment.

2023 Fair Market Rent (FMR) for the following unit sizes:

Efficiency	1-Bed	2-Bed	3-Bed	4-Bed
\$ 1,188	\$ 1,377	\$ 1,776	\$ 2,162	\$ 2,386

[https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2023\\_code/2023summary.odn](https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2023_code/2023summary.odn)

Challenges and barriers reported include voucher holders having issues finding units because of competition with market rate renters with no restrictions. The quality of the units available will not pass inspection. The City does have a security deposit program that helps tenants. Onboarding someone into the voucher program and getting connected with services they need is a challenge. It is easier to maintain services with on-site developments and tenants.

## **Greater Lawrence Family Health Center – 2/15/23**

*Ryan Dono MD, Health Care for the Homeless Program - Medical Director*

The mission of Greater Lawrence Family Health Center is to improve and maintain the health of individuals and families in the Merrimack Valley by providing a network of high quality, comprehensive healthcare services and by training healthcare professionals to respond to the needs of a culturally diverse population. Striving to meet the medical needs of everyone in the community, GLFHC offers the only federally funded Health Care for the Homeless Program in the Merrimack Valley. GLFHC's Health Care for the Homeless program (HCH) serves over 1,100 patients at community-based sites across the Merrimack Valley. The medical team provides primary healthcare directly to this patient population at shelters, drop-in centers, and soup kitchens for health issues ranging from diabetes to depression and exposure to the elements. In addition to providing primary healthcare, staff also assist in securing medications, health insurance, and directing homeless patients towards local resources for food, emergency shelter, permanent housing, and job training.

The Medical Director identified barriers and gaps to the following populations:

**1. Unsheltered**

- a. Access to shelter, warming centers, and transitional housing

**2. Sheltered**

- a. Access to beds – there are rarely open beds available to this population

**3. Housing Instability**

- a. Rent exceeds income, rent burdened
- b. Larger unit sizes are not available or too expensive, so families are doubling and tripling up.

The community would benefit from a coalition or advocacy group to centralize operations and access to resources.

This Community Health Needs Assessment (CHNA) process, along with the planning activities that were conducted to develop the associated Implementation Strategy (IS), were jointly sponsored, and implemented by Lawrence General Hospital (Lawrence General) and the Greater Lawrence Family Health Center (GLFHC). Community Health Survey respondents reported in the CHNA that the number one response to improve in their community was, "more affordable housing".

## 2022 Greater Lawrence Community Health Needs Assessment



*Lack of affordable housing and poor housing conditions contribute to a wide range of health issues, including respiratory diseases, lead poisoning, infectious diseases, and poor mental health. At the extreme are those without housing, including those who are homeless or living in unstable or transient housing situations. They are more*

*likely to delay medical care and have mortality rates up to four times higher than those who have secure housing. Adults who are homeless or living in unstable situations are more likely to experience mental health issues, substance use, intimate partner violence, and trauma; children in similar situations have difficulty in school and are more likely to exhibit antisocial behavior. Individuals who participated in the assessment's interviews, focus groups, and listening sessions reflected on the tremendous burden that the high cost*

*of housing places on people, limiting their ability to afford nutritious food, utilities, and other essentials of daily living. This burden also forces many residents to work long hours or work multiple jobs, which can have a major impact on one's quality of life and limit their ability to properly support their family or friends.*

---

## Public Participation

In accordance with Lawrence's Citizen Participation Plan (See Appendix IV) and to give reasonable notice and an opportunity to comment, Lawrence will solicit public input to both solicit input into the development of the Plan (Consultation); and seek comment on the draft Plan (Public Participation).

On March 1, 2023, a notice regarding the public comment period of the draft HOME-ARP allocation plan was published in the *Eagle Tribune*. The Plan is a guide to the City's eligible activities, qualifying populations, preferences, and programs, for meeting local housing needs and goals. The Plan will be made available for public review on March 1, 2023, both online at [www.cityoflawrence.com](http://www.cityoflawrence.com) and in hard copy format at the office location Monday through Friday from 8:30 A.M. to 4:30 P.M.

Written comments should be addressed to City of Lawrence, Office of Planning & Development, 12 Methuen Street, Lawrence, MA 01840, **Attention:** Awilda Pimentel, or emailed to [awilda.pimentel@cityoflawrence.com](mailto:awilda.pimentel@cityoflawrence.com). All written comments received prior to 4:30 PM on Monday, March 20, 2023.

