

# **City of Lancaster, Pennsylvania**

Department of Economic Development and Neighborhood Revitalization

**Fiscal Year 2018**

# **DRAFT** **ANNUAL ACTION PLAN**

For the Period  
January 1, 2018 – December 31, 2018

For Activities Funded by the Following Federal Program:

**COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) AND**  
**EMERGENCY SOLUTIONS GRANT (ESG) PROGRAMS**

**Danene Sorace, Mayor**



**Application for Federal Assistance SF-424**

**\* 1. Type of Submission:**

- Preapplication
- Application
- Changed/Corrected Application

**\* 2. Type of Application:**

- New
- Continuation
- Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

**State Use Only:**

6. Date Received by State:

7. State Application Identifier:

**8. APPLICANT INFORMATION:**

\* a. Legal Name:

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

\* c. Organizational DUNS:

**d. Address:**

\* Street1:

Street2:

\* City:

County/Parish:

\* State:

Province:

\* Country:

\* Zip / Postal Code:

**e. Organizational Unit:**

Department Name:

Division Name:

**f. Name and contact information of person to be contacted on matters involving this application:**

Prefix:

\* First Name:

Middle Name:

\* Last Name:

Suffix:

Title:

Organizational Affiliation:

\* Telephone Number:

Fax Number:

\* Email:

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

**\* 10. Name of Federal Agency:**

Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14.231

CFDA Title:

Emergency Solutions Grant

**\* 12. Funding Opportunity Number:**

14.231

\* Title:

Entitlement Grant

**13. Competition Identification Number:**

Title:

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

Emergency Solutions Grant program

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="139155"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes  No

If "Yes", provide explanation and attach

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:   
Middle Name:   
\* Last Name:   
Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative:

\* Date Signed:

### Application for Federal Assistance SF-424

**\* 1. Type of Submission:**

- Preapplication  
 Application  
 Changed/Corrected Application

**\* 2. Type of Application:**

- New  
 Continuation  
 Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

23-6001904

5b. Federal Award Identifier:

**State Use Only:**

6. Date Received by State:

7. State Application Identifier:

**8. APPLICANT INFORMATION:**

\* a. Legal Name:

City of Lancaster

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

23-6001904

\* c. Organizational DUNS:

0105694570000

**d. Address:**

\* Street1:

120 North Duke Street

Street2:

\* City:

Lancaster

County/Parish:

\* State:

PA: Pennsylvania

Province:

\* Country:

USA: UNITED STATES

\* Zip / Postal Code:

17602-1599

**e. Organizational Unit:**

Department Name:

EDNR

Division Name:

**f. Name and contact information of person to be contacted on matters involving this application:**

Prefix:

Mr.

\* First Name:

Randy

Middle Name:

S.

\* Last Name:

Patterson

Suffix:

Title:

Director, EDNR

Organizational Affiliation:

\* Telephone Number:

717-291-4743

Fax Number:

\* Email:

rpatterson@cityoflancasterpa.com

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

**\* 10. Name of Federal Agency:**

Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14.218

CFDA Title:  
Community Development Block Grant

**\* 12. Funding Opportunity Number:**

14.218

\* Title:  
Entitlement Grant

**13. Competition Identification Number:**

Title:

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

**\* 15. Descriptive Title of Applicant's Project:**

CDBG program funding housing, public improvements, public services, economic development, slum/blight and planning and administrative activities.

Attach supporting documents as specified in agency instructions.

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="1679235"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text" value="50000"/>
* g. TOTAL	<input type="text"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes  No

If "Yes", provide explanation and attach

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

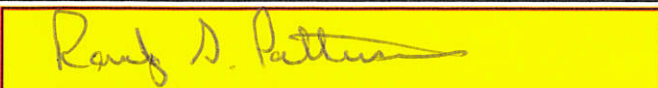
**Authorized Representative:**

Prefix:  \* First Name:   
Middle Name:   
\* Last Name:   
Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:

## CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

**Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

**Anti-Lobbying** -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

  
\_\_\_\_\_  
Signature of Authorized Official

5/25/18  
\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

*Mayor*



## Specific CDBG Certifications

The Entitlement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

**Following a Plan** -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) \_\_\_\_\_, \_\_\_\_\_ (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its

jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

**Compliance With Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K and R;

**Compliance with Laws** -- It will comply with applicable laws.

  
\_\_\_\_\_  
Signature of Authorized Official

5/25/18  
\_\_\_\_\_  
Date

Mayor  
\_\_\_\_\_  
Title

**OPTIONAL CERTIFICATION  
CDBG**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

  
\_\_\_\_\_  
Signature of Authorized Official

5/25/18  
Date

Mayor  
Title

## ESG Certifications

The Emergency Solutions Grants Program Recipient certifies that:

**Major rehabilitation/conversion** – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the jurisdiction will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the jurisdiction serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** – The jurisdiction will assist homeless individuals in obtaining permanent housing, appropriate supportive services ( including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for such individuals.

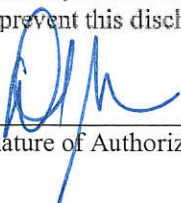
**Matching Funds** – The jurisdiction will obtain matching amounts required under 24 CFR 576.201.

**Confidentiality** – The jurisdiction has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** – To the maximum extent practicable, the jurisdiction will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** – All activities the jurisdiction undertakes with assistance under ESG are consistent with the jurisdiction’s consolidated plan.

**Discharge Policy** – The jurisdiction will establish and implement, to the maximum extent practicable and where appropriate policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

  
\_\_\_\_\_  
Signature of Authorized Official

5/25/18  
\_\_\_\_\_  
Date

Mayor  
\_\_\_\_\_  
Title

## APPENDIX TO CERTIFICATIONS

### INSTRUCTIONS CONCERNING LOBBYING:

#### A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

## **Executive Summary**

### **AP-05 Executive Summary - 91.200(c), 91.220(b)**

#### **1. Introduction**

The City of Lancaster will receive a CDBG entitlement amount of \$1,679,235 and \$139,155 in ESG entitlement funds for the 2018 fiscal year.

#### **2. Summarize the objectives and outcomes identified in the Plan**

CDBG, ESG and HOME funds (as allocated to the developing City/County Consortium) will be directed toward accomplishing the following primary objectives during 2018:

1. Provide decent, affordable rental and owner-occupied housing for low- and very low-income persons throughout the City;
2. Upgrade public infrastructure and facilities in areas of the City principally occupied by persons with low- and very low-incomes;
3. Provide human services for low- and very low-income individuals and families;
4. Improve accessibility for persons with disabilities; and
5. Support emergency shelters and improve supportive services for persons experiencing homeless or those at-risk of becoming homeless, by helping them obtain and sustain permanent housing.

#### **3. Evaluation of past performance**

The City of Lancaster has had past success in implementing all projects included in the plan. These projects have met all timeliness deadlines and have benefited the low/mod population of the City.

#### **4. Summary of Citizen Participation Process and consultation process**

A legal advertisement was placed in the Lancaster Newspaper on Friday, May 25, 2018 announcing the 30-day public comment period and public meeting to be held on Thursday, June 21, 2018. The notices were also placed on the City's website with the draft plan.

#### **5. Summary of public comments**

TBD

#### **6. Summary of comments or views not accepted and the reasons for not accepting them**

TBD

#### **7. Summary**

**PR-05 Lead & Responsible Agencies - 91.200(b)**

**1. Agency/entity responsible for preparing/administering the Consolidated Plan**

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

<b>Agency Role</b>	<b>Name</b>	<b>Department/Agency</b>
Lead Agency	LANCASTER	
CDBG Administrator	LANCASTER	Economic Development & Neighborhood Revitalization
HOPWA Administrator		
HOME Administrator		
ESG Administrator	LANCASTER	Economic Development & Neighborhood Revitalization
HOPWA-C Administrator		

**Table 1 – Responsible Agencies**

**Narrative**

**Consolidated Plan Public Contact Information**

Susannah Bartlett, Community Development Administrator, 717-291-4743; 120 N. Duke Street, Lancaster, PA 17602

subartlett@cityoflanasterpa.com

## **AP-10 Consultation - 91.100, 91.200(b), 91.215(l)**

### **1. Introduction**

The City works with numerous public, non-profit and for-profit agencies to develop strategies, policies & procedures. City representatives serve on Boards of many of these organizations and work directly with staff across various organizations to develop and accomplish goals.

#### **Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).**

The City of Lancaster is heavily involved in the Lancaster County Coalition to End Homelessness (LCCEH). LCCEH is comprised of many social service agencies, housing counseling agencies, county agencies and public housing authorities (both city and county). City staff also work closely with other agencies outside of the LCCEH.

OA city representative serves on the Lancaster County Behavioral Health and Developmental Services (BHDS) Advisory Board. The City Health Officer also works in collaboration with the local hospital. Two City employees are also involved in economic development efforts in the City, which ties them to both non-profit and for-profit agencies.

The LCCEH has almost achieved function zero for chronically homeless individuals and families. A significant amount of CoC funds have also been focused on rapidly rehousing families with children.

#### **Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

The Lead Agency of the Continuum of Care (PA-510) is the Lancaster County Coalition to End Homelessness (LCCEH). A City representative serves on the LCCEH Governance Board and chairs the LCCEH Gaps Analysis Committee. The Gaps Analysis Committee reviews data from HMIS and other sources to identify gaps in the services system, as well as needs of the community. This year, Lancaster's Rapid Re-Housing services were focused on. The LCCEH works with service providers to house chronically homeless individuals and families in permanent supportive housing. The LCCEH has also been working with Veteran's Affairs; this partnership has allowed the LCCEH to reach functional zero for homeless veterans.

The LCCEH has almost achieved function zero for chronically homeless individuals and families. A significant amount of CoC funds have also been focused on rapidly rehousing families with children.



**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

A city staff member serves on the Governance Board of the LCCEH, the Leadership Team, Provider Advisory Group and chairs the Gaps Analysis Committee. City staff meet regularly with the LCCEH and other funders of homeless programs to ensure consistency and work to achieve efficiency. A City staff member is also on the HMIS Steering Committee, which focuses on the development of policies and procedures for HMIS, as well as their monitoring and implementation

For the second year, the City, County, United Way and LCCEH (which receives and administers Homeless Assistance Funds from the County) created a joint application for 2018/2019 service programs. This coordination greatly increases efficiency and effectiveness in the delivery of services to individuals and families experiencing homelessness or at-risk of experiencing homelessness.

**2. Agencies, groups, organizations and others who participated in the process and consultations**

See Chart on next page

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Redevelopment Authority of the County of Lancaster
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This plan was jointly submitted with the Lancaster County Redevelopment Authority. Policies and strategies were discussed and created collaboratively.
2	<b>Agency/Group/Organization</b>	UNITED WAY
	<b>Agency/Group/Organization Type</b>	United Way
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City routinely meets with United Way staff to discuss homeless strategies. The President & CEO of the United Way also sits on the Mayor's Commission to Combat Poverty.

3	<b>Agency/Group/Organization</b>	LANCASTER HOUSING OPPORTUNITY PARTNERSHIP
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	LHOP is involved in the Leadership of the Lancaster County Coalition to End Homelessness; LHOP's executive Director is on a sub-committee for the Mayor's Commission to Combat Poverty; LHOP is also part of the Coalition for Sustainable Housing and the Fair Housing Program is run by LHOP staff.
4	<b>Agency/Group/Organization</b>	Tabor Community Services
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Tabor is a member of various committees under the Coalition to End Homelessness and is also the provider of coordinated assessment, emergency shelter, and rapid re-housing programs. Tabor actively participates in review gaps in the homeless system and provides input on policies and strategies.

5	<b>Agency/Group/Organization</b>	Lancaster City Alliance
	<b>Agency/Group/Organization Type</b>	Business and Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City adopted "Building on Strength" as its economic development plan, which was developed by the Lancaster City Alliance. A City representative sits on the Board.

**Identify any Agency Types not consulted and provide rationale for not consulting**

N/A

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	Lancaster County Coalition to End Homelessness	The City works closely with the LCCEH to develop strategies to address homelessness throughout Lancaster City & County. The City participated in a joint funding application process run by the LCCEH to award its ESG funds. A City representative also sits on the Board.

**Table 3 - Other local / regional / federal planning efforts**

**Narrative**

N/A

**AP-12 Participation - 91.401, 91.105, 91.200(c)**

**1. Summary of citizen participation process/Efforts made to broaden citizen participation**

**Summarize citizen participation process and how it impacted goal-setting**

A legal advertisement was placed in the Lancaster Newspaper on Friday, June 25, 2018 announcing the 30-day public comment period and public meeting to be held on Thursday, June 21, 2018. The notices were also placed on the City's website with the draft plan.

Lancaster City Council will review the submission of the Annual Action Plan on June 4, 2018. This will occur during a regular Council meeting, which is open to the public and allows for public comment. Copies of the text of the legal advertisements, public meeting sign-in sheet for the public meeting and a copy of the City Council Resolution will be attached to the final draft of the 2018 Annual Action Plan.

**Citizen Participation Outreach**

<b>Sort Order</b>	<b>Mode of Outreach</b>	<b>Target of Outreach</b>	<b>Summary of response/attendance</b>	<b>Summary of comments received</b>	<b>Summary of comments not accepted and reasons</b>	<b>URL (If applicable)</b>
1	Public Meeting		TBD	TBD	TBD	
2	Newspaper Ad		TBD	TBD	TBD	
3	Internet Outreach		TBD	TBD	TBD	
4	City Council Meeting		TBD	TBD	TBD	

**Table 4 – Citizen Participation Outreach**

**Expected Resources**

**AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)**

**Introduction**

Expected resources will be devoted to providing supplemental funding to a variety of programs that work toward accomplishing our primary objectives:

1. Provide decent, affordable rental and owner-occupied housing for low- and very low-income persons throughout the City;
2. Upgrade public infrastructure and facilities in areas of the City principally occupied by persons with low- and very low-incomes;
3. Provide human services for low- and very low-income individuals and families;
4. Improve accessibility for persons with disabilities; and
5. Support emergency shelters and improve supportive services for persons experiencing homeless or those at-risk of becoming homeless, by helping them obtain and sustain permanent housing.

**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,679,235		0	1,679,235	0	Entitlement Amount and estimated Program Income

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	139,155	0	0	139,155	0	Entitlement Amount

**Table 5 - Expected Resources – Priority Table**

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

Federal funds will continue to leverage private, state and local funds. CDBG funds will supplement a variety of programs that have other sources of funding. The Streets Improvements program generally utilizes other state grant funds as well as City Capital Improvement funds. The City of Lancaster’s internal operating funds also supplement the Housing Code Enforcement Program and the Neighborhood Crime Prevention Program.

The CDBG funds used for the Micro-Enterprise development program represents less than 5% of their total program budget; the majority of their budget is comprised of privately raised funds. The Fair Housing Program also receives private funds, in addition to state and local funds.

The ESG funds will be utilized for Emergency Shelter and Homeless Prevention and Rapid Rehousing. These funds will leverage United Way and FEMA Emergency Food and Shelter Program dollars, as well as other private donations and grants secured by providers.

The matching requirements for ESG funds will be met by way of the City of Lancaster's CDBG and General Funds. Rapid Rehousing and Emergency Shelter Operations will be matched by VA funds, the Pennsylvania Coalition Against Domestic Violence, United Way, Continuum of Care funds and other private donations. All matched funds will pay for expenses that are eligible under ESG, such as coordinated assessment, street outreach, rental and financial assistance, case management and shelter operations.

**If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

N/A



**Annual Goals and Objectives**

**AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)**

**Goals Summary Information**

<b>Sort Order</b>	<b>Goal Name</b>	<b>Start Year</b>	<b>End Year</b>	<b>Category</b>	<b>Geographic Area</b>	<b>Needs Addressed</b>	<b>Funding</b>	<b>Goal Outcome Indicator</b>
<b>1</b>	Housing	2016	2020	Affordable Housing	LANCASTER CITY	Maintain Affordable Housing	CDBG: \$980,000	Homeowner Housing Rehabilitated: 40 Household Housing Unit Housing Code Enforcement/Foreclosed Property Care: 2500 Household Housing Unit
<b>2</b>	Removal of Blight	2016	2020	Affordable Housing	LANCASTER CITY	Provide Suitable Living Environment	CDBG: \$100,000	Homeowner Housing Rehabilitated: 25 Household Housing Unit
<b>3</b>	Economic Development	2016	2020	Non-Housing Community Development	LANCASTER CITY	Expand Economic Opportunities	CDBG: \$5,000	Jobs created/retained: 5 Jobs
<b>4</b>	Create Suitable Living Environment	2016	2020	Affordable Housing Non-Housing Community Development	LANCASTER CITY	Provide Suitable Living Environment	CDBG: \$390,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 33567 Persons Assisted Public service activities other than Low/Moderate Income Housing Benefit: 33567 Persons Assisted
<b>5</b>	Assist Homeless Persons	2016	2020	Homeless	LANCASTER CITY	Homeless Services	ESG: \$141,883	Tenant-based rental assistance / Rapid Rehousing: 250 Households Assisted Homeless Person Overnight Shelter: 200 Persons Assisted

**Table 6 – Goals Summary**

## Goal Descriptions

1	<b>Goal Name</b>	Housing
	<b>Goal Description</b>	Maintenance of Affordable Housing by addressing blighted properties, housing code enforcement and the administration of home repair programs.
2	<b>Goal Name</b>	Removal of Blight
	<b>Goal Description</b>	The Removal of Blight goal will be carried out through the Redevelopment Authority of the City of Lancaster.
3	<b>Goal Name</b>	Economic Development
	<b>Goal Description</b>	Economic Development goals will be met by supporting programs that provide classes, counseling and coaching for entrepreneurs and persons interested in starting their own businesses.
4	<b>Goal Name</b>	Create Suitable Living Environment
	<b>Goal Description</b>	Creating Suitable Living Environments will be addressed by public improvements and public services in low- and moderate-income levels of the City.
5	<b>Goal Name</b>	Assist Homeless Persons
	<b>Goal Description</b>	Goals will be met by supporting Emergency Shelter and Rapid Rehousing Programs.

