

2018

City of Lancaster, Pennsylvania

Consolidated
Annual
Performance and
Evaluation
Report

Prepared for the U.S. Department of Housing and Urban Development (HUD)



Department of Economic Development and Neighborhood Revitalization

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Danene Sorace, Mayor

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The City has continued to focus on addressing the following primary objectives:

1. Provide decent, affordable rental and owner-occupied housing for low- and very low-income families and individuals.
2. Upgrade public infrastructure and facilities in areas of the City principally occupied by persons with low- and very low-income families and individuals.
3. Provide human services for low- and very low-income families and individuals.
4. Improve accessibility for persons with disabilities.
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.

Accomplishments for these goals are stated in the table below.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Assist Homeless Persons	Homeless	ESG: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	1300	725	55.77%	250	102	40.80%

Assist Homeless Persons	Homeless	ESG: \$	Homeless Person Overnight Shelter	Persons Assisted	2000	825	41.25%	200	52	26.00%
Create Suitable Living Environment	Affordable Housing Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	33567	34760	103.55%	33567	34760	103.55%
Create Suitable Living Environment	Affordable Housing Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	33567	34760	103.55%	33567	34760	103.55%
Create Suitable Living Environment	Affordable Housing Non-Housing Community Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	750	64	8.53%			
Economic Development	Non-Housing Community Development	CDBG: \$	Jobs created/retained	Jobs	25	20	80.00%	5	9	180.00%
Housing	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	82	144	175.61%	35	51	145.71%
Housing	Affordable Housing	CDBG: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	2500	11418	456.72%	2500	4545	181.80%
Removal of Blight	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	75	64	85.33%	25	20	80.00%

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

Please see the below Project outlines for details on how the jurisdiction's use of funds addresses the priorities and specific objectives identified in the plan.

The Vacant and Blighted Property Acquisition and Disposition Activity

The Vacant and Blighted Property Acquisition and Disposition Activity continued the citywide acquisition of vacant and/or blighted residential and commercial properties. This activity has been used as a last resort strategy after all other code enforcement efforts have been deemed unsuccessful. This opportunity increased the availability of quality affordable housing and economic opportunities for Lancaster individuals and families. It also provided a service to the surrounding homes, increasing property value and stability. \$100,000 2018 CDBG dollars were committed to and helped fund this program. A total of twelve (12) properties were declared blighted by the Redevelopment Authority of the City of Lancaster during 2018 and were condemned and seized through eminent domain. During the report period, sixteen (16) residential properties were rehabilitated, a total of twenty (20) housing units.

The Neighborhood Crime Reduction Activity

The Neighborhood Crime Reduction Activity operates a street operations group primarily in lower-income areas of the City. The program funds permitted extra patrols of the group on an overtime basis. The objective of the unit was to reduce crime and improve the quality-of-life for residents in City neighborhoods. \$120,000 2018 CDBG dollars were committed to help fund the program, increasing the quality of life in low-income areas of the city. For the year of 2018, the Lancaster Bureau of Police conducted one hundred and ninety-two SOG details. Below is a list of the yearly stats:- 183 new drug dealers were identified and charged with drug-related offenses- 23 new drug trafficking residences were located- 803 felony drug charges were filed - 121 misdemeanor drug charges were filed- 467 summary citations were filed- 96 arrest warrants were served- 113 criminal charges were filed- Illegal drugs seized worth a street value of \$102,280 - \$30,485 seized as drug proceeds- 7 firearms seized - 15 parking tickets issued SOG had a very successful year addressing many different types of crimes and was instrumental in providing excellent service to the citizens of Lancaster City. Without SOG, many crimes would go unnoticed and

unchecked, while numerous criminals, specifically drug dealers would be free to operate within Lancaster City without fear of consequences. SOG is vital to the operations of the Lancaster Bureau of Police and is a necessary resource used by the Bureau. SOG looks forward to future success in combating crime in Lancaster City.

The Micro-Enterprise Development/Business Service Center Activity

The Micro-Enterprise Development/Business Service Center Activity offers small business training, mentoring, loans and other technical assistance to lower-income men and women who wish to establish or expand micro-enterprise businesses. Participants attend a 52-hour training course. Participants are matched with a business or professional mentor for six months. Applicants successfully completing the ASSETS Program are eligible to apply for a micro-enterprise loan through the City's State-funded Enterprise Zone Loan Fund. All attendees receive continuous technical assistance and support after graduation. \$5,000 2017 CDBG dollars were committed to help fund the program, improving the economic development services for low- and very-low income persons. Fourteen (14) city residents went through the business training course and nine (9) jobs were subsequently created and retained for city residents.

The Housing Code Enforcement Program

The Housing Code Enforcement Program is designed to improve the health and safety conditions in all homes (especially those occupied by lower-income city residents), prevent deterioration of the City's housing stock, and stop the spread of blight, particularly in areas principally occupied by low-income persons. \$525,000 2018 CDBG dollars were committed to this program and helped leverage City general fund dollars, allowing this program to continue to operate pro-actively to housing and health issues. This service increased the quality of affordable housing for 4,454 city homes (with a focus on homes in low and very-low income census tracts). There was an increase in CDBG dollars put toward this program (from 2017 - 2018). This increase in dollars correlated with an increase in units that saw proactive code enforcement.

The Critical Repair and Lead Hazard Reduction Activity

The Critical Repair and Lead Hazard Reduction Activities provides assistance to reduce or eliminate lead hazards in housing for qualified applicants. Eligible applicants receive financial assistance to reduce lead hazards found in the home through a Risk Assessment. Repairs include replacement or repair of items such as doors, windows, and floors. The work to be performed is determined by the results of the Risk Assessment. Licensed and certified contractors will use interim controls and abatement methods when performing the work. The program does not make the property lead-free, instead the property will be considered lead-safe. A lien will be placed on the property to ensure the property

remains lead-safe, and will be removed after five (5) years. If hazard(s) are found within 5 years, the owner must agree to remediate the hazard(s) found and they must try to rent the unit to a family that has a child under the age of six. \$455,000 2018 CDBG dollars were committed to and helped fund this program. A total of 51 household units were assisted through this program. These services increase the affordability of homeownership to its recipients. It potentially prevented homeownership loss due to lack of affordability. It also provided a service to the surrounding homes, increasing property value and stability.

The Fair Housing Services Activity

The Fair Housing Services Activity increased accessibility fair and equal housing and affordable housing opportunities in Lancaster City regardless of an individual's race, color, religion, age, sex, ancestry, national origin, disability, or familial status in accordance with County, State and Federal Fair Housing and Landlord Tenant laws. This was accomplished through education, outreach, training and technical assistance. \$20,000 2018 CDBG dollars were committed to and helped fund this program (an increase from last year). In 2018, these dollars went toward the following activities:- 10 Fair Housing workshops to 139 individuals from Lancaster county's Landlords, social service agencies. These workshops included the following topics: landlord forum, service animals, tenant forum, comm. legal clinic, limited English proficiency, FHA/LLT forum, MH crisis/FHA, implied warranty, landlord snack & chat, fair housing basics. - Fair Housing at 50 summit with over 100 attendees from municipal governments, service providers, landlords, real estate sales and rental professionals. The event held three panels and two key note speakers. - In the calendar Year 2018, this activity provided a total of 477 Landlord/FHA technical assistance- The HEEL at LHOP formed a partnership with the PA Housing Equality Center, a Fair Housing Initiatives Program (FHIP) enforcement agency. The partnership allowed HEEL to gain the rights to a new design and layout of the Landlord Tenant Rights & Responsibilities manual in exchange for sharing most of its content with PA Housing Equality Center. The result of this partnership was the NEW Know Your Rights Landlord & Tenant Guide. A first run printing of 2500 were received in July 2018 and as of February 2019 an additional 1000 have been printed. The new guide has been translated to Spanish and made available online on our website. Funding has been requested in partnership with PA Human Relations Commission to print the additional 7 languages and 2 new languages of Swahili and French Creole.

The Street Improvements Activity

The Street Improvements Activity improved selected segments of streets in targeted areas of low- and very-low income neighborhoods (see Attachment 1 Income Map for more information). Improvements covered 23 city blocks and included the installation of twenty-seven (27) ADA ramps, increasing accessibility for persons with disabilities. \$270,000 2018 CDBG dollars were committed to and helped fund the Streets Improvements Program. Five (5) streets (a total of 23 city blocks) were paved during 2018. This service improved the quality of the living

environment and increased the number of public improvements for the 33,760 low- and very-low income individuals throughout the city who live and commute on these streets.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG	ESG
White	119	75
Black or African American	64	64
Asian	4	0
American Indian or American Native	4	0
Native Hawaiian or Other Pacific Islander	0	0
Total	191	139
Hispanic	58	64
Not Hispanic	124	87

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

These statistics only include data from CDBG activities that provided a direct benefit to specific households. These activities include:

1. The Homeowner Rehabilitation and Critical Repair Loan Activities
2. The Fair Housing Services Activity
3. The Micro-Enterprise Development/Business Service Center Activity

Please see *CR-05 - Goals and Outcomes* for more information on the impact of the indirect services provided to city residents. Additionally, please see the below table entitled *Demographics of Lancaster* for more information.

Please note, the difference in numbers between the race and ethnicity of those assisted by CDBG funded programs is due to 22 participants identifying as "other/multi-racial."

The difference in numbers between the race and ethnicity of those assisted by CDBG funded programs is due to 22 participants identifying as "other/multi-racial." The total number served directly through through

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	1,704,361	443,435
ESG	public - federal	139,155	55,199

Table 3 - Resources Made Available

Narrative

ESG funds were subcontracted to sub-recipients for the period of July 1, 2019 – June 30, 2020. The above ESG expenditures are for half of the contract period. The remaining funds will be expended during 2020.

As our HUD funding was allocated late in the program year, The City limited time in the program year to spend available resources.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
LANCASTER CITY	100	100	All funds were spent in the city of Lancaster, with a focus on the low- and moderate-income areas.

Table 4 – Identify the geographic distribution and location of investments

Narrative

All funds were spent in the city of Lancaster, with a focus on the low- and moderate-income areas.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

Federal funds have continued to leverage private, state and local funds. CDBG funds supplemented a variety of programs that have other sources of funding. The Streets Improvements program used 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 represented less than 5% of their total program budget (the majority of their budget is comprised of privately raised funds). The Fair Housing Program also received private funds, in addition to state and local funds.

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

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	250	102
Number of Non-Homeless households to be provided affordable housing units	60	182
Number of Special-Needs households to be provided affordable housing units	0	0
Total	310	284

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	250	102
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	35	51
Number of households supported through Acquisition of Existing Units	25	20
Total	310	173

Table 6 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

The number of households supported through acquisition of existing units is representative of the properties acquired through the CDBG funded activity - Vacant and Blighted Property Acquisition and Disposition (described in detail in section CR – 05). This activity is a last resort after all other code enforcement measures have been deemed ineffective. We have estimated that 25 properties a year will require this activity's attention; however, it is just an average and some years the need is less than 25

properties. This activity performing at 80% of its expected goal is a reflection of a decreased need not a reflection of an ineffective program.