The Public Hearing will be open to residents to learn more about the Plan and provide feedback. Hearings will be conducted by the City of Lawrence Office of Planning & Development at The Center, 155 Haverhill Street, Lawrence, MA 01841.

- 1) Thursday, March 9, 2023, at 11:30 a.m.
- 2) Thursday, March 9, 2023, at 5:00 p.m.

To request reasonable accommodation, including an interpreter, for this meeting or to ask questions, please contact Awilda Pimentel.

**Email:** awilda.pimentel@cityoflawrence.com

**Phone:** 978-620-3510

To broaden public participation, additional outreach was conducted via email and social media. In the public notice, the City specified accommodation and interpretation for anyone needing support in order to fully participate in the public hearing. The public hearings will both be in-person. The in-person meeting location is served by public transportation and is ADA accessible. The City offered a variety of avenues for members of the public to participate in by commenting on the draft plan. These included mail and email options for written comments, telephoned comments, and to comment orally at the scheduled public hearing.

### **Public Networks**

Surveys were also distributed to key agencies that aid the City's homeless, those at risk of homelessness, and others in the qualified populations identified by the U.S. Department of Housing and Urban Development. The Public Hearing will consist of a 15-

minute presentation, an open forum for public comment, questions and answers from City staff and technical consultant.

### **Consumer Engagement**

Over 230 members of the public submitted responses to the survey request for feedback on affordable housing. The results are included in the Appendix and outcomes are incorporated throughout the Plan.

### **Summary of Comments**

**Written:** Any written comments received will be recorded here.

**Public Hearing:** Any public comments received will be recorded here.

In the event any comments are rejected or not incorporated, narrative will outline an explanation.

[All written and oral comments are expected to be accepted]

---

## **Needs Assessment & Gaps Analysis**

The assessment examines the size and composition of qualifying populations within Lawrence and surrounding areas, identifies available resources, evaluates unmet housing and services needs of these populations, and addresses existing gaps. The City has highlighted gaps within its current shelter and housing inventory, as well as the service delivery system. In the needs assessment and gaps analysis, Lawrence used

current data, including Comprehensive Housing Affordability Data (CHAS), 2022

Massachusetts Balance of State CoC Point in Time Count (PIT Count), 2021 CoC Housing Inventory Count (HIC), and other available data sources.

## SIZE AND DEMOGRAPHIC COMPOSITION OF QUALIFYING POPULATIONS

An overview of Lawrence's demographics lays a foundation for context of the size and demographic of the qualifying populations.

Lawrence has a total city population of 89,143 with the following further breakdown of key demographics.

White/ Caucasian	Black/African American	Asian	Native Hawaiian	American Indian	Other	Two or More	Hispanic/ Latino
17,837	4,861	1,684	60	1,290	45,475	17,936	72,902

<https://data.census.gov/>

Population Increase/Decrease (Since 2010)	Poverty Rate	Families in Poverty	Highest Population Age Cohort	Population 65+	% Population 65+ living in Poverty	Median Income
+16.67%	17.1%	15.70%	25-34	9,377	30.53%	\$ 49,087

HUD requires HOME-ARP funds be used to primarily benefit individuals and families in specified HOME-ARP “qualifying populations.” Qualifying populations include, but are not limited to, the following:

## **SHELTERED AND UNSHELTERED HOMELESS POPULATIONS**

- Those currently housed populations at risk of homelessness
- Those fleeing or attempting to flee domestic violence or human trafficking
- Other families requiring services or housing assistance or to prevent homelessness
- Those at greatest risk of housing instability or in unstable housing situations