## AP-35 Projects - 91.420, 91.220(d)

### Introduction

The City will continue to support housing, public service, economic development and programs that assist those at-risk of or experiencing homelessness. (See the 2018 CDBG ESG Funding Summary Attachment for a breakdown of activities.)

#	Project Name
1	Housing Activities
2	Public Improvements/Infrastructure Activities
3	Public Service Activities
4	Economic Development
5	CDBG Planning & Admin
6	ESG17 Lancaster City

**Table 7 – Project Information**

### Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The quality of housing in the City continues to be an ongoing concern because of the age of the housing stock. Housing directly impacts the health and safety of residents, especially those that are low- and moderate-income.

In 2017, our rapid rehousing programs (under the ESG funded, homelessness prevention program) only met 71% of its intended goal. This low number contrasts with long waiting lists for Rapid Rehousing services.

In the past several years the following system wide changes have been made:

- The Lancaster County Coalition to End Homelessness (LCCEH), a network that includes the City of Lancaster, the County of Lancaster, United Way, key health and human service providers, business leaders and private sector individuals working to eradicate homelessness in Lancaster City and County through service coordination, advocacy, public education, and community organizing was formed.
- A centralized data entry system (CaseWorthy) has been implemented
- A Community Homeless Assessment and Referral Team (CHART), a team dedicated to performing in-depth needs assessments and effective referrals for clients was formed and increasing staff at Tabor have been trained.
- A new outreach worker has been brought on board.

Despite these changes, a bottleneck still exists, preventing individuals and families in need of Rapid Re-Housing from obtaining it. This may be partially due to the late start to the reporting year; providers slowed down or stopped their referrals until the community was issued the grant by HUD. In response to the bottleneck, LCCEH formed a Rapid Rehousing Process Analysis and Review Committee in 2018 to review, analyze, and recommend changes to the referral/connection process for our rapid rehousing services. Key City staff sat on the committee and participated in the committee's review process. The findings are due to be released within the year.

**AP-38 Project Summary**

**Project Summary Information**

<b>1</b>	<b>Project Name</b>	Housing Activities
	<b>Target Area</b>	LANCASTER CITY
	<b>Goals Supported</b>	Housing Removal of Blight
	<b>Needs Addressed</b>	Maintain Affordable Housing Provide Suitable Living Environment
	<b>Funding</b>	CDBG: \$1,080,000
	<b>Description</b>	This project is for activities that are directly related to housing.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>2</b>	<b>Project Name</b>	Public Improvements/Infrastructure Activities
	<b>Target Area</b>	LANCASTER CITY
	<b>Goals Supported</b>	Create Suitable Living Environment
	<b>Needs Addressed</b>	Provide Suitable Living Environment
	<b>Funding</b>	CDBG: \$270,000
	<b>Description</b>	This project is for public improvements/infrastructure activities.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Streets Improvements, including street re-paving and ADA curb cuts.
<b>3</b>	<b>Project Name</b>	Public Service Activities
	<b>Target Area</b>	LANCASTER CITY
	<b>Goals Supported</b>	Create Suitable Living Environment
	<b>Needs Addressed</b>	Provide Suitable Living Environment

	<b>Funding</b>	CDBG: \$120,000
	<b>Description</b>	This project is for public service activities
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Police overtime details.
4	<b>Project Name</b>	Economic Development
	<b>Target Area</b>	LANCASTER CITY
	<b>Goals Supported</b>	Economic Development
	<b>Needs Addressed</b>	Expand Economic Opportunities
	<b>Funding</b>	CDBG: \$5,000
	<b>Description</b>	This project is for economic development activities.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Small business training courses and mentoring.
5	<b>Project Name</b>	CDBG Planning & Admin
	<b>Target Area</b>	LANCASTER CITY
	<b>Goals Supported</b>	Housing Removal of Blight Economic Development Create Suitable Living Environment Assist Homeless Persons
	<b>Needs Addressed</b>	Maintain Affordable Housing Provide Suitable Living Environment Expand Economic Opportunities Homeless Services
	<b>Funding</b>	CDBG: \$254,235
	<b>Description</b>	Planning and Administration for CDBG activities and for the Fair Housing Program.

	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Planning and administration carried out by City staff; Fair Housing service program.
<b>6</b>	<b>Project Name</b>	ESG17 Lancaster City
	<b>Target Area</b>	LANCASTER CITY
	<b>Goals Supported</b>	Assist Homeless Persons
	<b>Needs Addressed</b>	Homeless Services
	<b>Funding</b>	ESG: \$139,155
	<b>Description</b>	Lancaster City ESG Program
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Rapid Rehousing & Emergency Shelter; administration of ESG program.

Please also see the 2018 CDBG ESG Funding Summary Attachment

**AP-50 Geographic Distribution - 91.420, 91.220(f)**

**Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

All funds will be used in the City of Lancaster. Projects that have direct beneficiaries will only serve low- and moderate-income households, while other programs will provide CDBG funds only in low- and moderate-income areas of the City. The only exception is the vacant & blighted program which will expend funds to address blight on a spot basis.

**Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
LANCASTER CITY	100

**Table 8 - Geographic Distribution**

**Rationale for the priorities for allocating investments geographically**

Investing in the low- and moderate-income areas of the City is the highest priority to stabilize these neighborhoods. It is also imperative that low and moderate-income households receive assistance as to not increase their vulnerability.

**Discussion**

N/A

## **AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i)**

### **Introduction**

The City of Lancaster works in coordination with the Lancaster County Coalition to End Homeless (LCCEH), which is the lead agency in charge of Lancaster's CoC. The LCCEH has established the HEADING HOME Ten Year Action Plan to Prevent and End Homelessness. The City coordinates its ESG funds with the goals

and actions established in the plan. The City has consulted with the CoC regarding its 2015 ESG program.

The City is also involved in LCCEH boards and committees; employees attend the Homeless Service Providers Network meeting, the Continuum of Care Planning Committee and the LCCEH Leadership Council and Executive Committee. The City also meets with the lead agency, the Lancaster Country Redevelopment Authority (recipient of entitlement ESG funds), and United Way (private funding provider) to coordinate efforts.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

#### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

Homeless outreach workers provide street-based and shelter-based outreach to persons experiencing homelessness. These workers build relationships with persons experiencing homelessness and connect them with services. Outreach workers also build relationships with clients at The Community Homeless Outreach Center (CHOC). CHOC is a daytime drop-in facility that provides showers, mailboxes, telephone and internet usage, and a variety of other services to persons experiencing homelessness. Once relationships are built, outreach workers connect CHOC clients with additional services.

Lancaster County began its coordinated assessment/single point of entry system, known as Community Homeless Assessment and Referral Team (CHART), in September 2013. CHART contracted with United Way 211 to provide initial client screening into the single point of entry system. CHART workers are mobile, allowing them to conduct face-to-face initial assessments to clients who are at emergency shelters, the daytime drop-in center, on the street or in other areas. Outreach Workers are trained to conduct CHART assessments. This decreases the number of contacts a client needs to work with to obtain the services they need.

CHART does the following:

- Ensures that households at imminent risk of homelessness get the right services at the right time and at the right level;
- Provides a single, trusted access point individuals and families can turn to for homeless prevention services, assessment, light case



- management and referral to emergency housing and other services to help get back on their feet;
- Focus on diversion and prevention whenever possible with shelter entry only when no other option or resource is available;
  - Recognize that a successful SPE is dependent upon full provider buy-in; must have sufficient housing specialists, diversion and rapid re-housing resources; and must include permanent housing resource identification/referral at point of entry.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

The Lancaster County Coalition to End Homelessness (LCCEH) continues to monitor the need of emergency and transitional housing. Emergency shelter that can be accessed by any family type is the highest priority to receive funding in 2018 because this is the biggest area of need in the community.

The Lancaster County Coalition to End Homelessness began a Gaps Analysis Committee in late 2014. This committee reviews gaps in the service system for homeless individuals. During 2016, the committee reviewed the availability of emergency shelter and transitional housing to individuals or households experiencing a disability or in need of medical care in addition to experiencing homelessness. This review resulted in the establishment of a training for Emergency Shelters and Transitional Shelters on Fair Housing, specifically on ADA requirements. The training took place in March 2017 and was presented by the local Fair Housing program which receives CDBG funds from the City.

In response to the 2017 bottleneck or rapid rehousing services (see AP – 35 for more information), LCCEH formed a Rapid Rehousing Process Analysis and Review Committee in 2018 to review, analyze, and recommend changes to the referral/connection process for our rapid rehousing services. Key City staff sat on the committee and participated in the committee’s review process. The findings are due to be released within the year.

CHART assessments are also conducted before any individual or family can enter emergency shelter or transitional housing, except for those fleeing domestic violence.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

Rapid re-housing services is the primary method to make the transition to permanent housing and independent living for persons experiencing homelessness. Rapid re-housing helps chronically homeless individuals and families, families the children, veterans and their families to move out of homelessness and into permanent housing as quickly as possible. Tabor Community Services operates a rapid re-

housing activity program "Shelter To Independent Living Program." This program is currently funded through Lancaster County CDBG public service dollars, other HUD funds and ESG funds.

The skills and disciplines taught through the provision of services as well and the resources identified in the individual Housing Plan works to prevent formerly homeless persons from returning to homelessness. Self-sufficiency is the primary goal of the program.

The Lancaster County Continuum of Care meets with publicly funded institutions to ensure proper discharge planning. The Lancaster County Re-Entry Management Organization (RMO) focuses specifically on citizens returning from corrections institutions and programs. Hospitals, county behavioral health, RMO, housing and other various social service providers are represented at the various levels of the Continuum of Care, including its Homeless Service Provider Network (front-line staff), Continuum of Care Planning Committee (management level staff), Leadership Board (upper management) and Executive Committee (sub-set of Leadership Board). City and County staff participate at all levels of the Continuum of Care.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions) or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

The CoC works with the Lancaster County Children and Youth Agency (CYA) who established the Independent Living (IL) Unit to ensure that youth aging out of foster care are not discharged into homelessness. The IL Unit offers education and supportive services for ages 16-21. Staff members facilitate weekly groups about daily living skills such as budgeting, employment, and cooking; including an advanced group to address specific needs of older IL youth. Community volunteers mentor youth for ongoing support as they access independent housing.

Housing types included independent residences, resource homes, residential settings, and specifically developed IL programs with private community providers. Services provided as they exit care included assistance locating and maintaining housing and job search assistance. The aftercare specialist IL Coordinator locates housing through a number of strategies including identifying resources the youth already have, local affordable housing projects (HDC & Community Basics) and relationships with landlords and realtors. A financial assistance program assists youth in paying for housing until they build savings and maintain a budget. Collaborative stakeholders include Administration of PA Courts, CYA, Guardians Ad Litem, and OCYF, Boys Club and local housing providers.

## **Discussion**

N/A

## **AP-75 Barriers to affordable housing -91.420, 91.220(j)**

### **Introduction**

Lancaster continues to seek opportunities to provide housing for residents in the City identified as “in need of affordable shelter.” The main barriers to meeting the needs of the underserved are

- the limited funds available to address the scarcity of affordable housing,
- the high cost of land available for development/redevelopment, and
- the fact that there is an extremely limited amount of land available in the City for new construction.

Lancaster supports and funds several activities aimed at reducing or eliminating barriers to fair housing for lower-income persons wishing to reside in the City.

### **Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

The preservation and improvement of affordable housing in low- and very low-income neighborhoods is a long-term goal of the City. Achievement of this goal will be promoted in 2018 through (1) continuous, aggressive code enforcement by the staff of the City’s “Housing Code Enforcement Program”, (2) City efforts through its “Homeowner Rehabilitation Assistance Project,” to rehabilitate owner occupied housing, restoring the dwelling units to livable conditions, and preventing them from being lost, and (3) the provision of assistance to low- and very low-income City homeowners to remediate an emergency home repair through the “Critical Home Repair Loan Project.”

The “Housing Code Enforcement Program” will enable the City to implement a Housing Code enforcement program designed to improve health and safety conditions in the homes of lower-income City residents, and to prevent deterioration of the City’s affordable housing stock and the spread of blight, particularly in areas principally occupied by lower-income persons.

The City administers a “Homeowner Rehabilitation Assistance Project” for homeowners to help them maintain the condition and integrity of their homes. The Project serves lower income homeowners of all ages, including senior citizens, by enabling them to remain in their homes (improved by the Project to comply with the Housing Code) considerably longer than they otherwise may have been able to without Project assistance. In this historic City with a majority of older homes, the maximum cost of homeowner rehabilitation projects is \$40,000 per unit. Also, the City will conduct through this Project childhood lead poisoning prevention activities that identify children under the age of

six that have lead-based paint poisoning or may be subject to lead hazards. The City will work to eliminate their health problems and to control and reduce lead paint hazards in the environment of its children.

Lancaster will also operate a "Critical Home Repair Loan Project" to assist lower-income homeowners facing an emergency situation regarding some aspect of their home that is threatening to their health or life, and which requires immediate attention and resolution. The Critical Home Repair Loan Project addresses serious housing problems that cannot wait for the normal rehabilitation program process because of the immediate nature of the emergency. The intent of the Project is to help lower-income persons or families remain in their affordable housing despite the occurrence of an otherwise insurmountable emergency. Examples of "critical" situations would be when an old heating system in a home is not properly functioning during cold weather and cannot be repaired, a leaking roof, or a broken sewage pipe that is causing sewage to back up into a house.

### **Discussion**

The Redevelopment Authority of the City of Lancaster (in close coordination with the City Department of Economic Development and Neighborhood Revitalization) operates the "Vacant and Blighted Property Acquisition and Disposition Project" through which it obtains control of blighted, unoccupied homes within the city. The blighted homes are acquired through purchase or eminent domain. The properties must have been condemned for 30-days or vacant for 90 days. The Authority then sells them to individuals, developers, or City agencies for rehabilitation. During 2018, it is expected that 25 affordable, single-family units will be acquired, rehabilitated and sold. A deed restriction is placed on each single-unit residential property sold, requiring the property to be owner-occupied. This restriction will help to stabilize neighborhoods by promoting homeownership.

## **AP-85 Other Actions - 91.420, 91.220(k)**

### **Introduction**

#### **Actions planned to address obstacles to meeting underserved needs**

The City's Critical Repair Program, Homeowner Rehab Program, Lead Hazard Control Program and Healthy Homes Program all focus on maintaining owner occupied housing for households under 80% AMI. The City's Code Enforcement Program and Vacant Property Programs also assist ensuring the maintenance of housing throughout the City. The City has also worked with local agencies to obtain State grant funds to administer façade repair programs. The also works with SACA Development Corp. (a qualified CHDO) in their development of affordable housing, particularly in the South East area of Lancaster City, which has a concentration of minority and low-income households.

Other actions that will continue during the 2018 during program year to address the obstacles to meeting the underserved needs include:

- Housing Rehabilitation of owner-occupied units, lead-paint testing and remediation and historic preservation
- First-time homebuyer programs are administered to help make housing affordable,
- Fair Housing program provided education and mediated issues between landlords and tenants
- Conditions of slums and blight have been eliminated and substandard living conditions have been removed to provide suitable living environments, and
- Public service activities have been undertaken, including crime prevention measures to enhance and Lancaster's neighborhoods and increase access to services.

These programs enhance the livability of the property and provide owners with an affordable method to stay in a stable, healthy environment.

#### **Actions planned to foster and maintain affordable housing**

The City's Critical Repair Program, Homeowner Rehab Program, Lead Hazard Control Program and Healthy Homes Program all focus on maintaining owner occupied housing for households under 80% AMI. The City's Code Enforcement Program and Vacant Property programs also assist ensuring the maintenance of housing throughout the City. The City has also worked with local agencies to obtain State grant funds to administer facade repair programs. The City also works with SACA Development Corp. (a qualified CHDO) in their development of affordable housing, particularly in the South East area of Lancaster City, which has a concentration of minority and low-income households. These programs enhance the livability of the property and provide owners with an affordable method to stay in a stable, healthy environment.