The number of homeless households to be provided affordable housing units and the number of households supported through rental assistance both reflect the same ESG funded programs: the CAP Rapid Re-Housing Project (described in detail in section CR - 05). In 2018, CAP RRH met 40% of our intended goal. This low number is in part due to the changes undergone by CAP in the past year, moving away from a rapid rehousing service for strictly domestic violence survivors and toward a more comprehensive funding strategy. This has resulted in new staff being brought in. We hope that next year will show a greater number of clients served.

Along with the above changes 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.
- A Rapid Rehousing Process Analysis and Review Committee met several times in 2018 to review, analyze, and recommend changes to the referral/connection process for our rapid rehousing services. Key City staff will sit on the committee and participate in the committee's review process. This summit resulted in a higher threshold for rapid rehousing clients.

The low number may also partially be 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.

Discuss how these outcomes will impact future annual action plans.

The City will continue to support Rapid Rehousing, Homeowner Rehabilitation and Acquisition programs as these programs are effective in making affordable housing accessible and sustainable for low- and moderate-income households.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	43	0
Low-income	112	0
Moderate-income	45	0
Total	200	0

Table 7 – Number of Households Served

Narrative Information

The above numbers on income only include data from CDBG activities that provided a direct, affordable housing benefit to specific households. These activities include:

1. The Homeowner Rehabilitation and Critical Repair Loan Activities
2. The Lancaster Housing Opportunity Partnership's Fair Housing Program

Please see CR-05 - Goals and Outcomes for more information on the impact of all services provided to city residents. Additionally, please see Attachment 2 entitled *Household Income in the Past 12 Months (2016 inflation Adjusted Dollars)* for more information on the city as a whole.

The number of HOME persons served is located in the Lancaster County portion of the CAPER as the County is the lead entity for the HOME consortium.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

Homeless outreach workers provided street-based and shelter-based outreach to persons experiencing homelessness. These workers built relationships with persons experiencing homelessness and connected them with services. Outreach workers also built 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 were built, outreach workers connected 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 were mobile, allowing them to conduct face-to-face initial assessments to clients who were at emergency shelters, the daytime drop-in center, on the street or in other areas. Outreach Workers were trained to conduct CHART assessments. This decreased the number of contacts a client needed to be connected with services.

CHART does the following:

- Ensure that households at imminent risk of homelessness get the right services at the right time and at the right level;
- Provide 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) continued 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 2017 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 will review 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.

CHART assessments are also conducted before any individual or family can enter emergency shelter or transitional housing, with the exception of those fleeing domestic violence.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Rapid re-housing services was the primary method to make the transition to permanent housing and independent living for persons experiencing homelessness. Rapid re-housing helped 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 worked to prevent formerly homeless persons from returning to homelessness. Self sufficiency was also a primary goal of the program.

The Lancaster County Continuum of Care met with publicly funded institutions to ensure proper discharge planning. The Lancaster County Re-Entry Management Organization (RMO) focused specifically on citizens returning from corrections institutions and programs. Hospitals, county behavioral health, RMO, housing and other various social service providers were 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 also participated at all levels of the Continuum of Care.

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

The CoC worked 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 offered education and supportive services for ages 16-21. Staff members facilitated 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 mentored youth for ongoing support as they accessed 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 located 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 assisted youth in paying for housing until they built savings and maintained a budget. Collaborative stakeholders included Administration of PA Courts, CYA, Guardians Ad Litem, and OCYF, Boys Club and local housing providers.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

LCHA is also continuing to look for ways to make more units accessible. LCHA allows area agencies to make accessibility improvements to specific units for their clients.

LCHA also continues to purge its waiting list once per year, which opens once every three to four years. LCHA is maximizing Voucher utilization, maintaining a Public Housing vacancy rate of less than 3%, and providing Voucher mobility counseling. LCHA has achieved a “high performer” designation in the Section Eight Management Assessment Program (SEMAP).

Actions taken to encourage public housing residents to become more involved in management and participate in homeownership

LCHA holds residential advisory board meetings.

Actions taken to provide assistance to troubled PHAs

n/a

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken 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. 91.220 (j); 91.320 (i)

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.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

The City’s Critical Repair Program, Homeowner Rehab Program, Lead Hazard Control Program and Healthy Homes Program all focused 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 continued during the 2018 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
- 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.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

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 was 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 will allow 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. During 2017, the City provided reduced lead hazards in 50 properties using LBPHC funds (from HUD and Lawrence County).

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

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 & Community (please find it attached).

The City has also continued its work to address housing issues for low and moderate income families by providing emergency home repair and homeowner rehabilitation programs.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

The Department of Economic Development and Neighborhood Revitalization (EDNR) assisted with many efforts to overcome gaps in the institutional structure of the service delivery system in the City. However, 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 2017, EDNR representatives belonged to a variety of committees and boards. This involvement helped 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 taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

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.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

In 2018, the City of Lancaster continued 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 27 ADA curb cuts during 2018 calendar year with CDBG funds (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. We have completed our Language Access Plan (see attachment) and have hired a Language Access Coordinator. 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 also works 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 CAPER for a comprehensive understanding of how the Lancaster community is addressing the identified *Impediments to Fair Housing* (2013). Please see the attachments below for details on how, in 2018, The Fair Housing Program was tasked with addressing the following impediments in the following ways:

Impediment A – LHOP Fair Housing Program

With an increasing number of people in the County, there is more demand for an ongoing educational program for fair housing requirements. This impediment will be address by conducting the following: 10 Fair Housing workshops to 139 individuals from Lancaster county's Landlords, social service agencies, 1 Civil Rights in Housing Event and technical assistance to 477 Landlords (individuals may be duplicated). Additionally, The HEEI at LHOP formed a partnership with the PA Housing Equality Center, a Fair Housing Initiatives Program (FHIP) enforcement agency. The partnership allowed HEEI to gain the rights to a new design and layout of the Landlord Tenant Rights & Responsibilities manual in exchange for sharing most of its content with PA Housing Equality Center. The result of this partnership was the NEW Know Your Rights Landlord & Tenant Guide. A first run printing of 2500 were received in July 2018 and as of February 2019 an additional 1000 have been printed. The new guide has been translated to Spanish and made available online on our website. Funding has been requested in partnership with PA Human Relations Commission to print the additional 7 languages and 2 new languages of Swahili and French Creole.

Impediment D – LHOP Fair Housing Program

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): HEEI operates as Local Lead Agency for the Section 811 Project Rental Assistance. As such HEEI Housing Programs Specialist Brittany Mellinger, leads the effort of providing support to the Self Determination Housing

Program and the services providers in obtaining accessible units through the 811 program. Additionally, visits, workshops, and conferences held by HEEI provide avenues to inform and educate municipal officials, developers, and real estate professionals on the need for accessible housing and the benefit of their value long-term. The HEEI is also an active partner in the Berks-Lancaster-Lebanon LINK Network, working to foster, learn, and communicate about community resources for people with disabilities. Work with local disability organizations to explore creation of housing opportunities that will increase housing choice for this community. HEEI is currently working with Disability Empowerment Center, United Disabilities Services, Vision Works, ARC of Lancaster, and BHDS on the coordination and execution of the Disability in Housing workshops. The mission of the workshops is to gather community members, local government officials, landlords/leasing agents, and real estate professionals to talk about how community developers can work together with these agencies in promoting a more inclusive community and minimize the segregation of PWD.

Impediment E – LHOP Fair Housing Program

Home financing data indicates a disparity between denial rates among racial and ethnic groups: 106 Fair Lending training has been provided to 300 participants year to date 106 participants have been approved for First-time home buyer closing cost and down payment assistance. A Fair Lending Symposium planning committee has been assembled to develop and execute a Fair Lending Symposium for 2019

Impediment I – LHOP Fair Housing Program

People with limited English proficiency may have barriers to fair housing: The HEEI at LHOP has implemented a language line service for individuals with Limited English Proficiency (LEP). In addition, we have implemented a ASL interpreter service available to individuals in Lancaster county's Deaf and Hard of Hearing Community. These services are offered through Propio Language Services. Lastly, our Landlord Tenant guides are translated into 8 different languages and Braille to serve a variety of languages most common to our Lancaster county population. HEEI continues to work with Church World Service, and Millersville University's PA Migrant Education addressing issues of LEP. An LEP workshop was held in October of 2018 where attendees that included landlords and service providers received and shared information regarding Fair Housing and Equal Access.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Proper agency monitoring involves on-site visits and regular in-house reviews of monthly performance reports and reimbursement requests. Additionally, the City, in collaboration with the Lancaster County Coalition to End Homelessness (LCCEH), reviews outcomes for ESG-funded programs and data-standard monitoring. These outcomes and data standards have been adopted by the local CoC and are based on best-practices and HUD requirements and/or recommendations.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The City of Lancaster remains committed to providing clear and easily accessible methods for residents, businesses, institutions, organizations, etc. to provide input on key city projects, plans and reports.

A legal advertisement was placed in the local newspaper on Monday, March 5, 2018, announcing a 15-day public comment period and public meeting scheduled for Thursday, March 21, 2018. This information was also posted in the Lancaster's most prominent local paper and on the City's website, along with a copy of the draft report.

Additionally, other strategies to reach citizens include consistent City representation at community groups. These community groups include:

- Spanish American Civic Association (SACA)
- Southwest Neighborhood's Effort (SOWE)
- Neighbors United

For more information, please see the Attachment 4 - Citizen Participation Summary.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

N/A

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-60 - ESG 91.520(g) (ESG Recipients only)

ESG Supplement to the CAPER in *e-snaps*

For Paperwork Reduction Act

1. Recipient Information—All Recipients Complete

Basic Grant Information

Recipient Name	LANCASTER
Organizational DUNS Number	010569457
EIN/TIN Number	236001904
Identify the Field Office	PHILADELPHIA
Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance	Philadelphia CoC

ESG Contact Name

Prefix	Mr
First Name	Randy
Middle Name	0
Last Name	Patterson
Suffix	0
Title	Director, Economic Development and Neighborhood Revitalization

CAPER

23

ESG Contact Address

Street Address 1	120 North Duke Street
Street Address 2	PO Box 1599
City	Lancaster
State	PA
ZIP Code	-
Phone Number	7172914760
Extension	0
Fax Number	0
Email Address	rpatterson@cityoflancasterpa.com

ESG Secondary Contact

Prefix	Ms
First Name	Megan
Last Name	Blackmon
Suffix	0
Title	Grants Administrator
Phone Number	1712914740
Extension	0
Email Address	mblackmon@cityoflancasterpa.com

2. Reporting Period—All Recipients Complete

Program Year Start Date	01/01/2018
Program Year End Date	12/31/2018

3a. Subrecipient Form – Complete one form for each subrecipient

Subrecipient or Contractor Name: Community Action Program
City: Lancaster
State: PA
Zip Code: 17603, 5621
DUNS Number: 072833023
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 66970