## **HOMELESS POPULATIONS**

---

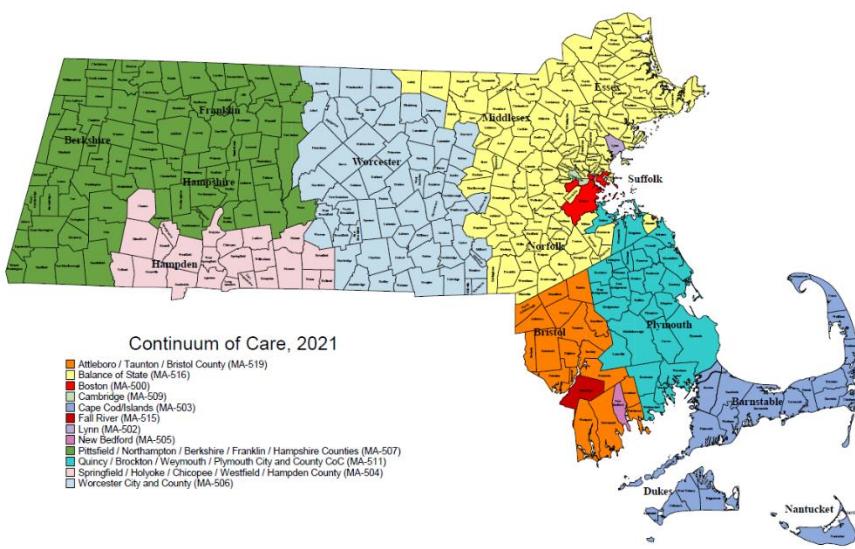
In accordance with HUD’s definition of homeless for the HOME-ARP grant under 24 CFR § 91.5, Lawrence will consider a homeless family or individual to include:

*An individual or family who lacks a fixed, regular, and adequate nighttime residence*

1. An individual or family who lacks a fixed, regular, and nighttime residence as defined in 24 CFR § 91.5
2. A person or family who will imminently lose their primary residence within 14 days from the date of application for assistance with no subsequent residence identified and lacks resources or support networks
3. Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition but who qualify under 24 CFR § 91.5

4. Any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, has no other residence, and lacks the resources and family networks

The amount of people estimated to be experiencing homelessness may be underrepresented due to COVID-19, the following information includes the basis for the needs assessment and gap analysis for HOME-ARP qualified populations based on the latest available data. The HUD 2022 Massachusetts Balance of State Continuum of Care Homeless Assistance Programs Housing Inventory Count Report and 2022 Point-in-Time Count are both included as **Appendix VI & VII** respectively.



### Point-in-Time Count 2022

The most recent available PIT, 2022, reveals a decline from 2020 in the unsheltered individual and family populations yet showed an *increase* in the sheltered individual and family populations.

According to the Point-in-Time count, there were no families identified to be unsheltered in 2022. However, there were over 190 families that were reported to the City as doubled up and/or couch surfing which is considered unsheltered under McKinney-Vento. The unsheltered population cannot be compared to 2021 previous

years' results as a different methodology was implemented due to safety concerns over COVID-19. The unsheltered data is managed by professional outreach teams who are familiar with this population and engage with them year-round. The method employed provided accurate data on demographics, disabling conditions, and chronic homelessness since it is entered and verified by outreach staff throughout the year. Given the restrictions in the HUD reporting requirements for the unsheltered, it is likely that these numbers are often under-representations of this population in the PIT.

Between 2007 and 2020, Massachusetts Balance of State Continuum of Care total homeless population changed by an increase of 61%, the sheltered population increased by 46%, and the unsheltered population increased by 331%. According to the National Alliance to End Homelessness, the Balance of State of Massachusetts's estimated number of individuals experiencing homelessness, as of 2020, is **2,961**.

<https://endhomelessness.org/homelessness-in-america/homelessness-statistics/state-of-homelessness-dashboards/?State=Massachusetts>

Sources: US Department of Housing and Urban Development, US Census Bureau

## Massachusetts Balance of State CoC

**2,961**

People Homeless on a Given Night in 2020

**22.3**

Homeless Per 10,000 People in the General Population

---

*An individual or family who has an annual income below 30 percent of median family income for the area and does not have sufficient resources or support networks.*

---

## **INDIVIDUALS AND FAMILIES AT RISK OF HOMELESSNESS & RESIDENTS LIVING IN HOUSING INSTABILITY OR IN UNSTABLE HOUSING SITUATIONS**

Individuals and families experiencing housing instability is a complex problem. It results in a variety of issues including frequent house shifting, trouble paying rent, overcrowding,

living with relatives, and homelessness. In addition to being low-income without available resources, individuals, and families, according to the definition, also meet one of the following conditions, as per 24 CFR § 91.5:

1. Has moved 2 or more times in the 60 days immediately preceding the application for homeless prevention assistance because of economic hardship. Or Is living in the home of another because of economic hardship
2. Has been notified in writing that their housing or living situation will be terminated withing 21 days after the date of application for assistance
3. Lives in a hotel or motel without receiving assistance through a program for low-income individuals
4. Lives in a single-room occupancy (SRO) or efficiency where more than two persons reside or lives in a larger housing unit with more than 1.5 per room
5. Leaving a publicly funded institution or system of care
6. Lives in housing that has characteristics associated with instability

HOME-ARP qualifying populations also include other populations who have previously qualified as homeless, are currently housed with temporary or emergency assistance, and who need additional housing assistance or supportive services to avoid a return to homelessness. In addition, HUD defines those at greatest risk of housing instability as households that have an annual income less than 30% AMI and are experiencing severe cost burden or have an income less than 50% AMI and meet a certain condition, like living in someone else's home or living in a hotel due to an economic hardship.

Location	Occupied Housing Units	
Lawrence	30,366	
Massachusetts	2,759,018	
Location	Vacancy Rate	
Lawrence	1.90%	
Massachusetts	4.00%	
Location	% Renters	% Owners
Lawrence	71.20%	39.00%
Massachusetts	36.80%	63.20%

Average Rent	
LAWRENCE	\$ 1,924
MASSACHUSETTS	\$ 2,500

The information brings context to the housing instability throughout the city and county. Lawrence is predominantly a renter's market with very low vacancy rates. This creates an unstable environment for

individuals and families with unstable housing situations. There are few options for mobility and exiting homelessness or an unstable environment to housing is limited.

The median income in Lawrence is \$ 49,087 which, in comparison to the average rent, results in an unstable environment for renters who may be cost burdened, cannot afford a

Type	Mod-Severe Cost Burden	Severely Cost Burdened
Renter	9,400	5,110
Owner	2,650	1,375

large expense, or accommodate a crisis. The Comprehensive Housing Affordability Strategy ("CHAS") data summary level created on February 8, 2023; Lawrence City, Massachusetts generated from the 2015-2019 ACS is included as **Appendix VII**. The cost burden is the ratio of housing costs to household income. A "moderate cost burden" is defined by HUD as gross housing costs between 31% and 50% of gross income. A "severe cost burden" is defined as gross housing costs exceeding 50% of gross income. (For renters, gross housing costs include rent paid by the tenant plus utilities. For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes.

Demographic	Rent	Own	TOTAL
Household Income <= 30% HAMFI	7,285	970	8,255
Household Income >30% to <=50% HAMFI	3,990	1,070	5,060
Household Income >50% to <=80% HAMFI	3,590	1,655	5,245
Cost Burden <=30%	5,380	890	6,270
Cost Burden >30% to <=50%	3,125	830	3,955
Cost Burden >50%	895	930	1,825

## FLEEING OR ATTEMPTING TO FLEE DOMESTIC VIOLENCE OR HUMAN TRAFFICKING

For HOME-ARP, this population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. It includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime

residence or has made the individual or family afraid to return or remain within the same dwelling unit.

## OTHER POPULATIONS

OLDER ADULTS				
City/Town	Population 65+	% Population 65+ living in Poverty		
Lawrence	16,131	17.40%		
DISABILITY				
City/Town	Elderly	Non-Elderly		
Lawrence	4,737	8,151		
VETERANS				
City/Town	All Veterans	White	Black or African American	White, Non-Hispanic/Latino
Lawrence	1,035	618	0	544
CITIZENSHIP				
City/Town	Naturalized	Non-Citizen		
Lawrence	16,100	23,458		

The complete workbook of demographic data is included [Appendix IX](#).

## UNMET HOUSING AND SERVICE NEEDS OF QUALIFYING POPULATIONS

Many of the needs of the qualifying populations are similar and include the need for a flexible response system, available housing that is affordable, wraparound services, and supportive services or assistance that could prevent homelessness or greater housing instability.

The following reviews the needs of each qualifying population.