#### **Actions planned to reduce lead-based paint hazards**

The City of Lancaster administers a Lead-Based Paint program that can assist eligible homeowners with reducing and/or abating lead hazards in their properties. This program has also been expanded to include rental properties. The City of Lancaster was a subrecipient of Lawrence County, PA, who

received Lead-Based Paint Hazard control funds from HUD. These funds allowed the City to address lead paint hazards in eligible owner-occupied properties. During 2016, the City was awarded a Lead-Based Paint Hazard Control (LBPHC) grant that has allowed the City to expand their lead paint program to address hazards in rental housing through 2018. CDBG funds have and will be used as a match for these grants.

### **Actions planned to reduce the number of poverty-level families**

In 2016, the Mayor's Commission to Combat Poverty released One Good Job, A Strategic Plan to Cut Poverty in Half in Lancaster City by 2032. The plan includes recommendations in four areas: Workforce, Education, Housing and Community.

The City will continue its work to address housing issues for low and moderate-income families by providing emergency home repair and homeowner rehabilitation programs. Additionally, the Neighborhood Crime Reduction Project aims to reduce crime and improve quality-of-life for residents in neighborhoods with concentrated poverty.

Finally, the City has created a Poverty Commission, which comprises of various social service agency leaders and community leaders. This commission, through four working groups, will create a plan to address poverty in Lancaster City.

### **Actions planned to develop institutional structure**

The Department of Economic Development and Neighborhood Revitalization (EDNR) assists with many efforts to overcome gaps in the institutional structure of the service delivery system in the City. The City recognizes that challenges with the institutional structure must be resolved through a collaborative approach across all community stakeholders. Coalitions, partnerships, and networks that facilitate the exchange of information and ideas will continue to be enhanced across all sectors of the community.

During 2018, EDNR representatives will belong to a variety of committees and boards. This involvement helps the City to understand its role and responsibilities. These collaborative entities include:

- Lancaster City Alliance,
- Lancaster Housing Opportunity Partnership (LHOP),
- Redevelopment Authority of the City of Lancaster,
- Lancaster County Coalition to End Homelessness
- Lancaster County Behavioral Health & Development Services Advisory Board,
- SACA Development Corporation (a qualified CHDO),
- SoWe: Southwest Neighbors
- Elm Street Revitalization Program for Southeast Lancaster

From 2016 – 2020, the City has sought and will continue to seek to achieve the following goals

regarding Lancaster’s institutional structure:

1. Strengthen existing public/private partnerships and create new ones to implement programs and deliver services of all types.
2. Promote citizen participation as the cornerstone of every planning process.
3. Create interactive community information systems at the city and neighborhood levels.
4. Create community indicators and benchmarking programs to measure the success of public and private programs and policies.
5. Provide public education and encourage public awareness regarding issues that affect all City residents, but primarily person of low and very low income.
6. Customize housing information and technical assistance.
7. Maximize existing City programs that provide homeownership and rental assistance.
8. Support advocacy and planning activities with organizations whose primary mission relates to the provision of housing for low- and very low-income households.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

City employees sit on various boards and committee whose memberships provide a network that spans private housing and social service agencies – such as Lancaster Housing Opportunity Partnership, Lancaster County Behavioral Health and Development Services and the Lancaster County Coalition to End Homelessness (LCCEH). The City is also involved with the Spanish American Civic Association, which develops housing for low and moderate-income household. SACA also provides social services to seniors and others in the community and operates a workforce training facility.

One Coalition in particular, the LCCEH, has made significant strides in enhancing coordination between community stakeholders. The Coalition is made up of a variety of social service, faith-based, mental health providers and housing agencies. While the main goal of the coalition is focused on ending homelessness, housing plays a key part in executing that goal. The coalition also allows for partnerships to be built and networking to be done between various agencies.

### **Discussion**

In 2018, the City of Lancaster will continue to support the Fair Housing Program. This program is carried out by the Lancaster Housing Opportunity Partnership (LHOP) and receives CDBG Administrative funds to address impediments identified in the 2013 Analysis of Impediments to Fair Housing Choice. The program also provides services to landlords and tenants in relation to Fair Housing law and landlord/tenant issues. Please see the below attachment: *The Fair Housing Program* for more information on how the Fair Housing Program impacted specific impediments.

The City continued to address ADA accessibility by installing 170 ADA curb cuts during 2018/2019, per the City’s ADA Improvement Plan. The City’s HOME funded Homeowner Rehabilitation Program also made accessibility modifications to homes when appropriate.

The City will also continue to ensure meaningful access to programs and activities by Limited English Proficient (LEP) persons through the development and implementation of the City of Lancaster’s Language Access Plan (due to be completed by 2019). Federally funded programs carried out by the

City (Critical Repair Program, Homeowner Rehabilitation Program and the Lead Hazard Control Program) have documents and information available in both English and Spanish. The manager of these programs is also bilingual and is available to translate for Spanish speaking residents.

The City will continue to work regularly with the Spanish American Civic Association (SACA) which provides services to the Hispanic community. SACA is also a Community Housing Development Organization and has received HOME funding to create and renovate affordable housing units. LHOP also offers first-time homebuyer classes and a down payment assistance program. Documents and classes are available in both English and Spanish.

The City of Lancaster submitted a joint 2016 – 2020 Consolidated Plan with the County of Lancaster as the City and County are part of a consortium of the HOME Investment Partnership Program. Please view the County's 2018 Annual Action Plan for a comprehensive understanding of how the Lancaster community is addressing the identified *Impediments to Fair Housing* (2013).

### **The Fair Housing Program**

In 2017, The Fair Housing Program was tasked with addressing the following impediments in the following ways: Impediment A: With an increasing number of people in the County, there is more demand for an ongoing education program for fair housing requirements. This impediment will be address by conducting the following: - 4 Fair Housing trainings in partnership with PHFA and other agencies - 1 Civil Rights in Housing Event - Provided technical assistance (individuals duplicated per case/topic area) - Distribution of the Tenant/Landlord Rights and Responsibilities Manual in print and electronically in 7 different languages Impediment D: Persons with disabilities are limited in where they go due to architectural barriers in the community and in private home construction like curbs, sidewalk, steps, narrow door openings, etc. - Worked with local disability organizations to explore creation of housing opportunities that will increase housing choice for this community. Facilitated the accessible housing units with Lancaster County by 71%. Performed 1 Disability Rights in Housing event Impediment F: Lancaster County and the City of Lancaster are racially and ethnically concentrated/segregated. & Impediment I: People with limited English proficiency may have barriers to fair housing - Worked with local immigrant and resettlement organizations to address ensure that fair housing rights are understood and accommodated for these populations. b. Distribution of the Tenant/Landlord Rights and Responsibilities Manual in print and electronically in multiple languages, including Spanish



**Program Specific Requirements**

**AP-90 Program Specific Requirements - 91.420, 91.220(l)(1,2,4)**

**Introduction**

**Community Development Block Grant Program (CDBG)**

**Reference 24 CFR 91.220(l)(1)**

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

- 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed 0
- 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan. 0
- 3. The amount of surplus funds from urban renewal settlements 0
- 4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan 0
- 5. The amount of income from float-funded activities 0
- Total Program Income: 0**

**Other CDBG Requirements**

- 1. The amount of urgent need activities 0
- 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. 94.22%

**Emergency Solutions Grant (ESG)**

**Reference 91.220(l)(4)**

- 1. Include written standards for providing ESG assistance (may include as attachment)  
See Attachment - Standards and Policies
- 2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.  
Since September 2013, the Community Homeless Assessment and Referral Team, known as CHART, has been the serving as the coordinated assessment system, which serves those experiencing homelessness and at imminent risk of homelessness in Lancaster County.

All calls originate from the United Way's 211 system, which conducts a pre-screening.

Households experiencing or at imminent risk of homelessness are then connect to CHART, who performs an assessment and make appropriate referrals to shelter, rapid rehousing programs or diverts the client from shelter if possible. CHART will conduct a VI-SPDAT for any household that has not self-resolved within 10 days of entering the system. The VI-SPDAT is the priority tool used by Lancaster to gain entry into a Permanent Supportive Housing program, or be referred to a rapid rehousing program (these referrals are prioritized based on the VI-SPDAT).

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations). The City of Lancaster has partnered with the Lancaster County Housing & Redevelopment Authorities, the United Way of Lancaster and the Lancaster Coalition to End Homelessness in a joint application process for the second year. All these agencies provide funds for homeless services in Lancaster. A single application was created to access all these funds. The LCCEH Governance Board reviews and scores grant applications and makes funding recommendations. The City and other partners work together to identify the most efficient and effective use of funds. Lancaster City Council will make final approval of all grants awarded using City ESG funds.

This process has been well-received by partner agencies. Agencies that apply for funding are offered the opportunity to comment and make recommendations on the process. Recommendations were made and accepted from the first year of the process, with changes made in the second year.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

Formerly homeless individuals (both HUD defined and non-HUD-defined) serve in leadership roles in the CoC and participate in policy and funding decisions.

5. Describe performance standards for evaluating ESG.  
These are the outcomes that will be measured by your program:

- 56% of clients access mainstream services (1 or more)
- 100% HMIS data accuracy (no missing or null data)
- Less than 5% of exits unknown
- Decrease length of stay in shelter (last year and current year)
- 80% of exits to permanent housing
- 80% of clients that moved into permanent housing remained in housing for at least 9 months
- 20% of clients increased earned income at exit than at entry
- 70% of exits do not return to homelessness in 12 months for emergency shelter programs
- 85% of exits do not return to homelessness in 12 months for rapid rehousing programs

**2018 ANNUAL ACTION PLAN SUMMARY  
COMMUNITY DEVELOPMENT BLOCK GRANT**

<u>Project</u>	<u>Activity</u>	<u>Amount</u>
<b>Housing Activities</b>	Vacant & Blighted	\$ 100,000.00
	Housing Code Enforcement	\$ 525,000.00
	Critical Repair and Lead Hazard Reduction Program	\$ 180,000.00
	Critical Repair	\$ 100,000.00
	Lead Hazard Removal Matching Funds	\$ 175,000.00
	<b>Public Improvements Activities</b>	Streets Improvements
<b>Economic Development</b>	Micro-Enterprise	\$ 5,000.00
<b>Public Service Activities</b>	Neighborhood Crime	\$ 120,000.00
<b>CDBG Planning &amp; Admin</b>	CDBG Planning & Admin	\$ 180,000.00
	Indirect	\$ 54,235.00
	Fair Housing Program	\$ 20,000.00
	<b>Total</b>	<b>\$ 1,729,235.00</b>
<b>REVENUE</b>	2018 Entitlement	\$ 1,679,235.00
	2018 Estimated PI	\$ 50,000.00
	<b>Total</b>	<b>\$ 1,729,235.00</b>

**2018 EMERGENCY SOLUTIONS GRANT**

<u>Activity</u>	<u>Amount</u>
7.5% Admin	\$ 10,435.00
51%% Emergency Shelter	\$ 70,970.00
41.5% Rapid Rehousing	\$ 57,750.00
<b>Entitlement Amount</b>	<b>\$ 139,155.00</b>

PUBLIC MEETING  
Notice of a Public Review and Comment Period for Lancaster City's  
Draft 2018 ANNUAL ACTION PLAN

A Public Meeting will take place at 12:00 p.m., Thursday, June 21, 2018 in the City Council Chambers at City Hall, 120 North Duke Street.

Lancaster's draft Annual Action Plan describes the upcoming activities to be funded in 2018 under the federal Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG) Programs.

A copy of the 2018 Annual Action Plan is available on the City's website at <http://cityoflanasterpa.com/resident/plans-reports> and at City Hall.

The City will accept citizen comments regarding the Annual Action Plan for 30 days (from May 25 to June 25). Comments can be Monday – Friday from 8:30 a.m. and 5:00 p.m. through the following methods:

By mail: 120 North Duke Street (PO Box 1599), Lancaster, PA 17608-1599

By phone: (717) 291 – 4743

By email: [subartlett@cityoflanasterpa.com](mailto:subartlett@cityoflanasterpa.com)

If you are a person who is mobility impaired or have other special or language need, please contact Susannah Bartlett at the above information for special accommodations.

Danene Sorace  
Mayor

**PROOF OF PUBLICATION NOTICE IN**

State of Pennsylvania}  
  } ss:  
County of Lancaster}

An Affiant of the County and State aforesaid, being duly sworn, deposes and says that the LNP, a daily newspaper of general circulation published at Lancaster, County and State aforesaid, was established 1794-1877 since which date said daily newspaper has been regularly issued in said county, and that a copy of the printed notice or publication is attached hereto exactly the same as was printed and published in the regular editions and issues of said daily newspaper on the following dates:

25<sup>TH</sup> DAY OF MAY 2018

Affiant further deposes that he/she is the Clerk duly authorized by the LNP Media Group, Inc., a corporation, publisher of said LNP, a newspaper of general circulation, to verify the foregoing statement under oath, and also declares that affiant is not interested in the subject matter of the aforesaid notice or advertisement and that all allegations in the foregoing statement as to time, place and character of publication are true.

**PUBLIC MEETING**  
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Danene Sorace  
Mayor

  
\_\_\_\_\_  
(Affiant's Signature)

**COPY OF NOTICE OF PUBLICATION**

Sworn and subscribed to before me this  
25<sup>TH</sup> DAY OF MAY 2018

  
\_\_\_\_\_  
Notary Public

COMMONWEALTH OF PENNSYLVANIA  
NOTARIAL SEAL  
Jeffrey J. Hollinger, Notary Public  
City of Lancaster, Lancaster County  
My Commission Expires June 10, 2021  
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

# PUBLIC MEETING

(6/21/2018)

For Lancaster's Proposed, Federally-Funded,

## COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM EMERGENCY SOLUTIONS GRANT PROGRAM

2018 Annual Action Plan

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(Please Print)

	YOUR NAME / ORGANIZATION	HOME ADDRESS or ORGANIZATION ADDRESS	PHONE #
1.	<b>NO ATTENDEES</b>		
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			

**FILE OF THE CITY CLERK**

**ADMINISTRATION RESOLUTION NO. 46 – 2018**

**INTRODUCED – JUNE 26, 2018**

**ADOPTED BY COUNCIL – JUNE 26, 2018**

**A RESOLUTION OF THE COUNCIL OF THE CITY OF LANCASTER AUTHORIZING THE MAYOR TO SUBMIT THE 2018 ANNUAL ACTION PLAN (YEAR THREE OF THE CITY'S FIVE-YEAR CONSOLIDATED PLAN) TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD). THE SUBMISSION INCLUDES THE PROJECTED USE OF FUNDS FOR THE COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) AND EMERGENCY SOLUTIONS GRANT PROGRAMS (ESG) DURING THE 2018 PROGRAM YEAR.**

**WHEREAS**, Lancaster's five-year *Consolidated Plan* is a comprehensive, long-term planning document that focuses limited resources on broad community goals and objectives, and ensures that the City's Federally-funded programs function in a coordinated manner; and

**WHEREAS**, an *Annual Action Plan* is developed by the City each year utilizing available resources to address community goals and objectives identified in the long-range *Consolidated Plan*; and

**WHEREAS**, the City of Lancaster has prepared an *Annual Action Plan* in accordance with Federal regulations for the 2018 Program period (January 1, 2018 to December 31, 2018); and

**WHEREAS**, the City of Lancaster is an "entitlement" City qualified, under the provisions of the Federal Housing and Community Development Act of 1974 (as amended), for Federal assistance in the amount of \$1,679,235 through the Community Development Block Grant (CDBG) Program and \$139,155 through the Emergency Solutions Grant (ESG) Program during Federal fiscal year 2018; and

**WHEREAS**, the purposes of the Federally-funded CDBG Program are to provide safe, decent, and affordable housing, to establish and maintain a suitable living environment, and to expand economic opportunities for all citizens of Lancaster, especially those persons who are of low- and very low-incomes; and

**WHEREAS**, the purposes of the Federally-funded ESG Program are for use as emergency shelter for the homeless, for the payment of certain expenses related to operating emergency shelters, for essential services related to emergency shelters and street outreach for the homeless, and for homelessness prevention and rapid re-housing assistance.