Subrecipient or Contractor Name: YWCA Lancaster

City: Lancaster

State: PA

Zip Code: 17602, 2923

DUNS Number: 075318626

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 61750

CR-65 - Persons Assisted

4. Persons Served

4a. Complete for Homelessness Prevention Activities

Number of Persons in Households	Total
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 16 – Household Information for Homeless Prevention Activities

4b. Complete for Rapid Re-Housing Activities

Number of Persons in Households	Total
Adults	43
Children	59
Don't Know/Refused/Other	0
Missing Information	0
Total	102

Table 17 – Household Information for Rapid Re-Housing Activities

4c. Complete for Shelter

Number of Persons in Households	Total
Adults	20
Children	32
Don't Know/Refused/Other	0
Missing Information	0
Total	52

Table 18 – Shelter Information

4d. Street Outreach

Number of Persons in Households	Total
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 19 – Household Information for Street Outreach

4e. Totals for all Persons Served with ESG

Number of Persons in Households	Total
Adults	63
Children	91
Don't Know/Refused/Other	0
Missing Information	0
Total	154

Table 20 – Household Information for Persons Served with ESG

5. Gender—Complete for All Activities

	Total
Male	56
Female	98
Transgender	0
Don't Know/Refused/Other	0
Missing Information	0
Total	154

Table 21 – Gender Information

6. Age—Complete for All Activities

	Total
Under 18	91
18-24	9
25 and over	54
Don't Know/Refused/Other	0
Missing Information	0
Total	154

Table 22 – Age Information

7. Special Populations Served—Complete for All Activities

Number of Persons in Households				
Subpopulation	Total	Total Persons Served – Prevention	Total Persons Served – RRH	Total Persons Served in Emergency Shelters
Veterans	0	0	0	0
Victims of Domestic Violence	55	0	43	14
Elderly	0	0	0	0
HIV/AIDS	0	0	0	0
Chronically Homeless	4	0	0	4
Persons with Disabilities:				
Severely Mentally Ill	20	0	6	14
Chronic Substance Abuse	1	0	1	0
Other Disability	26	0	11	10
Total (Unduplicated if possible)	154	0	102	52

Table 23 – Special Population Served

CR-70 – ESG 91.520(g) - Assistance Provided and Outcomes

10. Shelter Utilization

Number of New Units - Rehabbed	0
Number of New Units - Conversion	0
Total Number of bed-nights available	3,572
Total Number of bed-nights provided	3,509
Capacity Utilization	98.24%

Table 24 – Shelter Capacity

11. Project Outcomes Data measured under the performance standards developed in consultation with the CoC(s)

ESG funds were subcontracted to sub-recipients for the period of July 1, 2019 – June 30, 2020. The above ESG expenditures are for half of the contract period. The remaining funds will be expended during 2020.

As our HUD funding was allocated late in the program year, The City limited time in the program year to spend available resources.

CR-75 – Expenditures

11. Expenditures

11a. ESG Expenditures for Homelessness Prevention

	Dollar Amount of Expenditures in Program Year		
	2016	2017	2018
Expenditures for Rental Assistance	0	0	0
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	0	0	0
Expenditures for Housing Relocation & Stabilization Services - Services	0	0	0
Expenditures for Homeless Prevention under Emergency Shelter Grants Program	0	0	0
Subtotal Homelessness Prevention	0	0	0

Table 25 – ESG Expenditures for Homelessness Prevention

11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year		
	2016	2017	2018
Expenditures for Rental Assistance	0	0	0
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	0	1,752	0
Expenditures for Housing Relocation & Stabilization Services - Services	0	28,394	6,292
Expenditures for Homeless Assistance under Emergency Shelter Grants Program	0	0	0
Subtotal Rapid Re-Housing	0	30,146	6,292

Table 26 – ESG Expenditures for Rapid Re-Housing

11c. ESG Expenditures for Emergency Shelter

	Dollar Amount of Expenditures in Program Year		
	2016	2017	2018
Essential Services	0	0	0
Operations	0	3,397	42,943
Renovation	0	0	0

Major Rehab	0	0	0
Conversion	0	0	0
Subtotal	0	3,397	42,943

Table 27 – ESG Expenditures for Emergency Shelter

11d. Other Grant Expenditures

	Dollar Amount of Expenditures in Program Year		
	2016	2017	2018
Street Outreach	0	0	0
HMIS	0	0	0
Administration	0	10,600	5,962

Table 28 - Other Grant Expenditures

11e. Total ESG Grant Funds

Total ESG Funds Expended	2016	2017	2018
	0	44,143	55,197

Table 29 - Total ESG Funds Expended

11f. Match Source

	2016	2017	2018
Other Non-ESG HUD Funds	0	10,600	55,199
Other Federal Funds	0	0	0
State Government	0	33,543	0
Local Government	0	0	0

Private Funds	0	0	0
Other	0	0	0
Fees	0	0	0
Program Income	0	0	0
Total Match Amount	0	44,143	55,199

Table 30 - Other Funds Expended on Eligible ESG Activities

11g. Total

Total Amount of Funds Expended on ESG Activities	2016	2017	2018
	0	88,286	110,396

Table 31 - Total Amount of Funds Expended on ESG Activities

Appendices

Appendix 1 – Financial Summaries

- HUD PR26 – CDBG Financial Summary Report for Program Year 2018
- HUD PR91 – ESG Financial Summary Report for Program Year 2018

Appendix 2 – ESG Performance Report

- The Lancaster County Coalition to End Homelessness Continuum of Care Performance Standards and Policies (2016)
- ESG Performance Report – Program Year 2018

Appendix 3 – Citizen Participation Summary

- Citizen Participation Plan
- Proof of Publication
- Public Meeting Attendance

Appendix 4 – Income of Lancaster

Appendix 5 – Language Access Plan (2019)



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PART I: SUMMARY OF CDBG RESOURCES

01 UNEXPENDED CDBG FUNDS AT END OF PREVIOUS PROGRAM YEAR	0.00
02 ENTITLEMENT GRANT	1,679,235.00
03 SURPLUS URBAN RENEWAL	0.00
04 SECTION 108 GUARANTEED LOAN FUNDS	0.00
05 CURRENT YEAR PROGRAM INCOME	25,125.82
05a CURRENT YEAR SECTION 108 PROGRAM INCOME (FOR SI TYPE)	0.00
06 FUNDS RETURNED TO THE LINE-OF-CREDIT	0.00
06a FUNDS RETURNED TO THE LOCAL CDBG ACCOUNT	0.00
07 ADJUSTMENT TO COMPUTE TOTAL AVAILABLE	0.00
08 TOTAL AVAILABLE (SUM, LINES 01-07)	1,704,360.82

PART II: SUMMARY OF CDBG EXPENDITURES

09 DISBURSEMENTS OTHER THAN SECTION 108 REPAYMENTS AND PLANNING/ADMINISTRATION	940,309.37
10 ADJUSTMENT TO COMPUTE TOTAL AMOUNT SUBJECT TO LOW/MOD BENEFIT	0.00
11 AMOUNT SUBJECT TO LOW/MOD BENEFIT (LINE 09 + LINE 10)	940,309.37
12 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	216,933.65
13 DISBURSED IN IDIS FOR SECTION 108 REPAYMENTS	0.00
14 ADJUSTMENT TO COMPUTE TOTAL EXPENDITURES	0.00
15 TOTAL EXPENDITURES (SUM, LINES 11-14)	1,157,243.02
16 UNEXPENDED BALANCE (LINE 08 - LINE 15)	547,117.80

PART III: LOWMOD BENEFIT THIS REPORTING PERIOD

17 EXPENDED FOR LOW/MOD HOUSING IN SPECIAL AREAS	0.00
18 EXPENDED FOR LOW/MOD MULTI-UNIT HOUSING	0.00
19 DISBURSED FOR OTHER LOW/MOD ACTIVITIES	838,952.14
20 ADJUSTMENT TO COMPUTE TOTAL LOW/MOD CREDIT	0.00
21 TOTAL LOW/MOD CREDIT (SUM, LINES 17-20)	838,952.14
22 PERCENT LOW/MOD CREDIT (LINE 21/LINE 11)	89.22%

LOW/MOD BENEFIT FOR MULTI-YEAR CERTIFICATIONS

23 PROGRAM YEARS(PY) COVERED IN CERTIFICATION	PY: PY: PY:
24 CUMULATIVE NET EXPENDITURES SUBJECT TO LOW/MOD BENEFIT CALCULATION	0.00
25 CUMULATIVE EXPENDITURES BENEFITING LOW/MOD PERSONS	0.00
26 PERCENT BENEFIT TO LOW/MOD PERSONS (LINE 25/LINE 24)	0.00%

PART IV: PUBLIC SERVICE (PS) CAP CALCULATIONS

27 DISBURSED IN IDIS FOR PUBLIC SERVICES	115,363.10
28 PS UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	0.00
29 PS UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	0.00
30 ADJUSTMENT TO COMPUTE TOTAL PS OBLIGATIONS	0.00
31 TOTAL PS OBLIGATIONS (LINE 27 + LINE 28 - LINE 29 + LINE 30)	115,363.10
32 ENTITLEMENT GRANT	1,679,235.00
33 PRIOR YEAR PROGRAM INCOME	52,987.38
34 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PS CAP	0.00
35 TOTAL SUBJECT TO PS CAP (SUM, LINES 32-34)	1,732,222.38
36 PERCENT FUNDS OBLIGATED FOR PS ACTIVITIES (LINE 31/LINE 35)	6.66%

PART V: PLANNING AND ADMINISTRATION (PA) CAP

37 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	216,933.65
38 PA UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	0.00
39 PA UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	0.00
40 ADJUSTMENT TO COMPUTE TOTAL PA OBLIGATIONS	0.00
41 TOTAL PA OBLIGATIONS (LINE 37 + LINE 38 - LINE 39 +LINE 40)	216,933.65
42 ENTITLEMENT GRANT	1,679,235.00
43 CURRENT YEAR PROGRAM INCOME	25,125.82
44 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PA CAP	0.00
45 TOTAL SUBJECT TO PA CAP (SUM, LINES 42-44)	1,704,360.82
46 PERCENT FUNDS OBLIGATED FOR PA ACTIVITIES (LINE 41/LINE 45)	12.73%



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LINE 17 DETAIL: ACTIVITIES TO CONSIDER IN DETERMINING THE AMOUNT TO ENTER ON LINE 17

Report returned no data.

LINE 18 DETAIL: ACTIVITIES TO CONSIDER IN DETERMINING THE AMOUNT TO ENTER ON LINE 18

Report returned no data.