- Sheltered and unsheltered homeless populations;
- Those currently housed populations at risk of homelessness;
- Other families requiring services or housing assistance or to prevent homelessness; and,
- Those at greatest risk of housing instability or in unstable housing situations

Survey respondents of Lawrence providers indicated the following rank of need within the current delivery system (1 being greatest, ranking to least need):

1. Chronically Homeless
2. Imminent Homeless
3. At-Risk of Homelessness
4. Temporary Housing
5. Housed but Unstable
6. Housed with Subsidy
7. Transitional Housing
8. Permanent Supportive Housing

## HOMELESS POPULATIONS

Unsheltered populations experience a wide range of needs disproportionately impacting their health and wellbeing which include immediate issues such as:

- Exposure to weather, extremes in temperature
- Lack of access to healthcare
- Social isolation
- Inadequate management of pre-existing health conditions
- Unstable basic needs – lack of access to food and hygiene

To address the need of the unsheltered populations, service providers must prioritize rapid response, access, and availability of beds. Long-term needs include ensuring that housing is low barrier, removing as many conditions such as employment, income, criminal record, treatment, or sobriety, as possible. Often even more vulnerable, a subpopulation of the homeless qualified population is those who are chronically homeless. These are usually individuals who lack a fixed, regular, and adequate nighttime residence for extended periods of time. Chronically homeless individuals live in a place not meant for human habitation or living in an emergency shelter over a year, or on at least 4 separate occasions of homelessness in the last 3 years. These individuals typically need affordable housing assistance with long-term support services that are designed to build independent living and tenancy skills and connect people with community-based health care, treatment, and employment services.

The City recognizes the need to expand access to deeply affordable housing, low-barrier housing and rapid rehousing, including supportive services, to serve this population. Any

housing option must be flexible, client centered, accessible and combined with wraparound support necessary to help clients remain in permanent, safe housing. Gaps are reflected in the FY2021 - Performance Measurement Module (Sys PM) included in **Appendix X**.

## **INDIVIDUALS AND FAMILIES AT RISK OF HOMELESSNESS**

Individuals and families at risk of homelessness may need housing assistance that could vary from eviction assistance, diversion assistance, or rent and utility assistance in addition to other types of supportive services. Households who need assistance with maintaining or finding housing to prevent homelessness will benefit from services assist individual and families at risk of homelessness include

- Short-term subsidies
- Security deposits and first month's rent
- Case management services
- Landlord/Tenant mediation or education services

## **FLEEING OR ATTEMPTING TO FLEE DOMESTIC VIOLENCE OR HUMAN TRAFFICKING**

The shelter utilization is always full, and in some instances, was over capacity. The pandemic resulted in a rise in shelter needs while simultaneously limiting space available in shelter due to public health and spacing guidelines. Creating better access to short-term shelter and housing as well as increasing the supportive services available could help stabilize this qualifying population.

## **RESIDENTS LIVING IN HOUSING INSTABILITY OR IN UNSTABLE HOUSING SITUATIONS**

Residents who have been previously homeless or are currently using some type of rental assistance may need the assistance to continue for a short or long period of time.

Funding existing services and housing assistance programs is important to the housing stability of these individuals and families. In addition, the City of Lawrence and surrounding region has a lack of quality affordable housing available for residents in need causing cost burdens leading to housing instability. There is also a need to assist residents living in unstable housing situations increase their income, build savings, and acquire assets through additional supportive services in the community. The HOME-ARP Consultation Survey found that fair housing barriers, barriers for persons with disabilities, and language barriers often impact the housing options available to these qualifying populations.

## **CURRENT RESOURCES AVAILABLE TO ASSIST QUALIFYING POPULATIONS**

The City of Lawrence receives an annual allocation of almost \$2.5 million in federal formula grant Funding, including the Community Development Block Grant (CDBG), the HOME Investment Partnerships (HOME) Grant. Lawrence utilizes funding to assist families with obtaining affordable homes, supportive services, rental assistance, emergency shelter and other services. These services can and often benefit qualifying populations. For instance, although the City uses CDBG to fund public services to the greatest extent possible, which can help stabilize individuals and families by providing services like healthcare, childcare, job training, and homeless services, there is a cap of 15% of the total grant amount of CDBG that can be used for public services. The City works with community partners to leverage resources and build up systems to serve

residents. Housing and Homeless Services can be accessed through community providers across the state who work with eligible heads of households and individuals experiencing homelessness. Persons are prioritized for housing services based on an assessment completed by the City's homelessness services team.