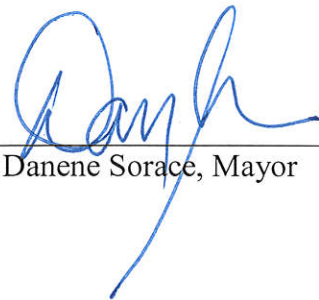
**WHEREAS**, Lancaster has determined that it is in the best interest of the citizens of the City to request the financial assistance as provided under the Federal CDBG and ESG Programs; and

**WHEREAS**, the City, following the public review and comment process specified in Federal Regulations, has prepared the required *Annual Action Plan* for 2018; and

**WHEREAS**, the submission of the 2018 *Annual Action Plan* will allow the City to receive the financial assistance as provided for under the Federal CDBG and ESG Program for the Program Year that will begin January 1, 2018;

**NOW, THEREFORE, BE IT RESOLVED** by the Council of the City of Lancaster that the Mayor is hereby authorized by City Council to submit the approved *Annual Action Plan*, including all certifications contained therein, to HUD, seeking a CDBG “entitlement” grant in the amount of \$1,679,235 and an ESG “entitlement” grant in the amount of \$139,155.

**BE IT FURTHER RESOLVED**, by the Council of the City of Lancaster that the Mayor is hereby authorized, in her capacity as Lancaster City’s Chief Executive Officer, to act fully on behalf of the City of Lancaster as its official representative in all matters pertaining to said *Annual Action Plan*, including the certifications contained therein and such additional information as may be required for the 2018 *Annual Action Plan*.



---

Danene Sorace, Mayor

Attest:



---

Bernard W. Harris Jr., City Clerk



The Lancaster County Coalition to End  
Homelessness

# CONTINUUM OF CARE PERFORMANCE STANDARDS AND POLICIES

*Vision: We will effectively end homelessness in Lancaster County.*

*Mission: The Lancaster County Coalition to End Homelessness leads community efforts to rapidly and sustainably house all people experiencing homelessness.*

[www.lcceh.org](http://www.lcceh.org)

**LANCASTER COUNTY, PENNSYLVANIA  
CONTINUUM OF CARE PERFORMANCE STANDARDS AND POLICIES**

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## LANCASTER COUNTY, PENNSYLVANIA

### CONTINUUM OF CARE PERFORMANCE STANDARDS AND POLICIES

PURPOSE: The HEARTH Act requires the Lancaster County Continuum of Care (CoC) to have written policies and procedures that govern the provision of assistance to individuals and families under the federally funded Continuum of Care programs in the City of Lancaster and the surrounding Lancaster County (24 CFR 576.400(e)). Lancaster County Continuum of Care is also requiring that these Performance Standards and Policies be followed for all homeless organizations receiving funds through Lancaster County Coalition to End Homelessness (LCCEH), Community Development Block Grant (CDBG) (both County and City) and Emergency Solutions Grant (ESG) (both County and City). Lancaster County's Continuum of Care seeks to establish community-wide expectations on the operations of projects in the county and to ensure that the system is transparent to users and operators. The Lancaster County Continuum of Care will establish a minimum set of standards and expectations in terms of the quality expected of these projects.

These standards and policies provide guidance to local providers in administering homeless assistance in the following areas:

- Eligibility standards for homeless programs.
- Targeting and prioritization for Permanent Supportive Housing (PSH), Transitional Housing (TH), Emergency Shelter, Rapid Rehousing (RR), Street Outreach and Homeless Prevention.
- Standards for administration of rental and financial assistance.

The United States Interagency Council on Homelessness strongly encourages that communities have a goal of homelessness being: **“Rare, Brief and Non-Recurring.”** The method utilized to meet that goal will be aggressive utilization of Housing First concepts and rapid re-housing programs. In order to measure our progress toward this goal, the Lancaster County Continuum of Care will follow the performance standards and policies listed below by activity.

- I. Performance Targets by Population and Program Type
  - a. All CoC and ESG-funded programs must fully participate in Lancaster's Homeless Management Information System (HMIS). All performance targets will be derived from HMIS data. Programs that are specifically forbidden to use the local HMIS by other statutes or regulations (domestic violence services) cannot participate but must collect the HMIS required data in a comparable database. The LCCEH is the System Administrator for the HMIS. LCCEH will assist any organization with HMIS requirements.
  - b. Community Homeless Assessment and Referral Team (CHART) assessments should last, on average, no longer than 30 minutes.

- c. CHART should strive to complete assessments within 24 hours of initial referral from 211. Assessments should ideally be completed the same business day unless the client chooses to schedule the assessment at a later time. Priority shall be given to people experiencing homelessness.
- d. The **average** cost per household for rapid re-housing activities (financial assistance AND the cost of providing services) should not exceed \$5,000 for individuals and \$12,500 for families.
- e. Emergency shelter facilities shall have a goal of an average length of stay of no more than 30 days.
- f. Street outreach should be targeted/provided to individuals or families living in places not meant for human habitation.
- g. See Appendix G for the detailed Annual Performance Measures for all HUD funded projects.

## II. Written Standards for CoC Assistance

- a. Evaluating Individuals and Families' Eligibility for Assistance
  - i. As set forth in the HEARTH Act, there are four categories of eligibility: 1) Literally Homeless, 2) Imminent Risk of Homelessness, 3) Homeless Under Other Federal Statutes (subject to cap), and (4) Fleeing/Attempting to Flee Domestic Violence. The Lancaster County Continuum of Care elects to serve categories 1, 2, and 4 due to the shortage of resources for those priority populations and excessive demand. We further limit category two to those who will be leaving an institution or hotel in 14 days or less , who also will have no place to go or those who have an eviction court order. Clients "doubling up" (temporarily living with family and friends) shall not be eligible for assistance.
  - ii. The household must be lacking sufficient resources or support networks immediately available to them that would otherwise prevent them from entering or exiting the homeless system.
  - iii. Clients that are most vulnerable according to the VI-SPDAT (most current version available in HMIS electronically) will be prioritized. See Prioritization Policy in Appendix E for more details.
- b. Coordinated Assessment – The goal of coordinated assessment is to link households to the most appropriate intervention that will assist the household to resolve their housing crisis.
  - i. General. All programs shall have a contingency plan for staff absences/vacancies so that clients are not stalled in their efforts to obtain and maintain housing due to staff not being accessible.
  - ii. Pre-screening
    - 1. United Way 2-1-1 will be the first point of entry for all persons seeking shelter services.

2. The pre-screening will ask for basic demographic information and enter the information into HMIS.
  - a. Name
  - b. Social Security Number
  - c. Date of Birth
  - d. Race
  - e. Ethnicity
  - f. Gender
  - g. Veteran Status
  - h. Disabling Condition
  - i. Residence Prior to Program Entry
  - j. Housing Status
3. The pre-screening will ask for the following information to determine eligibility for homeless services:
  - a. Have you or any adult currently living in your household ever served in any branch of the US military?
  - b. Are you currently living on the street, or in a place that was not really made for people to live in, or in an emergency or a transitional housing program?
  - c. Are you in danger of losing your housing?
  - d. Do you have a court order eviction notice?
  - e. When will you lose your housing?
4. Individuals and families who would spend the night in an emergency shelter or on the streets without any assistance will be given 1<sup>st</sup> preference when scheduling intake assessments.
5. Persons who are at imminent risk of homelessness within 24 hours will be given 2<sup>nd</sup> preference when scheduling intake assessments.

iii. Assessments

1. The assessment process documents the following:
  - a. Client needs based on assessment;
  - b. Eligibility based on written program standards for enrollment; 3
  - c. Referral, based on available resources; and
  - d. Disposition based on availability of housing and services in Lancaster County.
2. Referrals for available service and housing slots are made based on a CoC-defined prioritization process. See Prioritization Process.

3. **Mobile staff** must provide access to coordinated assessment services to clients unable or unwilling to utilize traditional access points.
4. Lancaster County Continuum of Care homeless service providers and facilities must adopt policies outlining the acceptable reasons a client referred to a project can be rejected/denied access by that project. Each organization must submit their policy to the Continuum of Care for approval annually by July 1<sup>st</sup> of each year to Jason Harnish via email: [jharnish2@lghealth.org](mailto:jharnish2@lghealth.org). Any revisions or changes must also be submitted and approved by the Continuum of Care.
5. Assessments should be provided in the format of the client's choice. Formats include telephone assessments or in-person assessments.
6. Performance Targets:
  - a. Community Homeless Assessment and Referral Team (CHART) assessments should last, on average, no longer than 30 minutes.
  - b. CHART should strive to complete assessments within 24 hours of initial referral from 211; ideally the same business day unless the client chooses to schedule the assessment at a later time. Priority shall be given to people experiencing homelessness.
- iv. While DV providers are exempt from participating in local coordinated assessment efforts, they are required to obtain and maintain similar data in a comparable database and share it with the local CoC. Coordination efforts between Lancaster's coordinated assessment efforts and DV providers will continue.
- v. Diversion
  1. Diversion services should be provided immediately after the completion of the assessment.
  2. Diversion services will be prioritized for persons that are expected to be homeless within 24 hours.
  3. The results of the diversion efforts shall be entered into HMIS.
  4. The amount, type and date of financial assistance or rental assistance provided on behalf of a client shall be entered into Lancaster's HMIS.
- vi. Follow-up: No follow-up surveys, calls or other types of contact are required. HMIS data should indicate how and where clients exited the system.
- vii. Outreach: Outreach workers will be considered an extension of the coordinated assessment program and will be permitted to complete a pre-screening and assessment with individuals as they encounter them, reducing the number of contacts individuals will need to get into the system.

c. Transitional housing

- i. Transitional housing funded through local governmental funds (CoC, HAP, CDBG and ESG funds) may only serve people from emergency shelters if it is determined and documented that rapid rehousing services were unable to place the household into permanent housing within three months.
- ii. Transitional housing should be designated for high barrier households. Transitional housing is the activity of last resort when other efforts have not resulted in placement in permanent housing.
- iii. In order for a transitional housing facility, that does not receive government funding, to be included in the Lancaster County Continuum of Care, it must serve 51% or more clients that meet the HUD definition of homeless. Transitional housing providers must document that clients do or do not meet the HUD definition of homelessness. Clients not meeting the HUD definition of homelessness shall be entered into designated non HUD programs in HMIS.
  1. REMEMBER: HUD requires that households in transitional housing CANNOT qualify for permanent supportive housing unless prior to the TH placement, they were living on the streets, in an emergency shelter or a safe haven. (See Appendix F, Fourth Priority)

d. Rapid Re-housing

- i. General.
  1. All persons served must have a completed Homeless Verification form in their file completed within 2 weeks of RRH program enrollment.
  2. All programs shall have a contingency plan for staff absences/vacancies so that clients are not stalled in their efforts to obtain and maintain housing due to staff not being accessible.
  3. Rapid re-housing is not designed to comprehensively address a recipient's overall service needs or poverty. It is designed to assist persons back into permanent housing as quickly as possible.
  4. Caseload Ratios
    - a. Case Management Services
      - i. Staff serving clients maintaining housing should not exceed a caseload ratio of 40 clients to one staff member.
    - b. Housing Location Services
      - i. Staff serving initial clients seeking housing should not exceed a caseload ratio of 25 clients to one staff member.
  5. Low Barrier Entry

- a. Conditions of service concerning substance abuse or other aspects of clients' lives shall not be part of rapid re-housing programs. Clients are required to abide with the terms of the lease and no more.
6. All rapid re-housing programs shall be tenant-based. No rapid re-housing programs shall be project based.
7. All RRH programs must utilize the Housing Locator.
- ii. Prioritization: Households must be prioritized by using the VISPDAT (most current version available in HMIS electronically).
- iii. Provision of Financial and Rental Assistance
  1. There shall NOT be an income limit for receiving rapid re-housing services. The goal is to move persons experiencing homelessness out of shelter. If diversion is done properly, higher income persons will likely not end up in shelter.
  2. Rapid re-housing activities should only be provided to persons in emergency shelter or on the streets. (People in transitional housing should have received rapid re-housing services BEFORE being placed in transitional housing.)
  3. Rapid re-housing services shall not guarantee financial assistance to landlords on behalf of clients. This methodology is NOT in accordance with best practice standards.
  4. The provision of financial assistance or rental assistance on behalf of a client may be in increments of no more than three (3) months of assistance only, based on financial need. After three (3) months, each household shall be carefully evaluated for the need for further financial assistance or rental assistance each month. In no case shall rental assistance be provided on behalf of a client for more than 24 months during any three-year period (24 CFR 576.106).
  5. The amount, type and date of financial assistance and rental assistance provided on behalf of a client shall be entered into Lancaster's HMIS.
  6. Amounts for financial assistance and rental assistance should be determined on the same basis across all programs. The basis for the provision of financial services should be flexible, using a case by case basis implementing the same budgeting format. (Example, no household pays more than 70% of its gross income on housing)
  7. Financial assistance and rental assistance amounts should not have a maximum amount. The amounts should be determined solely on a case by case basis determined by need.
    - a. The goal for the **average** cost per household for rapid re-housing activities (rental assistance, financial assistance AND the cost of providing services) should not exceed \$5,000 for individuals and \$12,500 for families.



8. The standard for the length of time from the determination of homelessness to placement into permanent housing is no more than an average of 45 days. The goal for the length of stay is 30 days. As Lancaster moves more toward Housing First principles in the coming years, the standard shall be reduced to meet the goal.
- iv. Case Management
    1. Participants must meet with a case manager at least once per month.
    2. Follow-up case management (after housing placement) shall be provided for up to twelve (12) months. Case management services after the client has been housed is limited to evaluating progress and addressing crises.
  - v. Income eligibility must be determined when the household reaches their twelfth month of service in program. Household income for ESG requirements must be under 30% Area Median Income (AMI) for household to remain eligible for services and/or rental assistance beyond twelve (12) months. Other funding streams should be considered case by case.
  - vi. Home visits for persons receiving rapid re-housing services
    1. Even if only a minimal amount of Housing Relocation and Stabilization Services assistance—such as utility arrears/payments (Financial Assistance) or housing stability case management (Services)—is provided, the habitability standards apply to the unit and must be documented in the program participant’s file.
    2. Organizations providing rapid re-housing services shall follow all requirements for habitability standards, rent reasonableness, Fair Market Rents and, if applicable, lead based paint.
  - vii. Core Component Program Standards
    1. Providers of Rapid Rehousing shall be monitored for meeting the standards detailed in Appendix F (starting on page 6) for continued funding.
- e. Permanent Supportive Housing (PSH)
    - i. In order to be eligible for PSH, at least one member of the household must have a disability of long duration, verified either by Social Security or a licensed professional that meets the state criteria for diagnosing and treating that condition.
    - ii. PSH must prioritize chronically homeless individuals and families for vacant units. The lead agency has a list of the most vulnerable chronically homeless individuals and families. All funded providers must fill their vacant PSH beds from that list. Non-HUD funded CoC providers are strongly encouraged to fill their vacancies from this list as well.
    - iii. PSH may not have any requirements that are not in a standard lease. (i.e. no preconditions such as income or sobriety)

- iv. PSH providers should consider changing current place-centered PSH to tenant based or scattered site.
  - v. People referred to PSH must have been living in a place not meant for human habitation, in emergency shelters, or institutions. (Note, people coming from institutions must have previously lived in a place not meant for human habitation or in an emergency shelter prior to entering the institution or transitional housing. Additionally, people from institutions must have been in the institution for fewer than 90 days.)
  - vi. All persons served must have a completed Homeless Verification form in their file.
  - vii. Prioritization: Households must be prioritized by using the VISPDAT (most current version available in HMIS electronically).
- f. Emergency Shelter
- i. Clients entering the shelter system must be HUD-defined homeless in categories 1 and 4. Shelter facilities may accept clients that are not HUD-defined homeless but they must administratively segregate those clients so that HUD funds are not used for non-HUD-defined homeless clients. In order for a shelter, that does not receive government funding, to be included in the Housing Inventory Chart, 51% or more clients must be HUD-defined homeless.
  - ii. All persons served must have a completed Homeless Verification form in their file. See Appendix H.
  - iii. Emergency shelters funded with federal funds must be a low-demand facility. In other words, there shall be no requirements for income or sobriety in order to access or maintain shelter.
  - iv. If an emergency shelter client has participated in rapid re-housing services for approximately three (3) months without finding permanent housing, the client may be transferred to a transitional housing unit.
  - v. Emergency shelter providers may not exit clients from emergency shelters to the streets for not obtaining permanent housing within the guideline of three (3) months.
- g. Homeless Prevention
- i. Any client receiving assistance must have proof of residence within Lancaster County and/or the City of Lancaster.
  - ii. Clients receiving homeless prevention services must have total household incomes less than 30 percent of Area Median Income (Median Family Income) for Lancaster Metropolitan Statistical Area (MSA) at initial assessment, AND who meet the criteria under the “at-risk of homelessness” definition, or who meet the criteria in paragraph (2), (3), or (4) of the “homeless” definition. ESG funds require 30% or less of AMI. All other funds should be case by case.