LINE 19 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 19

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2017	2	1773	6168089	Streets Improvements	03K	LMA	\$163,290.96
2017	2	1773	6196155	Streets Improvements	03K	LMA	\$26,763.53
					03K	Matrix Code	\$190,054.49
2017	3	1770	6111833	Neighborhood Crime	05I	LMA	\$1,058.97
2018	3	1808	6203298	Neighborhood Crime Reduction	05I	LMA	\$84,848.01
2018	3	1808	6203299	Neighborhood Crime Reduction	05I	LMA	\$5,593.60
2018	3	1808	6207729	Neighborhood Crime Reduction	05I	LMA	\$6,335.88
2018	3	1808	6213441	Neighborhood Crime Reduction	05I	LMA	\$3,825.56
2018	3	1808	6215850	Neighborhood Crime Reduction	05I	LMA	\$7,898.17
2018	3	1808	6220505	Neighborhood Crime Reduction	05I	LMA	\$5,802.91
					05I	Matrix Code	\$115,363.10
2016	6	1768	6122851	328 W Grant Street	14A	LMH	\$505.00
2016	6	1783	6122851	551 S Prince Street	14A	LMH	\$530.62
2016	6	1791	6129242	816 W Vine Street	14A	LMH	\$566.20
2016	6	1791	6131980	816 W Vine Street	14A	LMH	\$2,187.80
2016	6	1794	6146070	709 N Plum Street	14A	LMH	\$6,966.00
2016	6	1794	6159243	709 N Plum Street	14A	LMH	\$774.00
2016	6	1800	6191207	454 Fremont Street	14A	LMH	\$4,450.00
2016	6	1803	6193012	669 Hebrank Street	14A	LMH	\$6,286.50
2016	6	1803	6201288	669 Hebrank Street	14A	LMH	\$420.00
2016	6	1803	6207729	669 Hebrank Street	14A	LMH	\$698.50
2016	6	1804	6201288	859 S Queen Street	14A	LMH	\$4,821.00
2016	6	1804	6205773	859 S Queen Street	14A	LMH	\$3,179.00
2016	6	1805	6205773	105 Howard Avenue	14A	LMH	\$6,305.00
2016	6	1806	6213441	411.5 Chester Street	14A	LMH	\$4,620.00
2016	6	1807	6215850	625 N Pine Street	14A	LMH	\$4,215.00
2016	6	1818	6220505	315 E Ross Street	14A	LMH	\$7,800.00
2016	6	1819	6207729	211 Coral Street	14A	LMH	\$4,410.00
2016	6	1819	6213441	211 Coral Street	14A	LMH	\$490.00
					14A	Matrix Code	\$59,224.62
2017	1	1772	6110462	Homeowner Rehab Admin	14H	LMC	\$5,767.12
2017	1	1772	6111833	Homeowner Rehab Admin	14H	LMC	\$657.84
2017	1	1772	6113406	Homeowner Rehab Admin	14H	LMC	\$61.08
2017	1	1772	6122851	Homeowner Rehab Admin	14H	LMC	\$5,067.91
2017	1	1772	6132699	Homeowner Rehab Admin	14H	LMC	\$4,710.07
2017	1	1772	6140921	Homeowner Rehab Admin	14H	LMC	\$4,533.56
2017	1	1772	6151378	Homeowner Rehab Admin	14H	LMC	\$5,112.55
2017	1	1772	6161597	Homeowner Rehab Admin	14H	LMC	\$4,902.73
2017	1	1772	6171737	Homeowner Rehab Admin	14H	LMC	\$3,688.85
2017	1	1772	6180721	Homeowner Rehab Admin	14H	LMC	\$5,785.32
2017	1	1772	6188770	Homeowner Rehab Admin	14H	LMC	\$5,852.70
2017	1	1772	6207729	Homeowner Rehab Admin	14H	LMC	\$7,195.91
2017	1	1772	6215850	Homeowner Rehab Admin	14H	LMC	\$4,837.69
2017	8	1801	6186664	534 High Street	14H	LMH	\$586.00
2018	1	1786	6113354	Homeowner Rehab Admin	14H	LMC	\$238.69
2018	1	1786	6122851	Homeowner Rehab Admin	14H	LMC	\$5,183.37
2018	1	1786	6128119	Homeowner Rehab Admin	14H	LMC	\$100.00



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Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2018	1	1786	6129242	Homeowner Rehab Admin	14H	LMC	\$238.69
2018	1	1786	6131980	Homeowner Rehab Admin	14H	LMC	\$51.00
2018	1	1786	6134407	Homeowner Rehab Admin	14H	LMC	\$35.31
2018	1	1786	6136532	Homeowner Rehab Admin	14H	LMC	\$1,096.56
2018	1	1786	6140921	Homeowner Rehab Admin	14H	LMC	\$225.69
2018	1	1786	6149096	Homeowner Rehab Admin	14H	LMC	\$244.06
2018	1	1786	6152895	Homeowner Rehab Admin	14H	LMC	\$81.67
2018	1	1786	6155484	Homeowner Rehab Admin	14H	LMC	\$155.31
2018	1	1786	6159243	Homeowner Rehab Admin	14H	LMC	\$192.67
2018	1	1786	6165403	Homeowner Rehab Admin	14H	LMC	\$111.00
2018	1	1786	6168093	Homeowner Rehab Admin	14H	LMC	\$100.00
2018	1	1786	6169526	Homeowner Rehab Admin	14H	LMC	\$81.67
2018	1	1786	6171737	Homeowner Rehab Admin	14H	LMC	\$35.31
2018	1	1786	6174547	Homeowner Rehab Admin	14H	LMC	\$111.00
2018	1	1786	6180721	Homeowner Rehab Admin	14H	LMC	\$116.98
2018	1	1786	6183205	Homeowner Rehab Admin	14H	LMC	\$51.00
2018	1	1786	6188770	Homeowner Rehab Admin	14H	LMC	\$181.67
2018	1	1786	6191207	Homeowner Rehab Admin	14H	LMC	\$60.00
2018	1	1786	6193012	Homeowner Rehab Admin	14H	LMC	\$51.00
2018	1	1786	6197475	Homeowner Rehab Admin	14H	LMC	\$81.67
2018	1	1786	6201288	Homeowner Rehab Admin	14H	LMC	\$35.31
2018	1	1786	6203298	Homeowner Rehab Admin	14H	LMC	\$30,243.71
2018	1	1786	6205773	Homeowner Rehab Admin	14H	LMC	\$2,493.50
2018	1	1786	6207729	Homeowner Rehab Admin	14H	LMC	\$1,869.26
2018	1	1786	6213441	Homeowner Rehab Admin	14H	LMC	\$3,840.93
2018	1	1786	6215850	Homeowner Rehab Admin	14H	LMC	\$797.19
2018	1	1786	6220505	Homeowner Rehab Admin	14H	LMC	\$149.18
2018	1	1786	6226104	Homeowner Rehab Admin	14H	LMC	\$6,132.04
					14H	Matrix Code	\$113,144.77
2015	8	1781	6122851	329 W King Street, Apt 1	14I	LMH	\$1,966.00
2015	8	1782	6124951	429 N Charlotte Street, Apt 2	14I	LMH	\$2,566.00
2015	8	1784	6128119	709 N Plum Street	14I	LMH	\$1,351.00
2015	8	1789	6122851	410 S Prince Street	14I	LMH	\$2,754.00
2015	8	1790	6131980	635 East End Avenue	14I	LMH	\$1,867.00
2015	8	1793	6159243	614 W Marion Street	14I	LMH	\$2,137.00
2017	8	1795	6155484	546 W Orange Street	14I	LMH	\$1,454.00
2017	8	1795	6163601	546 W Orange Street	14I	LMH	\$73.00
2017	8	1796	6168089	520 Laurel Street	14I	LMH	\$2,063.00
2017	8	1797	6186664	612 N Franklin Street	14I	LMH	\$939.00
2017	8	1799	6191207	454 Fremont Street	14I	LMH	\$375.00
					14I	Matrix Code	\$17,545.00
2017	1	1739	6110462	Housing Code Enforcement	15	LMA	\$25,564.77
2017	1	1739	6113406	Housing Code Enforcement	15	LMA	\$350.43
2017	1	1739	6122851	Housing Code Enforcement	15	LMA	\$30,169.18
2017	1	1739	6129242	Housing Code Enforcement	15	LMA	\$435.85
2017	1	1739	6132699	Housing Code Enforcement	15	LMA	\$23,616.78
2017	1	1739	6140921	Housing Code Enforcement	15	LMA	\$23,616.78
2017	1	1739	6151378	Housing Code Enforcement	15	LMA	\$20,853.50
2017	1	1739	6161597	Housing Code Enforcement	15	LMA	\$22,612.78
2017	1	1739	6171737	Housing Code Enforcement	15	LMA	\$18,090.22
2017	1	1739	6180721	Housing Code Enforcement	15	LMA	\$18,357.33
2017	1	1739	6188770	Housing Code Enforcement	15	LMA	\$18,740.62
2017	1	1739	6196155	Housing Code Enforcement	15	LMA	\$441.96
2017	1	1739	6197475	Housing Code Enforcement	15	LMA	\$3,920.91
2018	1	1787	6122851	Housing Code Enforcement	15	LMA	\$3,050.27
2018	1	1787	6203298	Housing Code Enforcement	15	LMA	\$47,024.02



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Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2018	1	1787	6205773	Housing Code Enforcement	15	LMA	\$2,456.01
2018	1	1787	6207729	Housing Code Enforcement	15	LMA	\$28,902.01
2018	1	1787	6213441	Housing Code Enforcement	15	LMA	\$3,277.46
2018	1	1787	6215850	Housing Code Enforcement	15	LMA	\$24,555.01
2018	1	1787	6220505	Housing Code Enforcement	15	LMA	\$1,103.80
2018	1	1787	6226104	Housing Code Enforcement	15	LMA	\$26,480.47
					15	Matrix Code	\$343,620.16
Total							\$838,952.14

LINE 27 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 27

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2017	3	1770	6111833	Neighborhood Crime	05I	LMA	\$1,058.97
2018	3	1808	6203298	Neighborhood Crime Reduction	05I	LMA	\$84,848.01
2018	3	1808	6203299	Neighborhood Crime Reduction	05I	LMA	\$5,593.60
2018	3	1808	6207729	Neighborhood Crime Reduction	05I	LMA	\$6,335.88
2018	3	1808	6213441	Neighborhood Crime Reduction	05I	LMA	\$3,825.56
2018	3	1808	6215850	Neighborhood Crime Reduction	05I	LMA	\$7,898.17
2018	3	1808	6220505	Neighborhood Crime Reduction	05I	LMA	\$5,802.91
					05I	Matrix Code	\$115,363.10
Total							\$115,363.10