### **GAPS IN CURRENT SHELTER, HOUSING INVENTORY & SERVICE DELIVERY SYSTEM:**

The following information was pulled from survey respondent's narrative responses:

SYNTHESIS OF TRENDS IN SURVEY FEEDBACK			
BARRIERS		CHALLENGES	
GAPS		NEEDS	
- Language barriers, fear of non-documentation, jobs that pay enough to sustain living with housing and food, better health insurance, functioning school systems	- Affordable housing for elders, those with disabilities, including mental health, housing for low-income residents	- The minimum wage is not a living wage so affordable housing should be something that can be paid by a single person with minimum wages	- Landlords are disproportionately increasing rent dues to the point that it is impossible for a typical family to afford them
- There is not enough transitional funds and emergency assistance, landlord-tenant mediation and eviction prevention services, affordable childcare and transportation, mental health care, substance abuse prevention and intervention, and lead-free, energy-efficient housing availability		- Affordable housing needs to be available that does not restrict one's ability to obtain other basic human rights such as food, clothing, health care, transportation, etc.	- Greatest needs exist for those homeless and at-risk of homelessness

## **PRIORITY NEEDS FOR QUALIFYING POPULATIONS**

HOME-ARP qualifying populations often have many competing needs. In the HOME-ARP Consultation Survey, stakeholders indicated a variety of needs for qualifying populations, including 1) housing, such as shelter, short-term housing, permanent supportive housing, and rental and utility assistance, and 2) supportive services, such as medical care, counseling, substance abuse service, case management, childcare, transportation, legal services, and job training. The needs overlap but also vary amongst these populations, and the following information covers the priority needs for each of the qualified populations.

The focus is long-term to foster resiliency amidst the most vulnerable populations. As a result, Lawrence recognizes the need to prioritize the creation and rehabilitation of deeply affordable, low-barrier, accessible rental housing to address the aging and disabled populations.

Families and individuals who are very or extremely low-income require a wide range of services and support to remain stably housed. Responses on system gaps and strategies to address issues consistently identified through these efforts and reinforced with the data in this document included:

1. Increasing the supply of available affordable housing and to the most vulnerable populations
2. Expanding supportive services to help vulnerable populations access housing and remain stably housed

All four of the qualifying populations would benefit from an increased number of affordable housing units and increased affordability in the housing market. High rent, limited availability, and lack of accessibility results in increased instability among cost burdened and low-income renters and those at risk of homelessness. The lack of affordable rental units and permanent supportive housing causes a bottleneck in the availability of safe housing options, creating longer episodes of homelessness and leading to fewer households becoming stably housed overall. The greatest need and area to address homelessness is deeply affordable housing.



**Increase Supply:** The Homeless and Housing Inventory and Gaps Analysis included above shows significant gaps in the supply of affordable housing available to households earning 50% of AMI or below. Even when homeless or at-risk households have access to resources like rental assistance vouchers or emergency rental assistance, many of them are unable to find an available unit in their price range or a landlord willing to accept subsidies or “high-risk” renters. To address this need, Lawrence will dedicate a portion of its HOME-ARP funds to producing accessible and affordable housing for eligible populations, particularly extremely low-income and homeless households. These resources will be available to acquire, produce, and preserve housing.

**Expand Services:** Organizations providing supportive services to families and individuals who are homeless or at risk of homelessness are already facing a critical shortage of staff to meet the increasing needs of these vulnerable populations. Without supportive

services, many households are unable to sustain housing and landlords are often less likely to serve these populations without these kinds of wrap-around services in place. The City intends to dedicate a portion of HOME-ARP funds to expand supportive services for eligible populations, divert households from homelessness by addressing emergency costs that could result in the loss of housing, and leverage additional federal resources that can sustain this work over the long-term.

---

## **Eligible Activities**

### **METHODOLGOY FOR SOLICITING APPLICATIONS, SELECTING DEVELOPERS, AND/OR SERVICE PROVIDERS**

As with HOME funds, HOME-ARP funds will promote public/private partnerships as a vehicle for preserving and expanding the stock of affordable housing. HOME-ARP funds may be leveraged with private and public funding sources to support activities for supportive services, tenant-based rental assistance, and the development of non-congregate shelters. Lawrence will continue to support eligible activities through partners, like the Housing Authority and other agencies, to assist very low-income households. The lack of inventory and beds within the delivery system is a constraint in housing and addressing the complex issues across the spectrum of the qualified populations in Lawrence.