- iii. Those clients that have been homeless previously (and received rapid rehousing assistance) should be prioritized for homeless prevention services because they are statistically shown to be more likely to become homeless.
  - iv. When the Coalition approves and adopts the usage of a homeless prevention prioritization tool, households must be prioritized by the Coalition-approved prioritization tool.
  - v. The amount, type and date of rental assistance provided on behalf of a client shall be entered into Lancaster’s HMIS. All homeless prevention/diversion clients must have reassessments at a minimum of every three (3) months in order to continue receiving assistance.
  - vi. All diversion services should be used for front-door efforts. In other words, diversion is provided when an individual or family is calling for a shelter bed.
  - vii. All clients receiving CoC, HAP, CDBG and ESG funded services shall maximize and track the increased use of mainstream resources.
  - viii. Even if only a minimal amount of Housing Relocation and Stabilization Services assistance is provided—such as utility arrears/payments (Financial Assistance) or housing stability case management (Services), the habitability standards apply to the unit and must be documented in the program participant’s file.
  - ix. Performance Targets - At least 56% of all program participants will be *referred* to mainstream benefits which must be tracked in HMIS.
- h. Termination
- i. Providers may terminate assistance to a program participant who violates program requirements or conditions of occupancy provided that they have a written policy that explains program rules and the termination process. Providers must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.
  - ii. The Termination Policy must include “due process” procedures. At a minimum, the procedures must consist of:
    1. Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance;
    2. Written notice to the program participant containing a clear statement of the reasons for termination;
    3. A minimum notice period for program termination appropriate in length for the nature of the service being provided;
    4. A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision;

- 5. Prompt written notice of the final decision to the program participant; and
- iii. When terminating hard-to-house populations programs must exercise judgment and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that a program participant's assistance is terminated only in the most severe cases.
- iv. Termination under this section does not bar the recipient or sub recipient from providing further assistance at a later date to the same family or individual.
- v. Clients may use the LCCEH client grievance policy (Appendix C) to appeal terminations after the provider's process has been completed.
- i. Plain Language:
  - i. All policies provided to consumers and all forms signed by consumers must be tested for and pass "plain language" testing and be available in both English and Spanish. Guidance on how to test policies is located here: <http://www.plainlanguage.gov/howto/guidelines/FederalPLGuidelines/usability.cfm>

### III. Grievance and Appeals Policy

Please see Appendix C for the Grievance and Appeals Policy for clients and the Grievance and Appeals Policy for organizations receiving government funding.

### IV. Consequences of Not Meeting Standards

- a. Failure to meet the established standards shall trigger a review by the Lead Agency. This monitoring visit will provide technical support and guidance to improve performance standards. Organizations must show the efforts that they have undertaken to meet the standards. If the organization continues to fail to meet the performance standards established herein, despite technical assistance, funding reductions in future applications will occur.

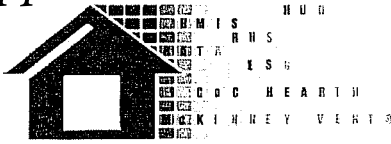
### V. Appendices

- A. Description of Barrier Levels
- B. File Documentation Requirements
- C. Appeals - Grievance Form
- D. Eligibility for HUD Benefits for Non-Citizens
- E. Prioritization Policy
- F. Rapid Re-Housing Performance Benchmarks and Program Standards
- G. Annual Performance Measures
- H. Homeless Verification Documentation

# Appendix A

## Lancaster County Continuum of Care Guidelines for Determining Housing Barrier Levels

Level Of Housing Barriers Faced By Program Participants
<b>High barriers—</b> Program participants typically have two or more of the following barriers <ul style="list-style-type: none"><li>• Long-term substance use disorder</li><li>• Previous evictions</li><li>• Zero Income</li><li>• Previous episodes of homelessness</li><li>• Chronic homelessness</li></ul>
<b>Medium barriers—</b> Program participants typically have at least one of the following barriers <ul style="list-style-type: none"><li>• Zero Income</li><li>• Substance use disorder</li><li>• Significant criminal history</li><li>• Young parent (under 25) with 2 or more children</li></ul>
<b>Low barriers—</b> <ul style="list-style-type: none"><li>• Positive rental history</li><li>• Consistent income</li><li>• Work history</li></ul>



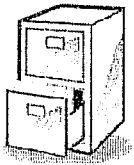
# Homeless Definition

<b>CRITERIA FOR DEFINING HOMELESS</b>	<b>Category 1</b>	<b>Literally Homeless</b>	<p>(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> <li>(i) Has a primary nighttime residence that is a public or private place not meant for human habitation;</li> <li>(ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); <u>or</u></li> <li>(iii) Is exiting an institution where (s)he has resided for 90 days or less <u>and</u> who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution</li> </ul>
	<b>Category 2</b>	<b>Imminent Risk of Homelessness</b>	<p>(2) Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ul style="list-style-type: none"> <li>(i) Residence will be lost within 14 days of the date of application for homeless assistance;</li> <li>(ii) No subsequent residence has been identified; <u>and</u></li> <li>(iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing</li> </ul>
	<b>Category 3</b>	<b>Homeless under other Federal statutes</b>	<p>(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:</p> <ul style="list-style-type: none"> <li>(i) Are defined as homeless under the other listed federal statutes;</li> <li>(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;</li> <li>(iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; <u>and</u></li> <li>(iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers</li> </ul>
	<b>Category 4</b>	<b>Fleeing/ Attempting to Flee DV</b>	<p>(4) Any individual or family who:</p> <ul style="list-style-type: none"> <li>(i) Is fleeing, or is attempting to flee, domestic violence;</li> <li>(ii) Has no other residence; <u>and</u></li> <li>(iii) Lacks the resources or support networks to obtain other permanent housing</li> </ul>



# Homeless Definition

## RECORDKEEPING REQUIREMENTS



<p><b>Category 1</b></p>	<p>Literally Homeless</p>	<ul style="list-style-type: none"> <li>• Written observation by the outreach worker; <u>or</u></li> <li>• Written referral by another housing or service provider; <u>or</u></li> <li>• Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;</li>   <li>• For individuals exiting an institution—one of the forms of evidence above <u>and</u>:             <ul style="list-style-type: none"> <li>○ discharge paperwork <u>or</u> written/oral referral, <u>or</u></li> <li>○ written record of intake worker's due diligence to obtain above evidence <u>and</u> certification by individual that they exited institution</li> </ul> </li> </ul>
<p><b>Category 2</b></p>	<p>Imminent Risk of Homelessness</p>	<ul style="list-style-type: none"> <li>• A court order resulting from an eviction action notifying the individual or family that they must leave; <u>or</u></li> <li>• For individual and families leaving a <u>hotel</u> or <u>motel</u>—evidence that they lack the financial resources to stay; <u>or</u></li> <li>• A documented and verified oral statement; <u>and</u></li>   <li>• Certification that no subsequent residence has been identified; <u>and</u></li> <li>• Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing</li> </ul>
<p><b>Category 3</b></p>	<p>Homeless under other Federal statutes</p>	<ul style="list-style-type: none"> <li>• Certification by the nonprofit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; <u>and</u></li> <li>• Certification of no PH in last 60 days; <u>and</u></li> <li>• Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days; <u>and</u></li> <li>• Documentation of special needs <u>or</u> 2 or more barriers</li> </ul>
<p><b>Category 4</b></p>	<p>Fleeing/ Attempting to Flee DV</p>	<ul style="list-style-type: none"> <li>• <i>For victim service providers:</i> <ul style="list-style-type: none"> <li>○ An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.</li> </ul> </li> <li>• <i>For non-victim service providers:</i> <ul style="list-style-type: none"> <li>○ Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; <u>and</u></li> <li>○ Certification by the individual or head of household that no subsequent residence has been identified; <u>and</u></li> <li>○ Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.</li> </ul> </li> </ul>



# At Risk of Homelessness

<b>CRITERIA FOR DEFINING AT RISK OF HOMELESSNESS</b>	<b>Category 1</b>	Individuals and Families	<p>An individual or family who:</p> <ul style="list-style-type: none"> <li>(i) Has an annual income below <u>30%</u> of median family income for the area; <u>AND</u></li> <li>(ii) Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the "homeless" definition; <u>AND</u></li> <li>(iii) Meets one of the following conditions:             <ul style="list-style-type: none"> <li>(A) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; <u>OR</u></li> <li>(B) Is living in the home of another because of economic hardship; <u>OR</u></li> <li>(C) Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; <u>OR</u></li> <li>(D) Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; <u>OR</u></li> <li>(E) Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; <u>OR</u></li> <li>(F) Is exiting a publicly funded institution or system of care; <u>OR</u></li> <li>(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved Con Plan</li> </ul> </li> </ul>
	<b>Category 2</b>	Unaccompanied Children and Youth	A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute
	<b>Category 3</b>	Families with Children and Youth	An unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.





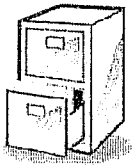
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# Homeless Definition

## RECORDKEEPING REQUIREMENTS



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# Appendix C

## Brief guide to Determining Eligibility for HUD Benefits for Non-Citizens

There are two main laws that need to be considered in examining whether non-citizens are eligible for certain HUD funded programs. Section 214 of the Housing and Community Development Act of 1980 regulates this for some types of HUD programs, and the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) regulates it for other programs. The following is an explanation of these two laws, which programs they regulate, who is eligible for services under these laws and exceptions to these limitations.

### Section 214 of the Housing and Community Development Act of 1980

Section 214 regulates the following HUD funded programs:

1. Section 8 - Rental Certification Program
2. Section 8 - Rental Voucher Program
3. Section 8 - Moderate Rehabilitation Program
4. Public & Indian Housing Programs

According to Section 214, only residents with US citizenship or eligible immigration status can receive any of the benefits listed above. Furthermore there are penalties for ineligible residents who misrepresent their citizenship status in order to claim benefits. Those eligible include the following:

- US Citizens or Nationals
- Lawful Permanent Residents ("Green Card" holders)
- Refugees
- Asylees
- An alien paroled into US
- Aliens whose deportation was deferred due to danger of persecution, post 1996

In addition the Victims of Trafficking & Violence Protection Act of 2000 declared that immigrants who have been officially recognized as **Victims of Trafficking** are eligible for the same benefits as refugees.

**Nondiscrimination:** Note that both Section 214 and PRWORA require that decisions about whether and how to check immigration status of applicants for benefits should not be done in a discriminatory way, based on race, skin color, or perceptions of the national origin of applicants. Furthermore, if it is determined that applicants are not eligible for services based on income or other criteria, their immigration status should not be checked.

**Mixed Families:** Section 214 defines a mixed family as "A family whose members include those with citizenship or eligible immigration status, and those without citizenship or eligible immigration status." As long as either the head of the household or his or her spouse is eligible, a prorated rate of benefit can be calculated based on the proportion of household members who are eligible for the benefit. The names of ineligible members of the family should be listed and kept on file, but they do not have to sign the paper. The agency should not check immigration status for household members who are not claiming to be eligible for the benefit.

The full text of this law can be found at:

<http://www.hud.gov/offices/adm/hudclips/guidebooks/7465.7G/index.cfm>

# Appendix D

## The Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA)

Enacted in 1996, PRWORA was a wide sweeping Welfare Reform Law. Title IV of that law provides that with certain exceptions, only US citizens and eligible noncitizens are eligible for federal, state, and local benefits. The Act required the US Attorney General to issue guidance on the eligibility of aliens for federal public benefits. The text of this guidance can be found at:

[http://www.legalmomentum.org/assets/pdfs/www4\\_4\\_appendix\\_f\\_interim\\_guidance\\_full.pdf](http://www.legalmomentum.org/assets/pdfs/www4_4_appendix_f_interim_guidance_full.pdf)

This guidance applies to HUD funded programs that are not covered by **Section 214 (see page 1 of this document)**.

The list of those eligible for benefits is similar to those in Section 214, with some slight exceptions:

- US Citizens or Nationals
- Lawful Permanent Residents (“Green Card” holders)
- Refugees
- Asylees
- An alien paroled into US for a period of more than one year
- All aliens with deferred deportation
- Cuban/ Haitian Entrants
- Battered immigrants where battery causes the need for the benefit.

In addition, the Victims of Trafficking & Violence Protection Act of 2000 declared that immigrants who have been officially recognized as **Victims of Trafficking** are eligible for the same benefits as refugees.

### **Program exempt from the need to verify status:**

As a part of two determinations by the Attorney General there are several exemptions from the need to verify immigration status.

- **Programs necessary for the protection of life and safety**, as long as they pass the following “three-prong test,” do not need to verify immigration status (*See Federal Register, Vol. 66, No. 10, AG Order No. 2353-2001*). For this exception to apply, the program must:
  1. Deliver In-kind services at the community level through a public or non-profit agency
  2. Not condition the individual’s eligibility for the service on his or her level of income
  3. Provide a service necessary for the protection of life or safety.

Examples for services listed as meeting these criteria are:

- services for victims of domestic violence
  - short-term shelter or housing assistance for the homeless, runaways, or abused children;
  - programs providing services to individuals during disasters or extreme heat or cold.
  - Also exempt are programs which provide service under the Lead Hazard Control program
- **Programs run by non-profit, charitable agencies who receive HUD funding**, can opt-in or opt-out for requirements to verify immigration status (*See Fed. Reg. Vol. 62, No. 221, AG Order No. 2129-97*) Non-profit agencies “dedicated to the relief of the poor and distressed or the underprivileged as well as religiously-affiliated organizations” can choose as a policy not to verify eligibility based on immigration status for *any* of the clients they serve. If they choose to verify immigration status at all, they must verify for everyone in a non-discriminatory manner according to the guidelines of the HUD funded program they are under.

# Appendix E

## DEFINITIONS FOR LANCASTER COUNTY WRITTEN STANDARDS AND POLICIES

**Coordinated Assessment** means a coordinated process designed to coordinate program participant intake assessment and provision of referrals. It must be well advertised and include a standardized assessment tool. The definition is found at 24 CFR 578.3

### **Chronically Homeless**

(a) An individual who:

- i. Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
- ii. Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years; and
- iii. Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability;

(b) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition [as described in Section I.D.2.(a) of this Notice], before entering that facility; or

(c) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) of this definition [as described in Section I.D.2.(a) of this Notice, including a family whose composition has fluctuated while the head of household has been homeless.

**Continuum of Care** (defined in 24 CFR 576.2) The Continuum of Care means the group composed of representatives of relevant organizations to plan for and provide, as necessary, a system of outreach, engagement, and assessment; emergency shelter; rapid re-housing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless persons for Lancaster County and City. In Lancaster County and City that group is the Lancaster County Coalition to End Homelessness.

**Diversions** is a strategy that prevents homelessness for people seeking shelter by helping them identify immediate alternate housing arrangements and, if necessary, connecting them with services and financial assistance to help them return to permanent housing.

**Emergency shelter** (defined in 24 CFR 576.2) Any facility whose primary purpose is to provide a temporary shelter for the homeless in general or for a specific population of the homeless and which does not require occupants to sign leases or occupancy agreements.

**Fair Market Rents** are published in the Federal Register annually by HUD. They are required for ESG programs at 24 CFR 576.106(d).

**Financial Assistance** Eligible activities under the heading of Financial Assistance are rental application fees, security deposits, last month's rent, utility deposits, utility payments, and moving costs

**Harm Reduction** is a case management model aimed at reducing negative consequences associated with drug use but does not condone or condemn drug use.

**Housing First** is an approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as income, sobriety, treatment or service participation requirements. Supportive services are offered to maximize housing stability and prevent returns to homelessness.

**Housing Management Information System (HMIS)** HMIS means the information system designated by the CoC to comply with the HUD's data standards and used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. (Reference 24 CFR 576.400(f) for more details)

**Housing Standards** as defined at 24 CFR 576.403(c) They are minimum standards for permanent housing. ESG funds cannot be used to help a program participant remain or move into housing that does not meet the minimum habitability standards. These standards relate to structure and materials, space and security, interior air quality, water supply, sanitary facilities, thermal environment, illumination and electricity, food preparation, sanitary conditions and fire safety.

**Lancaster County Coalition to End Homelessness.** Also referred to as the CoC or Continuum of Care for Lancaster County. The LCCEH was created to coordinate the efforts to eliminate homelessness and the causes of homelessness through advocacy, planning and coordinating activities, public education, and community organizing. More information can be found at [www.lcceh.org](http://www.lcceh.org).

**Lead Based paint** requirements are listed at 24 CFR 576.403(a). The Lead-Based Paint Poisoning Prevention Act ([42 U.S.C. 4821-4846](http://www.uscourts.gov/42-usc-4821-4846)), the Residential Lead-Based Paint Hazard Reduction Act of 1992 ([42 U.S.C. 4851-4856](http://www.uscourts.gov/42-usc-4851-4856)), and implementing regulations in 24 CFR part [35](http://www.ecfr.gov/24-cfr-35), subparts A, B, H, J, K, M, and R apply to all shelters assisted under ESG program and all housing occupied by program participants.

**Leverage** means the total amount of non-governmental resources (both cash and non-cash) committed from all sources to the project. This includes both your "match".