LINE 37 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 37

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2017	5	1738	6110462	CDBG Planning & Administration	21A		\$4,907.71
2017	5	1738	6113406	CDBG Planning & Administration	21A		\$35.86
2017	5	1738	6122851	CDBG Planning & Administration	21A		\$11,814.82
2017	5	1738	6129242	CDBG Planning & Administration	21A		\$382.00
2017	5	1738	6132699	CDBG Planning & Administration	21A		\$9,219.70
2017	5	1738	6134407	CDBG Planning & Administration	21A		\$14.70
2017	5	1738	6138604	CDBG Planning & Administration	21A		\$297.68
2017	5	1738	6140921	CDBG Planning & Administration	21A		\$9,407.23
2017	5	1738	6151378	CDBG Planning & Administration	21A		\$9,348.17
2017	5	1738	6159243	CDBG Planning & Administration	21A		\$599.95
2017	5	1738	6161597	CDBG Planning & Administration	21A		\$11,455.05
2017	5	1738	6171737	CDBG Planning & Administration	21A		\$16,695.87
2017	5	1738	6180721	CDBG Planning & Administration	21A		\$4,043.65
2018	2	1788	6203298	CDBG Planning & Administration	21A		\$28,730.81
2018	2	1788	6203299	CDBG Planning & Administration	21A		\$1,274.80
2018	2	1788	6207729	CDBG Planning & Administration	21A		\$10,120.25
2018	2	1788	6213441	CDBG Planning & Administration	21A		\$401.58
2018	2	1788	6215850	CDBG Planning & Administration	21A		\$8,037.46
2018	2	1788	6220505	CDBG Planning & Administration	21A		\$3,503.83
2018	2	1788	6226104	CDBG Planning & Administration	21A		\$9,524.67
					21A	Matrix Code	\$139,815.79
2017	5	1776	6110462	Indirect Administration	21B		\$10,382.86
2018	2	1813	6203298	Indirect Administration	21B		\$4,177.80
2018	2	1813	6203299	Indirect Administration	21B		\$50,057.20
					21B	Matrix Code	\$64,617.86
2017	3	1775	6122851	Fair Housing Services	21D		\$1,250.00
2017	3	1775	6136532	Fair Housing Services	21D		\$1,250.00
2017	3	1775	6140921	Fair Housing Services	21D		\$1,250.00



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Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2017	3	1775	6149096	Fair Housing Services	21D		\$1,250.00
2017	3	1775	6159243	Fair Housing Services	21D		\$1,250.00
2017	3	1775	6168089	Fair Housing Services	21D		\$1,250.00
2017	3	1775	6180721	Fair Housing Services	21D		\$1,250.00
2018	3	1812	6220505	Fair Housing Services	21D		\$3,750.00
Total					21D	Matrix Code	\$12,500.00
							\$216,933.65



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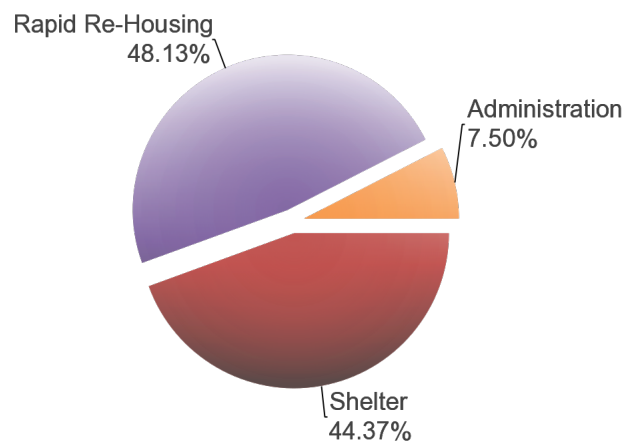
ESG Program Level Summary

Grant Number	Total Grant Amount	Total Funds Committed	Total Funds Available to Commit	% of Grant Funds Not Committed	Grant Funds Drawn	% of Grant Funds Drawn	Available to Draw	% Remaining to Draw
E18MC420010	\$139,155.00	\$139,155.00	\$0.00	0.00%	\$56,913.06	40.90%	\$82,241.94	59.10%

ESG Program Components

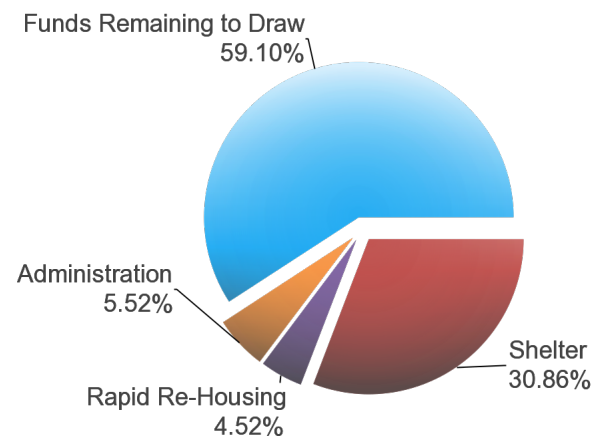
Activity Type	Total Committed to Activities	% of Grant Committed	Drawn Amount	% of Grant Drawn
Street Outreach	\$0.00	0.00%	\$0.00	0.00%
Shelter	\$61,750.00	44.37%	\$42,942.96	30.86%
Homeless Prevention	\$0.00	0.00%	\$0.00	0.00%
Rapid Re-Housing	\$66,970.00	48.13%	\$6,292.99	4.52%
Data Collection (HMIS)	\$0.00	0.00%	\$0.00	0.00%
Administration	\$10,435.00	7.50%	\$7,677.11	5.52%
Funds Not Committed	\$0.00	0.00%	\$0.00	0.00%
Funds Remaining to Draw	\$0.00	0.00%	\$82,241.94	59.10%
Total	\$139,155.00	100.00%	\$139,155.00	100.00%

Funds Committed



Street Outreach Shelter Homeless Prevention Rapid Re-Housing
Data Collection (HMIS) Administration Funds Not Committed Funds Remaining to Draw

Funds Drawn



Street Outreach Shelter Homeless Prevention Rapid Re-Housing
Data Collection (HMIS) Administration Funds Not Committed Funds Remaining to Draw



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24-Month Grant Expenditure Deadline

All of the recipient's grant must be expended for eligible activity costs within 24 months after the date HUD signs the grant agreement with the recipient. Expenditure means either an actual cash disbursement for a direct charge for a good or service or an indirect cost or the accrual of a direct charge for a good or service or an indirect cost. This report uses draws in IDIS to measure expenditures. HUD allocated Fiscal Year 2011 ESG funds in two allocations. For FY2011, this Obligation Date is the date of the first allocation. This report does not list the Obligation Date, does not calculate the Expenditure Deadline, and does not track the Days Remaining for the FY 2011 second allocation.

Grant Amount: \$139,155.00

Grant Number	Draws to Date	HUD Obligation Date	Expenditure Deadline	Days Remaining to Meet Requirement Date	Expenditures Required
E18MC420010	\$56,913.06	08/22/2018	08/22/2020	536	\$82,241.94

60% Cap on Emergency Shelter and Street Outreach

The cap refers to the total amount of the recipient's fiscal year grant, allowed for emergency shelter and street outreach activities, is capped at 60 percent. This amount cannot exceed the greater of: (1) 60% of the overall grant for the year; or, (2) the amount of Fiscal Year 2010 ESG funds committed for homeless assistance activities.

Amount Committed to Shelter	Amount Committed to Street Outreach	Total Amount Committed to Shelter and Street Outreach	% Committed to Shelter and Street Outreach	2010 Funds Committed to Homeless Assistance Activities	Total Drawn for Shelter and Street Outreach	% Drawn for Shelter and Street Outreach
\$61,750.00	\$0.00	\$61,750.00	44.37%		\$42,942.96	30.86%

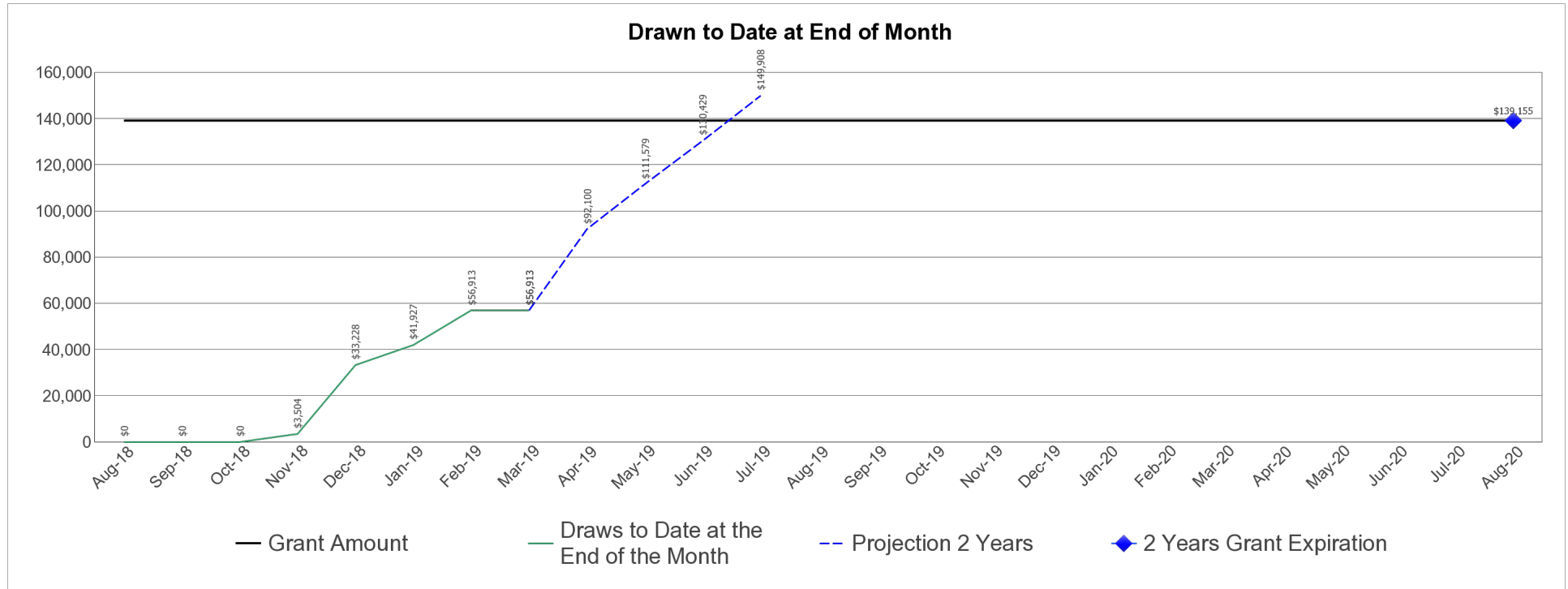


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ESG Draws By Month (at the total grant level):

Grant Amount: 139,155.00



ESG Draws By Quarter (at the total grant level):

Quarter End Date	Draws for the Quarter	Draws to Date at the End of the Quarter	% Drawn for the Quarter	% Drawn to Date at End of Quarter
09/30/2018	\$0.00	\$0.00	0.00%	0.00%
12/31/2018	\$33,227.52	\$33,227.52	23.88%	23.88%
03/31/2019	\$23,685.54	\$56,913.06	17.02%	40.90%



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ESG Subrecipient Commitments and Draws by Activity Category :

Subrecipient	Activity Type	Committed	Drawn
LANCASTER	Administration	\$10,435.00	\$7,677.11
	Total	\$10,435.00	\$7,677.11
	Total Remaining to be Drawn		\$2,757.89
	Percentage Remaining to be Drawn		26.43%
YWCA Lancaster	Shelter	\$61,750.00	\$42,942.96
	Total	\$61,750.00	\$42,942.96
	Total Remaining to be Drawn		\$18,807.04
	Percentage Remaining to be Drawn		30.46%
COMMUNITY ACTION PARTNERSHIP OF LANCASTER COUNTY	Rapid Re-Housing	\$66,970.00	\$6,292.99
	Total	\$66,970.00	\$6,292.99
	Total Remaining to be Drawn		\$60,677.01
	Percentage Remaining to be Drawn		90.60%