The City cannot anticipate all available public or private funds but will ensure known or future funds are maximized to leverage the use of any such resources as they become available. HOME-ARP funds will be awarded to City departments or nonprofit or for-

profit organizations, based on the merit of proposals received prior to or during the grant implementation period. For development activities and supportive services, greater preference is given to proposals that have other sources of equity and financing and are in line with Lawrence's priorities. The locations of activities will be determined after subrecipients are selected. The City will not release funds from the HOME-ARP allocation to a subrecipient prior to HUD's acceptance of the HOME-ARP allocation. Once the allocation plan has been accepted, the City will execute contracts for those who will be awarded.

Planned use of HOME-ARP funding is summarized below.

USE OF HOME-ARP FUNDING			
Activity	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 447,944		
Acquisition/Development of Non-Congregate Shelter	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 2,250,000		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 476,108	15 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 3,174,052</b>		

The budget is an estimate of the expected activities the City will carry out over the life of the HOME-ARP budget period (Sept 30, 2030).

**Supportive Services:** Grant funds may be used to pay the eligible costs of supportive services that address the special needs of the program participants. If the supportive services are provided in a supportive service facility not contained in a housing structure, the costs of day-to-day operation of the supportive service facility, including

maintenance, repair, building security, furniture, utilities, and equipment are eligible as a supportive service. Supportive services must be necessary to assist program participants obtain and maintain housing including, but not limited to, education, childcare, job training, legal services, housing counseling, mental health, and transportation.

**Acquisition and Development of Non-Congregate Shelter:** A non-congregate shelter (NCS) is one or more buildings that provide private units or rooms as temporary shelter to individuals and families and does not require occupants to sign a lease or occupancy agreement. HOME-ARP funds may be used to acquire and develop HOME-ARP NCS for individuals and families in qualifying populations

**Tenant-Based Rental Assistance (TBRA):** HOME-ARP funds may be used to provide tenant-based rental assistance to qualifying households (“HOME-ARP TBRA”). In HOME-ARP TBRA, the PJ assists a qualifying household with payments to cover the entire or insufficient amounts that the qualifying household cannot pay for housing and housing-related costs, such as rental assistance, security deposits, and utility deposits. HOME-ARP TBRA assisted households may choose to rent a unit in a HOME-ARP rental project or any other eligible rental unit. HOME-ARP TBRA is a form of rental assistance that is attached to the household and not a particular rental unit.

**Development of Affordable Rental Housing:** Grant funds may be used to pay development hard costs, the actual cost of reconstructing or rehabilitating housing, related soft costs, and acquisition of real property.

**Non-Profit Operating:** Grant funds, for a selected project, may be used to support the non-profits operations including, but not limited to, salaries, wages, and other employee compensation and benefits; employee education, training, and travel; rent; utilities; communication costs; taxes; insurance; equipment; and materials and supplies.

**Capacity Building Assistance:** Capacity building expenses are defined as reasonable and necessary general operating costs that will result in expansion or improvement of an organization's ability to successfully carry out eligible HOME-ARP activities.

**Administration:** Generally, funds are available for the City of Lawrence's staff salaries, wages, and related costs to implement the HOME-ARP program.

---

## **HOME-ARP Refinancing Guidelines**

The City of Lawrence does not intend to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.

---

## **Housing Production Goals**

It is anticipated that the HOME-ARP allocation will support the creation of affordable housing units for qualifying populations and leverage as many as affordable housing units as possible with available resources, serving households across the service delivery system. The Housing Production Calculation Worksheet will be attached as **Appendix XI**.

---

## Preferences

*[If a PJ is using a Coordinated Entry that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.]*

The City of Lawrence intends to give preference for HOME-ARP funded activities to homeless individuals and families as defined in 24 CFR 91.5 (1). This includes individuals or families who lack a fixed, regular, and adequate nighttime residence. Preference will not be given to specific subpopulations.

Unlike the regular HOME Program, which targets HOME-assisted rental units based on tenant income, 70 percent of all HOME-ARP units will admit households based only upon their status as qualifying households. This complicates the underwriting and operation of projects that include HOME-ARP units. As a result, the requirements for HOME-ARP rental housing provide significant flexibility to enable HOME-ARP rental projects to remain financially viable and affordable for the qualifying populations throughout the minimum compliance period. One of these flexibilities is permitting up to 30 percent of HOME-ARP rental housing units funded by a PJ to be occupied by low-income households.