**Mainstream benefits** generally refer to resources such as Medicaid, the State Children's Health Insurance Program (S-CHIP), food stamps, Temporary Aid for Needy Families (TANF), Supplemental Security Income (SSI), the Workforce Investment Act (WIA), the Substance Abuse Block Grant, the Mental Health Block Grant, the Social Services Block Grant, and Welfare-to-Work.

**Match** is the amount of cash that must be raised for the project from other sources in order to earn the federal contribution to the project. Match is defined in 24 CFR 576.201. All ESG funds must be met by an amount that equals the amount of ESG funds provided by HUD.

**Permanent housing** means community-based housing without a designated length of stay, and includes both permanent supportive housing and rapid re-housing. To be permanent housing, the program participant must be the tenant on the lease for a term of at least one year, which is renewable for terms that are a minimum of one month long, and is terminable only for cause.

**Permanent Supportive Housing** means permanent housing in which supportive services are provided to assist homeless persons with a disability to live independently.

**Point-in-time count** means a count of sheltered and unsheltered homeless persons carried out on one night in the last 10 calendar days of January or at such other time as required by HUD.

**Rent reasonableness** is required at 24 CFR 576.106.(d). It is defined at 24 CFR Part 888.

**Rental Assistance** Eligible activities under Rental Assistance activities are short-term rental assistance, medium-term rental assistance and rental arrears.

**Rental Assistance Agreement.** This is defined at 24 CFR 576.106. The recipient or subrecipient may make rental assistance payments only to an owner with whom the recipient or subrecipient has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the recipient or subrecipient a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant.

**Transitional housing** means housing, where all program participants have signed a lease or occupancy agreement, the purpose of which is to facilitate the movement of homeless individuals and families into permanent housing within 24 months or such longer period as HUD determines necessary. The program participants must have a lease or occupancy agreement for a term of at least one month that ends in 24 months and cannot be extended.

**Victim service provider** means a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women's shelters, domestic violence transitional housing program and other programs.



## **Acronyms**

**CHART** – Community Homeless Assessment and Referral Team. This is the name of the coordinated assessment effort in Lancaster County and City. See definition of coordinated assessment above.

**CoC** – Continuum of Care. See definition above.

**ESG** – Emergency Solutions Grant – a federal grant allocated by formula to eligible areas. The County of Lancaster and the City of Lancaster both receive annual allocations of ESG funds.

**BHDS** – Behavioral Health and Development Services – The County department that addresses the needs of persons with mental illness and developmental disabilities.

**HUD** – U.S. Department of Housing and Urban Development – a federal agency that distributes several funding programs designed to improve community and economic development, including homelessness.

**HMIS** - Housing Management Information System. See definition above.

**PIT** – See definition above

**PSH** – Permanent Supportive Housing

# Appendix F

## Lancaster County Coalition to End Homelessness Prioritization Policy

### *Helping Those First That Need It The Most.*

PURPOSE: The HEARTH Act requires the Lancaster County Continuum of Care (CoC) to have written policies and procedures that govern the provision of assistance to individuals and families under the federally funded Continuum of Care programs in the City of Lancaster and the surrounding Lancaster County (24 CFR 576.400(e)). One of the policies within these performance standards and policies is the Prioritization Policy. This policy will provide guidance to local providers in administering homeless assistance in prioritizing individuals for service and housing based on their need. These policies are consistent with the HUD Notice *CPD-14-012: Prioritizing Persons Experiencing Chronic Homelessness in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status.*

i. Priorities:

1. **First Priority:** Homeless Individuals and Families with a Disability with the Most Severe Service Needs. An individual or family that is eligible for CoC Program-funded PSH who has been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter for any period of time, including persons exiting an institution where they have resided for 90 days or less, but were living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately prior to entering the institution and has been identified as having the most severe service needs.
2. **Second Priority:** Homeless Individuals and Families with a disability with a Long Period of Continuous or Episodic Homelessness. An individual or family that is eligible for CoC Program-funded PSH who has been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least 6 months or on at least three separate occasions in the last 3 years where the cumulative total is at least 6 months. This includes persons exiting an institution where they have resided for 90 days or less but were living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately prior to entering the institution and had been living or residing in one of those locations for at least 6 months or on at least three separate occasions in the last 3 years where the cumulative total is at least 6 months.
3. **Third Priority:** Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Havens, or Emergency Shelters. An individual or family that is eligible for CoC Program-funded PSH who has been living in a place not meant for human habitation, a safe haven, or an emergency shelter. This includes persons exiting an institution where they have resided for over 90 days or less but were

living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately prior to entering the institution.

4. **Fourth Priority:** Homeless Individuals and Families with a Disability Coming from Transitional Housing. An individual or family that is eligible for CoC program-funded PSH who is coming from transitional housing, where prior to residing in transitional housing lived on the streets or in an emergency shelter, or a safe haven. This priority also includes homeless individuals and homeless households with children with a qualifying disability who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and are living in transitional housing- all are eligible for PSH even if they did not live on the streets, emergency shelters, or in safe havens prior to entry in the transitional housing.

### Eligibility

#### All

- No additional requirements allowed beyond those of funders.
- Any requirements stipulated by funders would apply.

#### Emergency Shelter

- Only refer people to emergency shelter if all attempts at diversion have failed.
- Must be:
  - literally homeless; and
  - Can be safely maintained in a shelter, and
  - Not in need of emergency medical or psychiatric services or danger to self or others, and
- Cannot discriminate per HUD regulations (24 CFR 5.105(a)), no requirements for identification, income, employment and transgender placement based on client's gender identification.

#### Transitional Housing

- Only for clients for whom all efforts at rapid-re-housing have not resulted in placement in permanent housing within 3 months.
- Clients must come from emergency shelters and streets only.
- If in treatment, must have been in emergency shelter or on streets prior to treatment.
- In rare cases, can be used for persons on the waiting list for permanent supportive housing and awaiting vacancy (through coordinated access protocols).

#### Rapid Re-housing

- Unsheltered households, or sheltered households that are unable to attain their own housing within 10 days AND
- No sobriety requirements

- Use progressive engagement concept

#### Permanent Supportive Housing (PSH)

- Most vulnerable chronically homeless clients as defined in CPD Notice 14-012, *or*
- Clients who cannot be diverted, *and*
- Coming from streets or shelters, *and*
- Has a disability that requires support services to maintain housing and meet lease obligations, *and*
- Has high score on the vulnerability index, and
- a history of high utilization of services, i.e. hospitalizations, incarcerations, detox programs, foster care placement, etc.

#### Targeting

##### Transitional housing

- No income, *or*
- 2 or more homeless episodes in the past 3 years (defined as an exit from the homeless system of at least 30 days), *or*
- Coming from treatment program but homeless prior to entering treatment.

##### Permanent Supportive Housing

- Persons meeting the HUD definition of chronically homeless shall be prioritized first.
- Chronically homeless persons with the longest histories of living on the streets and/or in shelters shall be prioritized.

##### Rapid Re-housing

- Households fleeing domestic violence,
- People coming out of prison, *or*
- People who have applied for SSI or SSDI but have not received approval for benefits.

# Appendix G

## Rapid Re-Housing Performance Benchmarks and Program Standards

### Introduction

Rapid re-housing is an intervention designed to help individuals and families to quickly exit homelessness, return to housing in the community, and not become homeless again in the near term. The [core components of a rapid re-housing program](#) are housing identification, move-in and rent assistance, and rapid re-housing case management and services. These core components represent the minimum that a program must be providing to households to be considered a rapid re-housing program, but do not provide guidance for what constitutes an *effective* rapid re-housing program.

This document provides details on performance benchmarks that would qualify a program as effective. These benchmarks are accompanied by qualitative program standards for each of the rapid re-housing core components that are likely to help a program meet the performance benchmarks. Lastly, this document includes a section on program philosophy and design standards that provide more guidance on the broader role a rapid re-housing program should play in ending homelessness.

The standards included in this document are based on what is currently considered promising practice by the National Alliance to End Homelessness, the U.S. Department of Veteran Affairs (VA), the U.S. Department of Housing and Urban Development (HUD), U.S. Interagency Council on Homelessness (USICH), Abt Associates and other federal technical assistance providers, and nationally recognized, high-performing rapid re-housing providers.<sup>1</sup> As rapid re-housing practice continues to evolve, these program standards will be updated. This living document is intended to be a tool to help current and potential rapid re-housing providers, funders, and other stakeholders design and identify rapid re-housing programs that are or are likely to be the most successful in ending homelessness for individuals and families through the use of the three core components of rapid re-housing.

### How to Use this Document

**Funder, State Leaders, and Coalitions** can use the performance benchmarks and program standards to increase the effective implementation of rapid re-housing. These standards can be used in the development of Requests For Proposals (RFPs) for a variety of funding streams and to set performance and outcome goals for programs, evaluate applications for new rapid re-housing programs and determine which organizations are best suited to provide rapid re-housing, and review current program performance.

**Providers** can use these standards to improve their own rapid re-housing practice and to evaluate possible rapid re-housing partner agencies. These benchmarks and standards provide clear goals for programs implementing the model and interested in improving practice.

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<sup>1</sup> CARF and COA have also developed rapid re-housing standards. The standards included in this document do not conflict with the standards published by CARF or COA.

**Continuums of Care (CoCs)** can use these standards during the process of developing written standards for how they plan to administer assistance through coordinated assessment. CoCs must develop standards for providing assistance including prioritizing who receives rapid re-housing and how much rent participants in a rapid re-housing program must pay. While recommendations for such standards as required by HUD are not included in this document, these standards can help inform their development and ensure that rapid re-housing programs in CoCs are applied effectively and efficiently.

## Performance Benchmarks

Ultimately the effectiveness of a rapid re-housing program is determined based on a program's ability to accomplish the model's three primary goals:

- Reduce the length of time program participants spend homeless,
- Exit households to permanent housing, and
- Limit returns to homelessness within a year of program exit.

Benchmarks for performance on the above outcomes are detailed below. When examining a program's ability to meet the benchmarks, it is important to remember that rapid re-housing is a Housing First intervention, meaning, among other things, that programs should not be screening out households based on criteria that are *assumed* to predict successful outcomes, such as income, employment, criminal history, mental health history, medical history, or evidence of "motivation." The benchmarks detailed below are based on performance data of programs that *do not* screen households out on the basis of the above barriers. Programs assisting individuals and families with high housing barriers are able to achieve these outcomes. It should also be noted that one of the program standards included below is that a program does not screen out households on the basis of the above barriers, so a program that met the performance benchmark, would still not meet the accompanying program standards if it was screening out households for those reasons. It may be necessary for rapid re-housing programs to have some prevention capacity to serve high barrier households after placement. It is a possibility that some households that are rapid re-housed will need periodic support to avoid a return to homelessness.

When using these performance benchmarks for program evaluation and purposes of comparison between programs, a community may not have any programs that meet these benchmarks despite meeting the program standards, particularly in extremely expensive or low-vacancy housing markets or if programs are primarily serving households with zero income and/or higher housing barriers. While programs should continue to strive for these benchmarks, funders can use performance on these benchmarks as an opportunity to assess relative effectiveness between programs and to undertake performance improvement efforts, including assessing barriers to better performance and performance improvement planning. The performance benchmarks also provide a baseline from which funders can establish performance improvement goals and performance-based contracting standards.

All of the below performance outcomes can be measured using data in a community's Homeless Management Information System (HMIS). As such, to accurately measure whether a benchmark has been met, CoCs need to have high participation rates of targeted homeless assistance programs and individual programs must be entering high quality data in a community's HMIS. A rapid re-housing

provider who is also a domestic violence provider would not participate in a community's HMIS. Thus, in order to be able to calculate the performance benchmarks, that provider would be required to use an alternative, equivalent method that collects all of the necessary data points.

Programs that have not been operating for a year will not have sufficient data to meet all of the performance benchmarks, but these programs can meet the accompanying program standards, which are intended to design programs that do achieve the benchmarks and are detailed later in this document. Additionally, in the first several months of operations, providers may need time to bring operations to scale and reach full capacity.

### ***Performance Benchmark #1: Reduce the length of time program participants spend homeless***

The first goal of rapid re-housing is to reduce the amount of time individuals and families spend homeless. The primary opportunity for a rapid re-housing program to impact how much time a household spends homeless is the speed with which it is able to identify and help households access appropriate housing options. Activities that contribute to good performance on this outcome are recruiting landlords to have access to units, finding units that are in the communities and neighborhoods that program participants want to live in, and negotiating with landlords to help program participants access housing (see [Housing Identification Program Standards](#)).

**For a program to meet this performance benchmark, households served by the program should move into permanent housing in an average of 30 days or less.**

This measure is the average length of time between the date when an individual or family is identified as having entered a rapid re-housing program (HMIS rapid re-housing program entry date) to when they move into permanent housing (HMIS residential move-in date). This measure is only calculated for those households that move into a permanent housing destination and does not include those who have not yet moved in or move into a non-permanent housing destination.

$$\text{Average} = \frac{\text{Sum of number of days from program entry to move in date for all households}}{\text{Total number of households}}$$

Permanent housing may include private, unsubsidized housing; subsidized housing; permanent supportive housing; or housing shared with friends or family in a sustainable living situation (one **that should** not be categorized as "temporary"). Permanent housing does not include shelter, a transitional housing program, jail or prison, or a treatment facility.

Reminder: A community may not have any programs that meet this benchmark, particularly in extremely expensive or low-vacancy housing markets. Funders and programs may want to set alternate performance goals for the purposes of comparison between programs or performance improvement while programs work to achieve these benchmarks.

### ***Performance Benchmark #2: Permanent housing success rates***

The second goal of a rapid re-housing program is to exit households to permanent housing in the community with or without a subsidy. A rapid re-housing program can impact permanent housing success through the combination of an appropriate housing placement, financial assistance, and

effective case management and services (see [Housing Identification](#), [Rent and Move-In Assistance](#), and [Rapid Re-Housing Case Management Program Standards](#))

**For a program to meet this performance benchmark, at least 80 percent of households that exit a rapid re-housing program should exit to permanent housing.**

This measure is calculated by taking the number of households who were in permanent housing when they exited the rapid re-housing program (HMIS rapid re-housing program exit date and destination at exit) and dividing by all of the households who exited the rapid re-housing program regardless of destination over the same period of time. This figure should be calculated for households exiting the rapid re-housing program over the preceding 12 month period. A program working on performance improvement, may wish measure this for shorter intervals.

$$\text{Percent} = \left( \frac{\text{Total number of households exited to permanent housing during a time period}}{\text{Total number of households that exited program during same time period}} \right) 100$$

Permanent housing may include private, unsubsidized housing; subsidized housing; permanent supportive housing; or housing shared with friends or family in a sustainable living situation (one that should not be categorized as “temporary”). Permanent housing does not include shelter, a transitional housing program, jail or prison, or a treatment.

Reminder: A community may not have any programs that meet this benchmark, particularly if programs are primarily serving households with zero income and/or higher housing barriers. Funders and programs may want to set alternate performance goals for the purposes of comparison between programs or performance improvement while programs work to achieve these benchmarks.

### ***Performance Benchmark #3: Returns to Homelessness***

The third goal of a rapid re-housing program is to reduce the number of households returning to homelessness following soon after an exit from a rapid re-housing program. The primary opportunities for a rapid re-housing program to impact the success of a household in remaining housed is through the combination of securing appropriate housing and effective case management and services (see [Housing Identification](#) and [Rapid Re-Housing Case Management Program Standards](#)).

**For a program to meet this performance benchmark, at least 85 percent of households that exit a rapid re-housing program to permanent housing should not become homeless again within a year.**

This is typically measured by examining HMIS data from homeless programs across the entire community to determine whether people who successfully exit from the rapid re-housing program to permanent housing returned to homelessness, meaning an unsheltered location, emergency shelter, transitional housing, or a Safe Haven, within 12 months of exiting.

$$\text{Percent} = \left( \frac{\text{Total number of households who did NOT return to homelessness during time period}}{\text{Total number of households exited to permanent housing during the same time period}} \right) 100$$

Programs operating for less than a year will not be able to meet this benchmark. Additionally, to calculate this measure, programs must have access to homeless system data for all other programs in the community (open data system) or the ability to access an HMIS report from their community’s HMIS



lead agency. For a program in a community without open or adequate HMIS coverage (at least 80 percent of programs entering data), and for a rapid re-housing provider who is also a domestic violence provider, this measure can be calculated using an alternative, equivalent method to document the program's ability to meet the standards such as follow up with a representative sample of households that exit to permanent housing.

This measure of returns to homelessness tracks the percentage of households who do not experience a subsequent episode of homelessness. If a household receives some type of emergency or permanent housing assistance, but does not experience another episode of homeless, then they should be considered a household that did not return to homelessness for the purpose of this performance benchmark. And, if a household moves from one permanent housing situation to another permanent housing situation or doubled up situation without another episode of homelessness in-between moves, it is also considered a household that did not return to homelessness for the purpose of this measure.