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ESG Subrecipients by Activity Category

Activity Type	Subrecipient
Shelter	YWCA Lancaster
Rapid Re-Housing	COMMUNITY ACTION PARTNERSHIP OF LANCASTER COUNTY
Administration	LANCASTER

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

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 1st preference when scheduling intake assessments.
 5. Persons who are at imminent risk of homelessness within 24 hours will be given 2nd 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 1st of each year to Jason Harnish via email: 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
High barriers— Program participants typically have two or more of the following barriers <ul style="list-style-type: none">• Long-term substance use disorder• Previous evictions• Zero Income• Previous episodes of homelessness• Chronic homelessness
Medium barriers— Program participants typically have at least one of the following barriers <ul style="list-style-type: none">• Zero Income• Substance use disorder• Significant criminal history• Young parent (under 25) with 2 or more children
Low barriers— <ul style="list-style-type: none">• Positive rental history• Consistent income• Work history



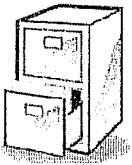
Homeless Definition

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



Homeless Definition

RECORDKEEPING REQUIREMENTS



Category 1	Literally Homeless	<ul style="list-style-type: none"> Written observation by the outreach worker; <u>or</u> Written referral by another housing or service provider; <u>or</u> Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter; For individuals exiting an institution—one of the forms of evidence above <u>and</u>: <ul style="list-style-type: none"> discharge paperwork <u>or</u> written/oral referral, <u>or</u> written record of intake worker's due diligence to obtain above evidence <u>and</u> certification by individual that they exited institution
		<ul style="list-style-type: none"> A court order resulting from an eviction action notifying the individual or family that they must leave; <u>or</u> For individual and families leaving a hotel or motel—evidence that they lack the financial resources to stay; <u>or</u> A documented and verified oral statement; <u>and</u> Certification that no subsequent residence has been identified; <u>and</u> Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing
		<ul style="list-style-type: none"> 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> Certification of no PH in last 60 days; <u>and</u> 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> Documentation of special needs <u>or</u> 2 or more barriers
		<ul style="list-style-type: none"> <i>For victim service providers:</i> <ul style="list-style-type: none"> 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. <i>For non-victim service providers:</i> <ul style="list-style-type: none"> 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> Certification by the individual or head of household that no subsequent residence has been identified; <u>and</u> Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.



At Risk of Homelessness

CRITERIA FOR DEFINING AT RISK OF HOMELESSNESS	Category 1	Individuals and Families	<p>An individual or family who:</p> <ul style="list-style-type: none"> (i) Has an annual income below <u>30%</u> of median family income for the area; <u>AND</u> (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> (iii) Meets one of the following conditions: <ul style="list-style-type: none"> (A) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; <u>OR</u> (B) Is living in the home of another because of economic hardship; <u>OR</u> (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> (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> (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> (F) Is exiting a publicly funded institution or system of care; <u>OR</u> (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
	Category 2	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
	Category 3	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.



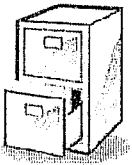
Homeless Definition

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	Category 3	Homeless under other Federal statutes	<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"> (i) Are defined as homeless under the other listed federal statutes; (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; (iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; <u>and</u> (iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers
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Homeless Definition

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		<ul style="list-style-type: none"> A court order resulting from an eviction action notifying the individual or family that they must leave; <u>or</u> For individual and families leaving a hotel or motel—evidence that they lack the financial resources to stay; <u>or</u> A documented and verified oral statement; <u>and</u> Certification that no subsequent residence has been identified; <u>and</u> Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing
		<ul style="list-style-type: none"> 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> Certification of no PH in last 60 days; <u>and</u> 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> Documentation of special needs <u>or</u> 2 or more barriers
		<ul style="list-style-type: none"> <i>For victim service providers:</i> <ul style="list-style-type: none"> 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. <i>For non-victim service providers:</i> <ul style="list-style-type: none"> 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> Certification by the individual or head of household that no subsequent residence has been identified; <u>and</u> Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.



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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

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 immigrants 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.

Diversion 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.

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](#)), the Residential Lead-Based Paint Hazard Reduction Act of 1992 ([42 U.S.C. 4851-4856](#)), and implementing regulations in 24 CFR part [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 program 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.¹ 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.

¹ 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.](#)).

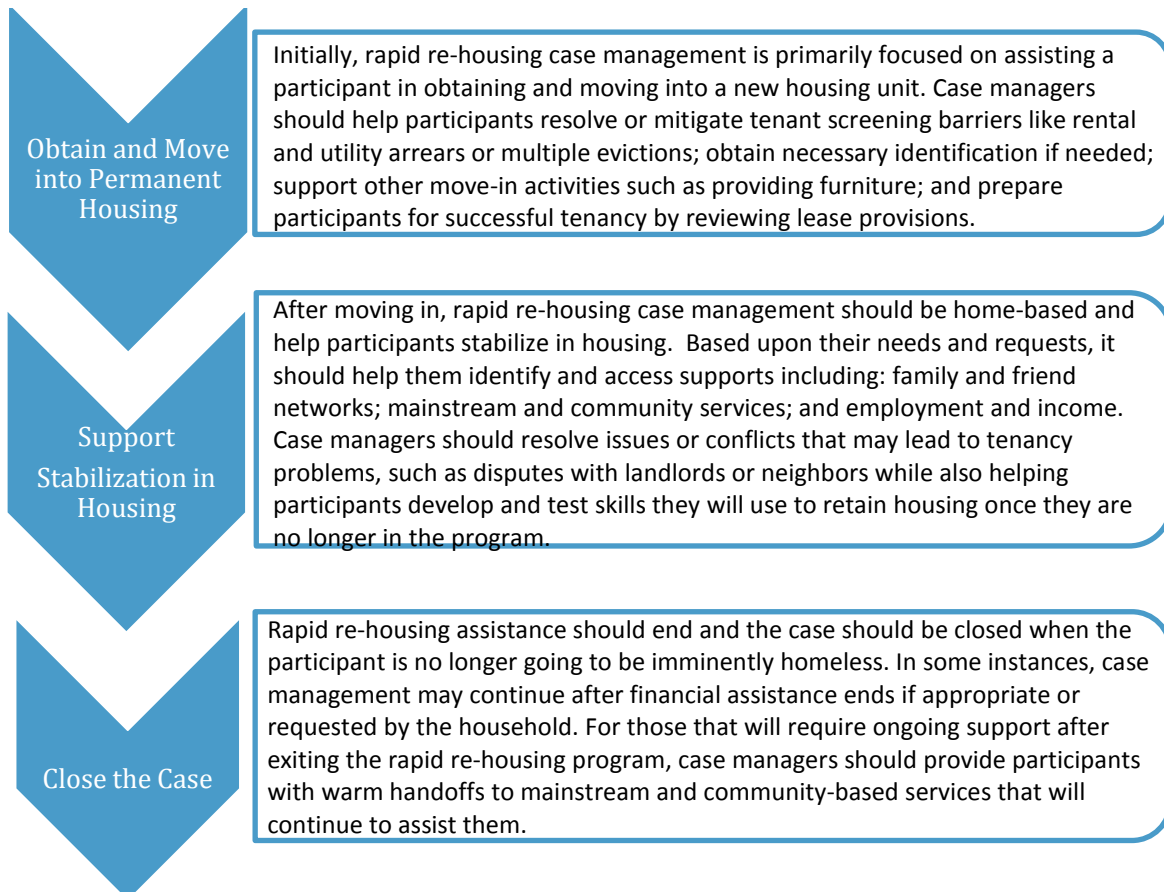
Examples of Meeting Program Standards: Rent and Move-In Assistance

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 households' 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.² 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.

² 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 & 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 & 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 & 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. 2nd 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

A handwritten signature in black ink, appearing to read "Jen Koppel", is written over a faint, larger signature.



HUD ESG CAPER

Grant: **ESG: Lancaster City - PA - Report** Type: **CAPER**

Report Date Range

1/1/2018 to 12/31/2018

Q01a. Contact Information

First name	Susannah
Middle name	Siobhan
Last name	Bartlett
Suffix	
Title	Community Development Administrator
Street Address 1	120 North Duke Street (PO Box 1599)
Street Address 2	
City	Lancaster
State	Pennsylvania
ZIP Code	17608
E-mail Address	subartlett@cityoflancasterpa.com
Phone Number	(717)291-4743
Extension	
Fax Number	

Q01b. Grant Information

As of 1/11/2019

ESG Information from IDIS

FISCAL YEAR	GRANT NUMBER	CURRENT AUTHORIZED AMOUNT	TOTAL DRAWN	BALANCE	OBLIGATION DATE	EXPENDITURE DEADLINE
2018	E18MC420010	\$139,155.00	\$40,536.96	\$98,618.04	8/22/2018	8/22/2020
2017	E17MC420010	\$141,883.00	\$141,883.00	\$0	10/19/2017	10/19/2019
2016	E16MC420010	\$140,679.00	\$140,679.00	\$0	7/14/2016	7/14/2018
2015	E15MC420010	\$139,052.00	\$139,052.00	\$0	6/24/2015	6/24/2017
2014	E14MC420010	\$126,639.00	\$126,639.00	\$0	7/10/2014	7/10/2016
2013						
2012						
2011						
Total		\$687,408.00	\$588,789.96	\$98,618.04		

CAPER reporting includes funds used from fiscal year:

Project types carried out during the program year:

Enter the number of each type of projects funded through ESG during this program year.