---

# Conclusion

## Action Items

- Ongoing collaboration with area partners to identify, develop, and implement projects
- Address root cause of housing instability and homelessness – housing.
- Identify barriers to development at a regional level and foster relationships, leverage funds, and incentivize affordable development of non-congregate shelter

While the City intends to give preference to affordable rental housing development and supportive service projects serving those experiencing homelessness, the City intends to coordinate various funding sources to make a holistic investment across the continuum additional opportunities will be made available during the same funding process.

Lawrence received ARPA funds which, in part, are addressing needs which align with the Plan. There is a portion of the ARPA allocation which is also available for housing and may be leveraged, in part, with HOME-ARP. The City's HOME and CDBG annual entitlement funds are allocated and will continue to inform community-wide efforts and initiatives for years to come.

## APPENDIX

- I. Consultation – Overview
- II. Organization Survey – Respondent Results
- III. Lawrence's Citizen Participation Plan
- IV. Public Notice
- V. HUD 2020 Continuum of Care Homeless Assistance Programs Housing Inventory Count Report
- VI. Comprehensive Housing Affordability Strategy
- VII. Demographic Data
- VIII. FY2021 - Performance Measurement Module (Sys PM)

## **Methodology**

In addition to feedback received through surveys and consultation sessions, several data sources and community plans were reviewed to determine the needs, system gaps, and demographics for HOME-ARP qualifying populations.

The data represented throughout the Plan is a compilation of the most recent and publicly available data, including: 2021 Point in Time, the 2015-2019 CHAS and HMIS. This data was primarily utilized to demonstrate housing inventory and demographic data among qualifying populations, where available.

Additionally, data collected from local organizations, service providers and public housing agencies largely informed the identification of gaps in needs, service delivery and possible misrepresentation or undercounting among the above reference data sources. Further consultation with local officials and members of the CoC aided in the identification of unmet needs, primarily in the areas of homelessness and supportive services.

Further needs related to other populations were identified via various reports and case studies including:

- A. HUD Continuum of Care Homeless Assistance Programs Housing Inventory Count Report
- B. Comprehensive Housing Affordability Strategy
- C. FY2021 - Performance Measurement Module (SYS PM)

## Public Hearing:

### [NEWSPAPER PUBLICATION FROM LEGAL AD]

#### **PUBLIC HEARING:**

In compliance with United States Department of Housing and Urban Development (HUD) regulations, the City of Lawrence, Office of Planning & Development will be holding two (2) Public Hearings to receive public comments on the draft HOME-ARP Allocation Plan (Plan).

The City of Lawrence was allocated \$3,174,052 for eligible activities including:

1. Production or Preservation of Affordable Housing
2. Tenant-Based Rental Assistance (TBRA)
3. Supportive Services, including services defined at 24 CFR 578.53(e), homeless prevention services, and housing counseling.
4. Purchase and Development of Non-Congregate Shelter
5. Administrative and Operating Funding

The Plan is a guide to the City's eligible activities, qualifying populations, preferences, and programs, for meeting local housing needs and goals. The Plan will be made available for public review on March 1, 2023, both online at [www.cityoflawrence.com](http://www.cityoflawrence.com) and in hard copy format at the office location Monday through Friday from 8:30 A.M. to 4:30 P.M.

Written comments should be addressed to City of Lawrence, Office of Planning & Development, 12 Methuen Street, Lawrence, MA 01840, Attention: Awilda Pimentel, or emailed to [awilda.pimentel@cityoflawrence.com](mailto:awilda.pimentel@cityoflawrence.com).

All written comments received prior to 4:30 PM on Monday, March 20, 2023.

The Public Hearing will be open to residents to learn more about the Plan and provide feedback. Hearings will be conducted by the City of Lawrence Office of Planning & Development at The Center, 155 Haverhill Street, Lawrence, MA 01841.

- 1) Thursday, March 9, 2023, at 11:30 a.m.
- 2) Thursday, March 9, 2023, at 5:00 p.m.

To request reasonable accommodation, including an interpreter, for this meeting or to ask questions, please contact Awilda Pimentel.

Email: [awilda.pimentel@cityoflawrence.com](mailto:awilda.pimentel@cityoflawrence.com)  
Phone: 978-620-3510

ET - 2/24/23