Reminder: A community may not have any programs that meet this benchmark, particularly if programs are primarily serving households with zero income and/or higher housing barriers. Funders and programs may want to set alternate performance goals for the purposes of comparison between programs or performance improvement while programs work to achieve these benchmarks.

## Core Component Program Standards

The [core components for rapid re-housing](#) were developed in collaboration with, and endorsed by, the United States Interagency Council on Homelessness (USICH), the Department of Housing and Urban Development (HUD), and the Department of Veterans Affairs (VA). While a household that is rapidly re-housed is not required to utilize all three core components, in order to meet the program standards in this document, a rapid re-housing program must *offer* program participants all three core components: housing identification, move-in and rent assistance, and rapid re-housing case management and services. The core components can be provided by a single agency or in partnership with other agencies and still meet these program standards.

Program standards are detailed below for each of the three core components. These standards are accompanied by principles and a rationale on which the standards are based as well as examples of how a program may meet those standards.

### *Housing Identification*

Housing Identification is the first core component of rapid re-housing, the goal of which is to find housing for program participants quickly. Activities under this core component include recruiting landlords with units in the communities and neighborhoods where program participants want to live and negotiating with landlords to help program participants access housing.

#### Principles

- Within the limits of the participant's income, a rapid re-housing program should have the ability to help households access units that are desirable and sustainable—those that are in neighborhoods where they want to live in, that have access to transportation, are close to employment, and that are safe.
- Housing identification efforts should be designed and implemented to actively recruit and retain landlords and housing managers willing to rent to program participants who may otherwise fail to pass typical tenant screening criteria.
- Critical to the formation of landlord-program relationship is the recognition of the landlord as a vital partner. The RRH provider must be responsive to landlords to preserve and develop those partnerships for the purposes future housing placements.

#### Rationale

One of the primary activities under housing identification is the recruitment of landlords as landlord recruitment and support is essential to program participants having rapid access to permanent housing from the moment they enter the program. The more partnerships with landlords the program has developed, the more opportunities program participants have to rapidly obtain permanent housing. As landlords experience the benefits of a partnership with rapid re-housing programs, they may give preference to program participants or even be willing to occasionally consider some reduction in rent or an occasional late payment.

Without landlord screening concessions, many program participants would be denied many housing opportunities due to their income, housing, credit and/or criminal histories. Landlords are often willing to waive some or all screening requirements because the program staff will communicate with the landlord and tenant and will resolve tenancy problems as soon as possible if and when they arise. Some programs also promise limited vacancy periods between tenants, or double security deposits to persuade landlords to rent to tenants who appear to be higher risk.

At the same time, the program must also be knowledgeable about landlord responsibilities to protect households served by the program. Programs should not knowingly place households with negligent landlords and should help households understand tenant and landlord rights and responsibilities.

Beyond landlord recruitment, programs must also match households to appropriate housing—housing for which they will be able to pay the rent after financial assistance ends; that is decent; and, that is safe, including meeting the particular safety needs of survivors of domestic violence. Effective programs accomplish this by providing a variety of housing options in a variety of neighborhoods and by serving as a resource to households during the housing search, location, and application processes.

### **Housing Identification Program Standards (H1. – H9.)**

#### *Program Staffing*

H1. Program designates staff whose responsibility is to identify and recruit landlords and encourage them to rent to homeless households served by the program. Staff have the knowledge, skills, and agency resources to: understand landlords' perspectives, understand landlord and tenant rights and responsibilities, and negotiate landlord supports. A program may have dedicated staff for whom this is the primary responsibility. If a program does not have a dedicated staff person(s) who performs this function, case manager job descriptions must include responsibilities including landlord recruitment and negotiation and at least some of the program's case managers must be trained in this specialized skill set to perform the recruitment function effectively.

H2. Staff are trained on housing identification, landlord tenant rights and responsibilities, and other core competencies as well as the wider array of housing assistance available within a community. Program has routine ways to onboard new staff and to keep staff regularly updated on new strategies, policies, and housing assistance options in the community.

#### *Program Policies*

H3. Program has written policies and procedures for landlord recruitment activities, including screening out potential landlord partners who have a history of poor compliance with their legal responsibilities and fair housing practices.

H4. Program offers a standard, basic level of support to all landlords who lease to program participants. This support is detailed in a written policy distributed to landlords. Program can negotiate additional supports, as needed, on a case-by-case basis. At a minimum, this policy specifies that program staff:

H4a. Respond quickly (within one business day) to landlord calls about serious tenancy problems;

H4b. Seek to resolving conflicts around lease requirements, complaints by other tenants, and timely rent payments; and

H4c. Whenever possible, negotiate move-out terms and assist the person/household to quickly locate and move into another unit without an eviction (see [Rapid Re-Housing Case Management Program Standard C15.](#)).

H5. Program has a detailed policy for the type of assistance provided to help households find and secure housing. Staff explain and distribute this policy to households at entry to the program. Some households may decline assistance in finding housing, but the program checks on their progress and offers advice and/or direct assistance if they encounter obstacles they cannot resolve independently.

H5. Program has a written policy requiring staff to explain to participants basic landlord-tenant rights and responsibilities and the requirements of their specific lease.

#### *Program Activities*

H6. Program continually engages in the recruitment and retention of landlord partners and has methods of tracking landlord partners and unit vacancies, unit locations, characteristics, and costs.

H7. Program provides participants with multiple housing choices within practical constraints. The onus is on the program to provide these housing choices, but this does not preclude program participants from conducting their own search and choosing housing they identify independently.

H8. Program assists participants in making an informed housing choice with the goal that the participant will be able to maintain after program exit, even when the household will experience high housing cost burden. While, participants ultimately chose their housing unit, a program uses housing and budgeting plans that help a participant understand the likelihood of being able to pay rent and meet the requirements of the lease by the end of assistance. For extremely low income households, there should be reasonable projections and expectations and due diligence on the program's part to help participants secure income (through employment, public benefits, and/or on-going rental assistance) at program exit (see [Rapid Re-Housing Case Management Program Standards C18.-C20.](#)).

H9. When closing a case, program provides information to landlords about how they can contact the program again if needed and what kind of follow-up assistance may be available.

## Examples of Meeting Program Standards: Housing Identification

Programs that meet the above standards include those that:

- Employ “Housing Location” staff who have experience working with and negotiating leases with local landlords.
- Recruit landlords through word of mouth; cold outreach to posted ads; driving around prospective neighborhoods looking for FOR RENT signs; soliciting references from partners; Craigslist and other websites, other media; and/or through presentations at local service clubs, religious organizations, and landlord associations, and collaborative approaches with local elected officials and government agencies.
- Provide contact information to landlords to reach appropriate staff, respond to landlord calls within one business day, mediate disputes between program participants and landlords, pay for damage caused to units, and assure rental payments are made on time.
- Contact local tenant rights organizations to identify landlords who fail to comply with licensing/building requirements and/or fail to correct violations; review housing court records; and/or survey program participants about their satisfaction with landlords to identify patterns in landlord behavior that would suggest they should not be program partners.
- Be familiar with the screening information landlords collect to identify prospective tenants. This information can help match program participants with landlords and units.

## ***Rent and Move-In Assistance***

Rent and Move-In Assistance is the second core component of rapid re-housing, the goal of which is to provide short-term help to households so they can pay for housing. Activities under this core component include paying for security deposits, move-in expenses, rent, and utilities.

### **Principles**

- Rent and move-in assistance should be flexible and tailored to the varying and changing needs of a household while providing the assistance necessary for households to move immediately out of homelessness and to stabilize in permanent housing.
- A rapid re-housing program should make efforts to maximize the number of households it is able to serve by providing households with the financial assistance in a progressive manner, providing only the assistance necessary to stabilize in permanent housing.

### **Rationale**

The intent of the rent and move-in assistance component of rapid re-housing is to enable the quick resolution of the immediate housing crisis. The majority of RRH participants will be able to maintain housing with short-term rent assistance. Programs should start out by assuming households, even those with zero income or other barriers, will succeed with a minimal subsidy and support rather than a long subsidy, and extend these if/when necessary. Households with higher housing barriers or no income may need assistance for different depths or durations, but such households should still be assisted in immediately attaining permanent housing and the large majority will still successfully exit to permanent housing.

Programs should be attentive to the ability of a household to maintain housing once subsidy ends, but should not be entirely constrained by attempts to reach a rent burden of only 30 percent of a participant's income—a standard that is not achieved by the majority of low-income and poor households. Instead, they should recognize that once housed, the RRH households will be much better positioned to increase their incomes and address their other needs.

Additionally, by not over-serving households, programs can maximize the impact of available resources to serve the largest number of people possible. The flexible nature of the rapid re-housing program model enables agencies to be responsive to the varied and changing needs of program participants and the community as a whole.

### **Rent and Move-In Assistance Program Standards (R1. – R9.)**

#### ***Program Staff***

R1. Program staff are trained on regulatory requirements of all rapid re-housing funding streams and on the ethical use and application of a program's financial assistance policies, including, but not limited to initial and ongoing eligibility criteria, program requirements, and assistance maximums. Program has a routine way to onboard new staff and to keep staff regularly updated on changing regulations and/or program policies.

### *Program Policies*

R2. Program has clearly defined policies and procedures for determining the amount of financial assistance provided to a participant, as well as defined and objective standards for when case management and financial assistance should continue and end. Guidelines are flexible enough to respond to the varied and changing needs of program participants, including participants with zero income.

R3. If participants are expected to pay an amount toward their housing, program has written policy and procedures for determining that amount, and it must be an amount that is reasonable for their income (this could be up to 50-60 percent of income), including \$0 for those with no current income.

R4. A progressive approach is used to determine the duration and amount of rent assistance. Financial assistance is not a standard “package” and is flexible enough to adjust to households’ unique needs and resources, especially as participants’ financial circumstances or housing costs change. Policies detailing this progressive approach include clear and fair decision guidelines and processes for reassessment for the continuation and amount of financial assistance. Policies and procedures also detail when and how rapid re-housing assistance is used as a bridge to a permanent subsidy or permanent supportive housing placement.

### *Program Activities*

R5. Program provides when needed—either directly or through formal agreement with another organization or agency—financial assistance for housing costs, which may include rental deposits, first month’s rent, last month’s rent, temporary rental assistance, and/or utility assistance.

R6. Program issues checks quickly and on time and has the capacity to track payments to landlords and other vendors.

R7. Program has the capacity to pay reasonable back rent and utility arrears that directly prevent a participant from being able to sign a lease.

R8. Program helps participants meet basic needs at move-in, such as securing basic furnishings for an apartment, including mattresses and basic kitchen items such as a pot for cooking and utensils.

R9. The transition off financial assistance is coordinated with case management efforts to assist program participants to assume and sustain their housing costs (see [Rapid Re-Housing Case Management and Services Program Standards C18.-C20., C24.](#)).

## Examples of Meeting Program Standards: Rent and Move-In Assistance

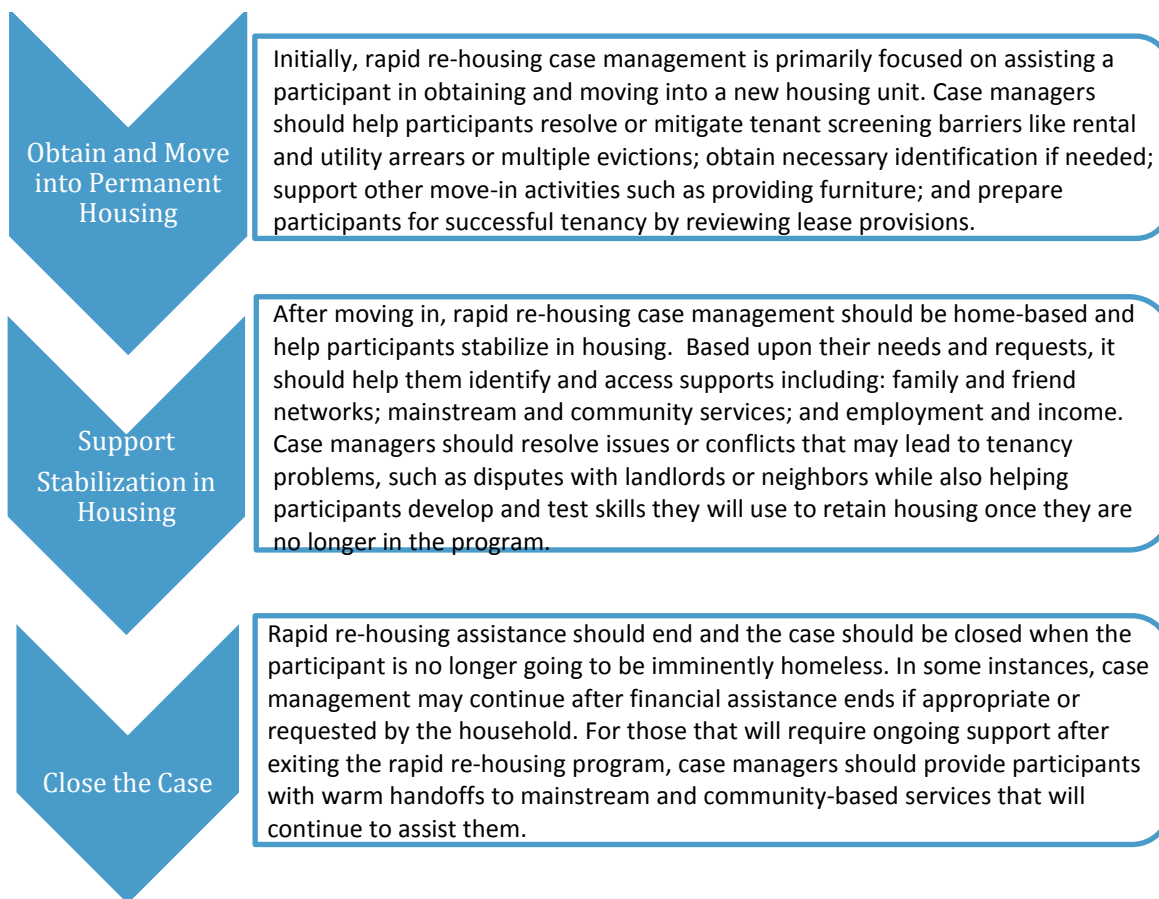
Programs that meet the above standards include those that:

- Utilize income-based, shallow and/or deep subsidy structures that expect clients with income to contribute toward their rent and other costs, and that move as quickly as appropriate to reduce or end subsidies.
- Have a policy they provide to program participants that says assistance is determined based on individualized housing plans/case plans/participant goals and needs, and also makes clear any limits to financial assistance required by their funder(s) or established by the program.
- Have established processes for approval, review, and modification of types/levels of financial assistance.
- Have policies that inform clients that the program is intended to be of short duration, and practices that encourage clients to think of themselves as capable of sustaining their housing and that reduce reliance on the program.
- Have policies that reduce or end subsidies whenever appropriate, leaving open the possibility that a household may return for more assistance, rather than continuing support.



## Rapid Re-housing Case Management and Services

Rapid re-housing case management and services is the third core component of rapid re-housing. The goals of rapid re-housing case management is to help participants obtain and move into permanent housing, support participants to stabilize in housing, and connect them to community and mainstream services and supports if needed.



## Principles

- Rapid re-housing case management should be client-driven. Case managers should actively engage participants in voluntary case management and service participation by creating an environment in which the participant is driving the case planning and goal-setting based on what they want from the program and services, rather than on what the case manager decides they need to do to be successful.
- Rapid re-housing case management should be flexible in intensity—offering only essential assistance until or unless the participant demonstrates the need for or requests additional help. The intensity and duration of case management is based on the needs of individual households and may lessen or increase over time.

- Rapid re-housing case management uses a strengths-based approach to empower clients. Case managers identify the inherent strengths of a person or family instead of diagnoses or deficits, then build on those strengths to empower the household to succeed.
- Rapid re-housing program case management reflects the short-term nature of the rapid re-housing assistance. It focuses on housing retention and helping a household build a support network outside of the program. It connects the participant with community resources and service options, such as legal services, health care, vocational assistance, transportation, child care, and other forms of assistance, that continue beyond participation in the rapid re-housing program.

## **Rationale**

Rapid re-housing is a short-term crisis intervention. As such, the intent of rapid re-housing case management is not to build a long-term services relationship, but instead to assist a household in accessing and stabilizing in a housing unit. Because of that, case management focuses on navigating barriers to tenancy and helping participants to build a support system. It does the latter by identifying and connecting them with community supports, including services and mainstream resources as well as family and friend networks so they have support to work through issues that may have contributed to their original housing instability. Programs should not initially assume all participants need multiple services, but wait until a need is demonstrated and/or expressed by the participant. Staff should be able to increase supports as needed to help program participants. In instances when a household's situation is more complex and they want longer-term supports to retain their housing, a program must be able to connect households to community and mainstream services to enable longer-term assistance.