Street Outreach	0
Emergency Shelter	2
Transitional Housing (grandfathered under ES)	0
Day Shelter (funded under ES)	0
Rapid Re-Housing	2
Homelessness Prevention	0

Q01c. Additional Information**HMIS****Comparable Database**

Are 100% of the project(s) funded through ESG, which are allowed to use HMIS, entering data into HMIS?	Yes
Have all of the projects entered data into Sage via a CSV - CAPER Report upload?	Yes
Are 100% of the project(s) funded through ESG, which are allowed to use a comparable database, entering data into the comparable database?	Yes
Have all of the projects entered data into Sage via a CSV - CAPER Report upload?	No
→ If no, how many projects were provided with a one-time exception template to complete?	1
→ If no, how many projects have submitted their plan for meeting the CSV-CAPER report generation requirement for the next reporting year?	1

Q04a: Project Identifiers in HMIS

Organization Name	LCCEH
Organization ID	9745
Project Name	YWCA Emergency Shelter
Project ID	222
HMIS Project Type	1
Method of Tracking ES	0
Is the Services Only (HMIS Project Type 6) affiliated with a residential project?	
Identify the Project ID's of the Housing Projects this Project is Affiliated with	
CSV Exception?	No
Uploaded via emailed hyperlink?	Yes
Email unique ID record link	w484cZGYeT
Project name (user-specified)	YWCA Emergency Shelter Project
Project type (user-specified)	Emergency Shelter
Organization Name	DVS
Organization ID	72863
Project Name	DVS- Rapid Re-Housing
Project ID	314
HMIS Project Type	13
Method of Tracking ES	
Is the Services Only (HMIS Project Type 6) affiliated with a residential project?	
Identify the Project ID's of the Housing Projects this Project is Affiliated with	
CSV Exception?	No
Uploaded via emailed hyperlink?	Yes
Email unique ID record link	UqYIMV6GCx
Project name (user-specified)	Community Action Partnership
Project type (user-specified)	PH - Rapid Re-Housing

Q05a: Report Validations Table

Total Number of Persons Served	154
Number of Adults (Age 18 or Over)	63
Number of Children (Under Age 18)	91
Number of Persons with Unknown Age	0
Number of Leavers	63
Number of Adult Leavers	25
Number of Adult and Head of Household Leavers	25
Number of Stayers	91
Number of Adult Stayers	38
Number of Veterans	0
Number of Chronically Homeless Persons	4
Number of Youth Under Age 25	8
Number of Parenting Youth Under Age 25 with Children	6
Number of Adult Heads of Household	62
Number of Child and Unknown-Age Heads of Household	0
Heads of Households and Adult Stayers in the Project 365 Days or More	19

Q06a: Data Quality: Personally Identifying Information (PII)

Data Element	Client Doesn't Know/Refused	Information Missing	Data Issues	% of Error Rate
Name	0	0	0	0.00 %
Social Security Number	15	2	13	19.48 %
Date of Birth	0	0	0	0.00 %
Race	5	0	0	3.25 %
Ethnicity	0	0	0	0.00 %
Gender	0	0	0	0.00 %
Overall Score				

Q06b: Data Quality: Universal Data Elements

	Error Count	% of Error Rate
Veteran Status	0	0.00 %
Project Start Date	0	0.00 %
Relationship to Head of Household	0	0.00 %
Client Location	0	0.00 %
Disabling Condition	17	11.04 %

Q06c: Data Quality: Income and Housing Data Quality

	Error Count	% of Error Rate
Destination	3	4.76 %
Income and Sources at Start	0	0.00 %
Income and Sources at Annual Assessment	0	0.00 %
Income and Sources at Exit	0	0.00 %

Q06d: Data Quality: Chronic Homelessness

	Count of Total Records	Missing Time in Institution	Missing Time in Housing	Approximate Date Started DK/R/missing	Number of Times DK/R/missing	Number of Months DK/R/missing	% of Records Unable to Calculate
ES, SH, Street Outreach	1	0	0	0	0	0	0.00 %
TH	0	0	0	0	0	0	--
PH (All)	0	0	0	0	0	0	--
Total	1	0	0	0	0	0	100.00 %

Q06e: Data Quality: Timeliness

	Number of Project Start Records	Number of Project Exit Records
0 days	52	11
1-3 Days	0	6
4-6 Days	3	9
7-10 Days	7	3
11+ Days	10	34

Q06f: Data Quality: Inactive Records: Street Outreach & Emergency Shelter

	# of Records	# of Inactive Records	% of Inactive Records
Contact (Adults and Heads of Household in Street Outreach or ES - NBN)	0	0	--
Bed Night (All Clients in ES - NBN)	0	0	--

Q07a: Number of Persons Served

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Adults	63	16	47	0	0
Children	91	0	91	0	0
Client Doesn't Know/ Client Refused	0	0	0	0	0
Data Not Collected	0	0	0	0	0
Total	154	16	138	0	0

Q08a: Households Served

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Total Households	62	16	46	0	0

Q08b: Point-in-Time Count of Households on the Last Wednesday

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
January	35	9	26	0	0
April	40	12	28	0	0
July	40	12	28	0	0
October	40	13	27	0	0

Q09a: Number of Persons Contacted

	All Persons Contacted	First contact – NOT staying on the Streets, ES, or SH	First contact – WAS staying on Streets, ES, or SH	First contact – Worker unable to determine
Once	0	0	0	0
2-5 Times	0	0	0	0
6-9 Times	0	0	0	0
10+ Times	0	0	0	0
Total Persons Contacted	0	0	0	0

Q09b: Number of Persons Engaged

	All Persons Contacted	First contact – NOT staying on the Streets, ES, or SH	First contact – WAS staying on Streets, ES, or SH	First contact – Worker unable to determine
Once	0	0	0	0
2-5 Contacts	0	0	0	0
6-9 Contacts	0	0	0	0
10+ Contacts	0	0	0	0
Total Persons Engaged	0	0	0	0
Rate of Engagement	0.00	0.00	0.00	0.00

Q10a: Gender of Adults

	Total	Without Children	With Children and Adults	Unknown Household Type
Male	6	2	4	0
Female	57	14	43	0
Trans Female (MTF or Male to Female)	0	0	0	0
Trans Male (FTM or Female to Male)	0	0	0	0
Gender Non-Conforming (i.e. not exclusively male or female)	0	0	0	0
Client Doesn't Know/Client Refused	0	0	0	0
Data Not Collected	0	0	0	0
Subtotal	63	16	47	0

Q10b: Gender of Children

	Total	With Children and Adults	With Only Children	Unknown Household Type
Male	50	50	0	0
Female	41	41	0	0
Trans Female (MTF or Male to Female)	0	0	0	0
Trans Male (FTM or Female to Male)	0	0	0	0
Gender Non-Conforming (i.e. not exclusively male or female)	0	0	0	0
Client Doesn't Know/Client Refused	0	0	0	0
Data Not Collected	0	0	0	0
Subtotal	91	91	0	0

Q10c: Gender of Persons Missing Age Information

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Male	0	0	0	0	0
Female	0	0	0	0	0
Trans Female (MTF or Male to Female)	0	0	0	0	0
Trans Male (FTM or Female to Male)	0	0	0	0	0
Gender Non-Conforming (i.e. not exclusively male or female)	0	0	0	0	0
Client Doesn't Know/Client Refused	0	0	0	0	0
Data Not Collected	0	0	0	0	0
Subtotal	0	0	0	0	0

Q10d: Gender by Age Ranges

	Total	Under Age 18	Age 18-24	Age 25-61	Age 62 and over	Client Doesn't Know/ Client Refused	Data Not Collected
Male	56	50	1	5	0	0	0
Female	98	41	8	49	0	0	0
Trans Female (MTF or Male to Female)	0	0	0	0	0	0	0
Trans Male (FTM or Female to Male)	0	0	0	0	0	0	0
Gender Non-Conforming (i.e. not exclusively male or female)	0	0	0	0	0	0	0
Client Doesn't Know/Client Refused	0	0	0	0	0	0	0
Data Not Collected	0	0	0	0	0	0	0
Subtotal	154	91	9	54	0	0	0

Q11: Age

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Under 5	37	0	37	0	0
5 - 12	44	0	44	0	0
13 - 17	10	0	10	0	0
18 - 24	9	2	7	0	0
25 - 34	28	2	26	0	0
35 - 44	12	2	10	0	0
45 - 54	12	8	4	0	0
55 - 61	2	2	0	0	0
62+	0	0	0	0	0
Client Doesn't Know/Client Refused	0	0	0	0	0
Data Not Collected	0	0	0	0	0
Total	154	16	138	0	0

Q12a: Race

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
White	75	11	64	0	0
Black or African American	64	5	59	0	0
Asian	0	0	0	0	0
American Indian or Alaska Native	0	0	0	0	0
Native Hawaiian or Other Pacific Islander	0	0	0	0	0
Multiple Races	10	0	10	0	0
Client Doesn't Know/Client Refused	5	0	5	0	0
Data Not Collected	0	0	0	0	0
Total	154	16	138	0	0

Q12b: Ethnicity

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Non-Hispanic/Non-Latino	87	13	74	0	0
Hispanic/Latino	67	3	64	0	0
Client Doesn't Know/Client Refused	0	0	0	0	0
Data Not Collected	0	0	0	0	0
Total	154	16	138	0	0

Q13a1: Physical and Mental Health Conditions at Start

	Total Persons	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Mental Health Problem	20	3	17	0	0
Alcohol Abuse	0	0	0	0	0
Drug Abuse	0	0	0	0	0
Both Alcohol and Drug Abuse	1	1	0	0	0
Chronic Health Condition	10	4	6	0	0
HIV/AIDS	0	0	0	0	0
Developmental Disability	9	0	9	0	0
Physical Disability	7	1	6	0	0

Q13b1: Physical and Mental Health Conditions at Exit

	Total Persons	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Mental Health Problem	6	0	6	0	0
Alcohol Abuse	0	0	0	0	0
Drug Abuse	0	0	0	0	0
Both Alcohol and Drug Abuse	0	0	0	0	0
Chronic Health Condition	1	0	1	0	0
HIV/AIDS	0	0	0	0	0
Developmental Disability	6	0	6	0	0
Physical Disability	3	0	3	0	0

Q13c1: Physical and Mental Health Conditions for Stayers

	Total Persons	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Mental Health Problem	9	3	6	0	0
Alcohol Abuse	0	0	0	0	0
Drug Abuse	0	0	0	0	0
Both Alcohol and Drug Abuse	1	1	0	0	0
Chronic Health Condition	8	4	4	0	0
HIV/AIDS	0	0	0	0	0
Developmental Disability	3	0	3	0	0
Physical Disability	4	1	3	0	0

Q14a: Domestic Violence History

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Yes	55	12	43	0	0
No	4	1	3	0	0
Client Doesn't Know/Client Refused	0	0	0	0	0
Data Not Collected	4	3	1	0	0
Total	63	16	47	0	0

Q14b: Persons Fleeing Domestic Violence

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Yes	41	11	30	0	0
No	14	1	13	0	0
Client Doesn't Know/Client Refused	0	0	0	0	0
Data Not Collected	0	0	0	0	0
Total	55	12	43	0	0

Q15: Living Situation

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Homeless Situations	0	0	0	0	0
Emergency shelter, including hotel or motel paid for with emergency shelter voucher	44	12	32	0	0
Transitional housing for homeless persons (including homeless youth)	0	0	0	0	0
Place not meant for habitation	5	1	4	0	0
Safe Haven	4	1	3	0	0
Interim Housing	0	0	0	0	0
Subtotal	53	14	39	0	0
Institutional Settings	0	0	0	0	0
Psychiatric hospital or other psychiatric facility	0	0	0	0	0
Substance abuse treatment facility or detox center	0	0	0	0	0
Hospital or other residential non-psychiatric medical facility	0	0	0	0	0
Jail, prison or juvenile detention facility	0	0	0	0	0
Foster care home or foster care group home	0	0	0	0	0
Long-term care facility or nursing home	0	0	0	0	0
Residential project or halfway house with no homeless criteria	0	0	0	0	0
Subtotal	0	0	0	0	0
Other Locations	0	0	0	0	0
Permanent housing (other than RRH) for formerly homeless persons	0	0	0	0	0
Owned by client, no ongoing housing subsidy	0	0	0	0	0
Owned by client, with ongoing housing subsidy	0	0	0	0	0
Rental by client, no ongoing housing subsidy	0	0	0	0	0
Rental by client, with VASH subsidy	0	0	0	0	0
Rental by client with GPD TIP subsidy	0	0	0	0	0
Rental by client, with other housing subsidy (including RRH)	2	0	2	0	0
Hotel or motel paid for without emergency shelter voucher	1	0	1	0	0
Staying or living in a friend's room, apartment or house	2	0	2	0	0
Staying or living in a family member's room, apartment or house	3	0	3	0	0
Client Doesn't Know/Client Refused	0	0	0	0	0
Data Not Collected	3	3	0	0	0
Subtotal	11	3	8	0	0
Total	63	16	47	0	0