## **Rapid Re-Housing Case Management and Services Program Standards (C1. – C24.)**

### *Program Staff*

- C1. Case manager's job descriptions direct case managers to focus on housing and to use strengths-based practices focused on participant engagement and meeting the unique needs of each household.
- C2. In programs that have specialized staff that conduct housing location (see [Housing Identification Program Standard H1.](#)), case managers work closely with housing locator staff to match the client to an appropriate unit as quickly as possible.
- C3. Case managers are trained on rapid re-housing case management strategies and related evidence-based practices as well as program policies and community resources. Additionally, a program has a regular process for onboarding new staff and regularly updating the training of current staff.

### *Program Policies*

- C4. Except where dictated by the funder, program participants direct when, where, and how often case management meetings occur. Meetings occur in a participant's home and/or in a location of the participant's choosing whenever possible.

C5. Case managers respect a program participant's home as their own, scheduling appointments ahead of time, only entering when invited in, and respecting the program participant's personal property and wishes while in their home.

C6. When case management and service compliance is not mandated by federal or state regulation, services offered by a program have voluntary participation.

C7. Program has clear safety procedures for home visits that staff are trained on and that are posted clearly visible in office space and shared with program participants at intake, and shared with participants and staff whenever changes are made.

C8. Program has clearly defined relationships with employment and income programs that it can connect program participants to when appropriate.

C9. Program has clearly defined policies and objective standards for when case management should continue and end. These guidelines are flexible enough to respond to the varied and changing needs of program participants. In instances where cases are continued outside of these defined policies and objective standards, there is a review and approval process.

#### *Program Activities*

Program activities for rapid re-housing case management are grouped into categories that will contribute to the specific goals of rapid re-housing case management. The program activities listed here are not exclusively provided in a linear progression and can be administered in whatever order and intensity is most appropriate for a participant.

#### Obtain and Move into Permanent Housing

C10. At enrollment or within 72 hours of enrollment, program conducts a tenancy barriers assessment—not for the purpose of screening out a participant, but to quickly address any such barriers, help direct and navigate the housing search and contribute to landlord negotiation efforts. Any other assessments completed prior to housing are limited and focus on those things necessary to support health and safety and resolve the housing crisis as quickly as possible.

C11. Program has resources and/or be able to connect participants to community resources that help participants: resolve or navigate tenant problems (like rental and utility arrears or multiple evictions) that landlords may screen for on rental applications; obtain necessary documentation such as identification; prepare participants for successful tenancy by reviewing lease provisions; and support other move-in activities such as providing furniture.

C12. Programs offers basic tenancy skills learning opportunities which can include instruction or guidance on basic landlord-tenant rights and responsibilities, requirements and prohibitions of a lease, and meeting minimum expectations for care of the housing unit, such as not causing damage (See [Housing Identification Program Standard H5](#)).

#### Support Stabilization in Housing

C13. Program staff work directly with the participant and landlord to resolve tenancy issues without threatening the participant's tenancy. The issue might be failure to pay rent, not properly maintaining

the unit, or disturbing the quiet enjoyment of others. It also may include a landlord not meeting his/her obligations. Program works quickly to identify a corrective course of action, and, without breaking a participant's confidentiality, keep the landlord and participant informed about the program's action to mitigate the situation.

C14. When appropriate, case managers work with participants to build their communication skills to better respond to or negotiate with a landlord. This might relate to repairs; an extension on a rent payment; or complaints against the tenant concerning noise, odors, trash, or the behavior of children or guests, for example.

C15. When necessary, case managers help participants avoid evictions before they happen, and maintain a positive relationship with the landlord. This can be done by moving a household into a different unit prior to eviction and possibly identifying a new tenant household for the landlord's unit (See [Housing Identification Program Standard H4](#)).

C16. Housing plans, sometimes known as case plans or goal plans, focus on how program participants can maintain a lease and address barriers to housing retention, including maximizing their ability to pay rent; improving understanding of landlord/tenant rights and responsibilities; and addressing other issues that have, in the past, resulted in housing crisis or housing loss. Plans account for participant preferences/choices, and include only goals created with and agreed to by the participant.

C17. Program, at a minimum, maintains a list of community resources (and their eligibility requirements) to which participants can be referred. Preferably, program has relationships with these agencies. The list is regularly updated, and includes other low-income housing assistance programs.

C18. Case managers make referrals to appropriate community and mainstream resources, including, but not limited to income supplements/benefits (TANF, Food Stamps/SNAP, etc.), non-cash supports (healthcare, food supports, etc.), legal assistance, credit counseling, and subsidized childcare. When making these referrals, it is the case manager's responsibility to follow-up on receipt of assistance. However a participant may choose not to follow up on or participate in any referred services or programs.

C19. As rapid re-housing assistance is short-term, case managers pay particular attention to participants' incomes moving forward. Though income is not a requirement at the beginning of a program, case managers help participants review their budgets, including income and spending, to make decisions about reducing expenses and increasing income. Options include benefit enrollment and increasing employment and earnings over time.

C20. Case managers work with participants to identify pathways for increasing earned income, including participating in mainstream and community employment support programs as well as using a program's own employer connections.

C21. If necessary, participants are assisted in identifying existing familial and personal connections that can help them maintain housing by providing supports such as child care, transportation, etc. Participants may choose not to engage in this process.

Close the Case

C22. When closing a case, case managers are responsible for ensuring that all appropriate referrals have been made and information on available community assistance has been shared with a participant.

C23. When a referral to on-going supports is made while a case is open or in the process of closing, case managers provide a “warm handoff” and follow up, to assure that assistance is satisfactory.

C24. When closing a case, case managers provide information to participants about how they can access assistance from the program again if needed and what kind of follow-up assistance may be available. In instances when a participant is at imminent risk of returning to homelessness, program has the capacity to either directly intervene or provide referral to another prevention resource.

### **Examples of Meeting Program Standards: Rapid Re-Housing Case Management and Services**

Programs that meet the above standards include those that:

- Have job descriptions for case managers that include requirements that they focus activities on obtaining housing and housing stabilization and conduct case management in participants’ homes and other locations outside the office and that they have the ability to get to and from those meetings.
- Have case/housing plan templates that limit the number of goals and action steps to be included in a single plan, and focus attention on housing and income related goals.
- Have a case review process to help staff problem-solve around case/housing plans.
- Make use of a “Support Network Map” that helps participants identify people already in their lives who can help with specific things, such as transportation or child care.
- Offer budgeting assistance when desired by participants.
- Train staff to coach participants in conflict avoidance or de-escalation, adequate care of the housing unit, lease compliance, etc.
- Collect, maintain, and update records of available mainstream and community resources for program participants. This includes community resources that can reduce burdens on income including employment opportunities, food banks, clothing consignment stores, low-income utility programs, and others.

## Program Philosophy and Design

Beyond ending homelessness for individual households, rapid re-housing plays a key role in ending homelessness overall. To do so effectively and efficiently, a program must coordinate with the broader homeless system, not screen out large portions of the homeless population, and have a commitment to a Housing First approach.

### Principles

- In order to identify, engage, and assist as many households experiencing homelessness as possible, a program should coordinate and fully participate with the broader homeless assistance system.
- Rapid re-housing is an intervention designed for and flexible enough to serve anyone not able to exit homelessness on their own.<sup>2</sup> Rapid re-housing programs should not attempt to screen out households based on a score on an assessment tool or criteria that are assumed, but not shown, to predict successful outcomes, such as a minimum income threshold, employment, absence of a criminal history, evidence of “motivation,” etc.
- Rapid re-housing participants should have all the rights and responsibilities of typical tenants and should sign a standard lease agreement.

### Rationale

Rapid re-housing is a Housing First intervention meaning that the primary focus is moving households into housing quickly without preconditions. As such, programs should maximize the number of households they can serve by coordinating with the local homeless assistance system’s coordinated entry and outreach efforts and by not screening out households. Additionally, the primary focus of assessments and assistance should be on resolving the current housing crisis. This means a focus on the circumstances of the crisis, the household’s barriers to obtaining and maintaining housing, and the reasons they are unable to solve their housing crisis without the program’s help.

National data shows that rapid re-housing allows a very high percentage of homeless households with the highest barriers to secure permanent housing and not re-enter homelessness. Studies have not found any factors that reliably predict RRH program participants’ success or failure in maintaining permanent housing after the subsidy has ended. Therefore, assessing for *assumed* client success in maintaining permanent housing should not be a part of pre-intake screening or admission to a RRH program.

Despite its widespread effectiveness not all individuals or families will be successful in a shorter-term intervention like RRH. With that in mind, programs should have strong connections to mainstream housing programs and other service providers that can support households for whom the RRH intervention is not enough. Everything possible should be done to ensure that those served by rapid re-housing do not become homeless again.

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<sup>2</sup> Some households experiencing chronic homelessness would be more appropriately served in permanent supportive housing.

## Program Philosophy and Design Standards (P1. – P11.)

### *Program Staff*

P1. Program staff are trained on the principles of Housing First and oriented to the basic program philosophy of rapid re-housing. Program has routine way of onboarding new staff that includes training on Housing First and rapid re-housing principles.

P2. Program uses the standards included in this document (or other similar standards) as the basis for training and supervising staff.

### *Program Policies*

P3. Program has well-defined and written screening processes that use consistent and transparent decision criteria. Criteria do not include screening possible participants out for income or lack thereof.

P4. Eligibility criteria for the program do not include a period of sobriety, a commitment to participation in treatment, or any other criteria designed to “predict” long-term housing stability other than willingness to engage the program and work on a self-directed housing plan (see [Rapid Re-Housing Case Management Program Standards C16.](#)).

P5. If coordinated entry does not prioritize referrals, program has clearly-defined and written criteria and procedures that enable it to prioritize applicants, particularly where the volume of requests for assistance from eligible households exceeds program resources. Prioritized households are those least likely to exit homelessness without assistance—not the households considered most likely to succeed in rapid re-housing, regardless of any scores on assessment tools or lack of income.

P6. Disabilities are only assessed insofar as they may be a direct factor causing past housing instability or loss and when related to the participant’s ability to obtain a disability-specific benefit, service, or accessible unit.

P7. Leases for program participants are legally binding, written leases. Leases with additional requirements, such as drug testing or program participation, are not allowed.

### *Program Activities*

P8. Program participates in the local community’s Homeless Management Information System (HMIS) meaning they collect all required data standards and take steps to ensure quality data entry.

P9. Program participates in and accepts referrals from the local coordinated entry system and participates in efforts to improve the efficiency and quality of referrals when necessary. If there is no local Continuum of Care (CoC) organizing body (example: a statewide or Balance of State CoC) or coordinated entry system, a program has clearly defined outreach activities to engage possible program participants.

P10. The rapid re-housing program must maintain and distribute information on alternative, available resources that may intervene effectively and rapidly if the program’s services are unavailable or less effective.

P11. Program has an ongoing performance improvement process that includes evaluation of participant outcomes and participant feedback. The performance benchmarks and standards in this document provide a framework for performance evaluation and performance improvement efforts.

#### **Examples of Meeting Program Standards: Program Philosophy and Design**

Programs that meeting the above standards include those that:

- Have eligibility criteria that prioritize rather than exclude people who have no employment or income, or who are disabled.
- Participate in a planning or performance improvement process for local coordinated entry system to ensure sufficient and proper referrals.
- Ensure that participants are not presented with and do not sign leases that have restrictions that a typical tenant would not receive.



# Appendix G

## LCCEH Annual Performance Measures (Reporting Period 10/1 - 9/30)

ES, TH	Reduce <u>Average</u> Length of Stay from previous year
ES, TH	Reduce <u>Median</u> Length of Stay from previous year
ES, TH, PH-RRH	Permanent housing goal plan set for all clients and referrals to re-housing services within 7 days of arrival to shelter.
ES, TH, PH-RRH, SO	80% of all exits to are to permanent destinations*
ES, TH, PH-RRH, SO	5% or less of all adult & children exits destinations are to “other”, “client doesn’t know”, “client refused”; 0% “data not collected”
TH, PH-RRH, PH-PSH	20% of adults exiting your program will have increased employment income from entry to exit
TH, PH-RRH, PH-PSH	20% of adults exiting your program will have increased non-employment cash income from entry to exit
ES, TH, SO	80% of all <u>adults &amp; children</u> who exit to permanent housing destinations ( <u>during the previous reporting period</u> ) do not return to homelessness in <u>6</u> months
ES, TH, SO	80% of all <u>adults &amp; children</u> who exit to permanent housing destinations ( <u>during the previous reporting period</u> ) do not return to homelessness in <u>12</u> months
ES, TH, SO	80% of all <u>adults &amp; children</u> people who exit to permanent housing ( <u>during the previous reporting period</u> ) do not return to homelessness within <u>24</u> months
ES, TH, PH-RRH, PH-PSH, SO	HMIS Data Quality & Timeliness. Data is complete and accurate by the end of business day every Friday
ES, TH, PH-RRH, PH-PSH, SO	Homeless Verification document will be updated, within 2 weeks, prior to program entry
ES, TH	Reduction in the total number of persons served from previous reporting period

### Permanent Destinations\*

Moved from one HOPWA funded project to HOPWA PH  
 Owned by client, no ongoing subsidy  
 Owned by client, with ongoing subsidy  
 Rental by client, no ongoing subsidy  
 Rental by client, with VASH subsidy

Rental by client, with GPD TIP subsidy  
 Rental by client, other ongoing subsidy  
 PH for formerly homeless persons  
 Staying or living with family, permanent tenure  
 Staying or living with friends, permanent tenure

### The following Destinations are NOT considered by HUD to be Permanent Destinations

#### Temporary Destinations

ES, including hotel or motel paid for with ES voucher  
 Moved from one HOPWA funded project to HOPWA TH  
 Transitional housing for homeless persons  
 Staying or living with family, temporary tenure  
 Staying or living with friends, temporary tenure  
 Place not meant for human habitation  
 Hotel or motel, paid by client

Substance abuse treatment facility or detox center  
 Hospital or other residential non-psychiatric medical facility  
 Jail, prison, or juvenile detention facility  
 Long-term care facility or nursing home

#### Other Destinations

Residential project or halfway house with no homeless criteria  
 Deceased  
 Other  
 Client Doesn't Know/Client Refused

#### Institutional Setting

Foster care home or group foster care home  
 Psychiatric hospital or other psychiatric facility



## The Lancaster County Coalition to End Homelessness

*Vision: We will effectively end homelessness in Lancaster County.*

*Mission: The Lancaster County Coalition to End Homelessness leads community efforts to rapidly and sustainably house all people experiencing homelessness.*

There has been some confusion about how Homeless Verification Forms are filled out, by whom and when. Hopefully, this letter will provide some clarity about who is responsible for them and when they need to be obtained.

HUD requires that all of the clients who are enrolled in programs that are paid for by HUD funds fit the HUD definition of homelessness. That definition states that a person must be literally homeless, living in a shelter, fleeing domestic violence or exiting an institution (hospital, prison, etc) after being there less than 90 days and otherwise meeting the definition before entering that institution. HUD also requires that clients go through some sort of verification process, to ensure that they are homeless when seeking services.

Studies have shown that many people will self-resolve in 10-14 days, which is why we have determined that after 14 days, an updated Homeless Verification Form should be obtained (see examples below).

The Homeless Verification Form is required for every client that is enrolled in a program paid for by HUD (except ES). Historically, CHART fills these forms out when the clients meet the HUD definition. However, CHART also assesses people who do NOT meet the HUD definition (say, seeking shelter that day) and would therefore NOT be able to fill out the Homeless Verification Form for that client.

Here are a few examples of how the system should flow:

- a. An example: CHART sends you a referral for client Jane Doe, but your program is full and is not taking on new clients. 4 weeks after the referral comes in a spot opens up, you will need to verify the client is still homeless before enrolling them in your program. That would require getting a signed form from an emergency shelter (if that is where the client is staying) or an outreach worker (if the client is unsheltered). If the client has moved in with a family member or friend, they are no longer homeless per HUD's definition and would not be eligible for services.
- b. 2<sup>nd</sup> example: CHART sends you a referral and you have an immediate opening. Check the client's file and verify whether the CHART worker was able to fill out the homeless verification form. If the form has been uploaded into the client file, and you verify with the client at intake their prior residence meets HUD's definition (part of the "HUD Universal Assessment in CaseWorthy) you should be good to go. If there is no form and they are at a shelter, the shelter staff will need to fill out the form.

While CHART has historically filled out that initial Verification Form, we are requiring that all programs obtain an updated form (if it is older than 14 days) when enrolling a client in a HUD-funded program. This will mean reaching out to the Emergency Shelters' staff or outreach workers and asking for a completed Homeless Verification Form to be completed and sent to you.

If you have further questions, you can contact Jason Harnish (jharnish2@lghealth.org) at LCCEH. The HUD requirements can also be found in our Performance Standards and Policies document, under the Recordkeeping requirements in Appendix B.

Thank you,

Jen Koppel