Q20a: Type of Non-Cash Benefit Sources

	Benefit at Start	Benefit at Latest Annual Assessment for Stayers	Benefit at Exit for Leavers
Supplemental Nutritional Assistance Program	41	3	20
WIC	4	0	3
TANF Child Care Services	2	0	0
TANF Transportation Services	0	0	0
Other TANF-Funded Services	1	0	0
Other Source	2	0	1

Q21: Health Insurance

	At Start	At Annual Assessment for Stayers	At Exit for Leavers
Medicaid	135	11	55
Medicare	3	0	1
State Children's Health Insurance Program	0	0	0
VA Medical Services	1	0	0
Employer Provided Health Insurance	6	0	1
Health Insurance Through COBRA	0	0	0
Private Pay Health Insurance	0	0	0
State Health Insurance for Adults	0	0	0
Indian Health Services Program	0	0	0
Other	0	0	0
No Health Insurance	9	2	4
Client Doesn't Know/Client Refused	1	0	0
Data Not Collected	3	31	4
Number of Stayers Not Yet Required to Have an Annual Assessment	0	43	0
1 Source of Health Insurance	139	11	53
More than 1 Source of Health Insurance	3	0	2

Q22a2: Length of Participation – ESG Projects

	Total	Leavers	Stayers
0 to 7 days	2	2	0
8 to 14 days	0	0	0
15 to 21 days	0	0	0
22 to 30 days	3	3	0
31 to 60 days	21	14	7
61 to 90 days	9	9	0
91 to 180 days	20	17	3
181 to 365 days	43	10	33
366 to 730 days (1-2 Yrs)	56	8	48
731 to 1,095 days (2-3 Yrs)	0	0	0
1,096 to 1,460 days (3-4 Yrs)	0	0	0
1,461 to 1,825 days (4-5 Yrs)	0	0	0
More than 1,825 days (> 5 Yrs)	0	0	0
Data Not Collected	0	0	0
Total	154	63	91

Q22c: Length of Time between Project Start Date and Housing Move-in Date (post 10/1/2018)

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
7 days or less	1	1	0	0	0
8 to 14 days	1	1	0	0	0
15 to 21 days	6	0	6	0	0
22 to 30 days	7	2	5	0	0
31 to 60 days	7	2	5	0	0
61 to 180 days	14	2	12	0	0
181 to 365 days	0	0	0	0	0
366 to 730 days (1-2 Yrs)	0	0	0	0	0
Total (persons moved into housing)	36	8	28	0	0
Average length of time to housing	56.00	39.00	60.00	--	--
Persons who were exited without move-in	10	1	9	0	0
Total persons	46	9	37	0	0

Q22c: RRH Length of Time between Project Start Date and Housing Move-in Date (pre 10/1/2018)

Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
- no data -				

Q22d: Length of Participation by Household Type

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
7 days or less	2	0	2	0	0
8 to 14 days	0	0	0	0	0
15 to 21 days	0	0	0	0	0
22 to 30 days	3	0	3	0	0
31 to 60 days	21	0	21	0	0
61 to 90 days	9	1	8	0	0
91 to 180 days	20	3	17	0	0
181 to 365 days	43	7	36	0	0
366 to 730 days (1-2 Yrs)	56	5	51	0	0
731 to 1,095 days (2-3 Yrs)	0	0	0	0	0
1,096 to 1,460 days (3-4 Yrs)	0	0	0	0	0
1,461 to 1,825 days (4-5 Yrs)	0	0	0	0	0
More than 1,825 days (> 5 Yrs)	0	0	0	0	0
Data Not Collected	0	0	0	0	0
Total	154	16	138	0	0

Q23a: Exit Destination – More Than 90 Days

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Permanent Destinations	0	0	0	0	0
Moved from one HOPWA funded project to HOPWA PH	0	0	0	0	0
Owned by client, no ongoing housing subsidy	0	0	0	0	0
Owned by client, with ongoing housing subsidy	0	0	0	0	0
Rental by client, no ongoing housing subsidy	7	1	6	0	0
Rental by client, with VASH housing subsidy	0	0	0	0	0
Rental by client, with GPD TIP housing subsidy	0	0	0	0	0
Rental by client, with other ongoing housing subsidy	0	0	0	0	0
Permanent housing (other than RRH) for formerly homeless persons	0	0	0	0	0
Staying or living with family, permanent tenure	0	0	0	0	0
Staying or living with friends, permanent tenure	0	0	0	0	0
Rental by client, with RRH or equivalent subsidy	1	0	1	0	0
Subtotal	8	1	7	0	0
Temporary Destinations	0	0	0	0	0
Emergency shelter, including hotel or motel paid for with emergency shelter voucher	0	0	0	0	0
Moved from one HOPWA funded project to HOPWA TH	0	0	0	0	0
Transitional housing for homeless persons (including homeless youth)	0	0	0	0	0
Staying or living with family, temporary tenure (e.g. room, apartment or house)	0	0	0	0	0
Staying or living with friends, temporary tenure (e.g. room, apartment or house)	0	0	0	0	0
Place not meant for habitation (e.g., a vehicle, an abandoned building, bus/train/subway station/airport or anywhere outside)	0	0	0	0	0
Safe Haven	0	0	0	0	0
Hotel or motel paid for without emergency shelter voucher	0	0	0	0	0
Subtotal	0	0	0	0	0
Institutional Settings	0	0	0	0	0
Foster care home or group foster care home	0	0	0	0	0
Psychiatric hospital or other psychiatric facility	0	0	0	0	0
Substance abuse treatment facility or detox center	0	0	0	0	0
Hospital or other residential non-psychiatric medical facility	0	0	0	0	0
Jail, prison, or juvenile detention facility	0	0	0	0	0
Long-term care facility or nursing home	0	0	0	0	0
Subtotal	0	0	0	0	0
Other Destinations	0	0	0	0	0
Residential project or halfway house with no homeless criteria	0	0	0	0	0
Deceased	0	0	0	0	0
Other	0	0	0	0	0
Client Doesn't Know/Client Refused	0	0	0	0	0
Data Not Collected (no exit interview completed)	4	0	4	0	0
Subtotal	4	0	4	0	0
Total	12	1	11	0	0
Total persons exiting to positive housing destinations	8	1	7	0	0
Total persons whose destinations excluded them from the calculation	0	0	0	0	0
Percentage	66.67 %	100.00 %	63.64 %	--	--

Q23b: Exit Destination – 90 Days or Less

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Permanent Destinations	0	0	0	0	0
Moved from one HOPWA funded project to HOPWA PH	0	0	0	0	0
Owned by client, no ongoing housing subsidy	0	0	0	0	0
Owned by client, with ongoing housing subsidy	0	0	0	0	0
Rental by client, no ongoing housing subsidy	4	0	4	0	0
Rental by client, with VASH housing subsidy	0	0	0	0	0
Rental by client, with GPD TIP housing subsidy	0	0	0	0	0
Rental by client, with other ongoing housing subsidy	0	0	0	0	0
Permanent housing (other than RRH) for formerly homeless persons	0	0	0	0	0
Staying or living with family, permanent tenure	0	0	0	0	0
Staying or living with friends, permanent tenure	0	0	0	0	0
Rental by client, with RRH or equivalent subsidy	0	0	0	0	0
Subtotal	4	0	4	0	0
Temporary Destinations	0	0	0	0	0
Emergency shelter, including hotel or motel paid for with emergency shelter voucher	0	0	0	0	0
Moved from one HOPWA funded project to HOPWA TH	0	0	0	0	0
Transitional housing for homeless persons (including homeless youth)	0	0	0	0	0
Staying or living with family, temporary tenure (e.g. room, apartment or house)	4	0	4	0	0
Staying or living with friends, temporary tenure (e.g. room, apartment or house)	0	0	0	0	0
Place not meant for habitation (e.g., a vehicle, an abandoned building, bus/train/subway station/airport or anywhere outside)	0	0	0	0	0
Safe Haven	0	0	0	0	0
Hotel or motel paid for without emergency shelter voucher	0	0	0	0	0
Subtotal	4	0	4	0	0
Institutional Settings	0	0	0	0	0
Foster care home or group foster care home	0	0	0	0	0
Psychiatric hospital or other psychiatric facility	0	0	0	0	0
Substance abuse treatment facility or detox center	0	0	0	0	0
Hospital or other residential non-psychiatric medical facility	0	0	0	0	0
Jail, prison, or juvenile detention facility	0	0	0	0	0
Long-term care facility or nursing home	0	0	0	0	0
Subtotal	0	0	0	0	0
Other Destinations	0	0	0	0	0
Residential project or halfway house with no homeless criteria	0	0	0	0	0
Deceased	0	0	0	0	0
Other	6	1	5	0	0
Client Doesn't Know/Client Refused	0	0	0	0	0
Data Not Collected (no exit interview completed)	0	0	0	0	0
Subtotal	6	1	5	0	0
Total	14	1	13	0	0
Total persons exiting to positive housing destinations	4	0	4	0	0
Total persons whose destinations excluded them from the calculation	0	0	0	0	0
Percentage	28.57 %	0.00 %	30.77 %	--	--

Q23c: Exit Destination – All persons

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Permanent Destinations	0	0	0	0	0
Moved from one HOPWA funded project to HOPWA PH	0	0	0	0	0
Owned by client, no ongoing housing subsidy	0	0	0	0	0
Owned by client, with ongoing housing subsidy	0	0	0	0	0
Rental by client, no ongoing housing subsidy	2	0	2	0	0
Rental by client, with VASH housing subsidy	0	0	0	0	0
Rental by client, with GPD TIP housing subsidy	0	0	0	0	0
Rental by client, with other ongoing housing subsidy	2	0	2	0	0
Permanent housing (other than RRH) for formerly homeless persons	0	0	0	0	0
Staying or living with family, permanent tenure	2	0	2	0	0
Staying or living with friends, permanent tenure	1	0	1	0	0
Rental by client, with RRH or equivalent subsidy	18	1	17	0	0
Subtotal	25	1	24	0	0
Temporary Destinations	0	0	0	0	0
Emergency shelter, including hotel or motel paid for with emergency shelter voucher	0	0	0	0	0
Moved from one HOPWA funded project to HOPWA TH	0	0	0	0	0
Transitional housing for homeless persons (including homeless youth)	0	0	0	0	0
Staying or living with family, temporary tenure (e.g. room, apartment or house)	0	0	0	0	0
Staying or living with friends, temporary tenure (e.g. room, apartment or house)	0	0	0	0	0
Place not meant for habitation (e.g., a vehicle, an abandoned building, bus/train/subway station/airport or anywhere outside)	0	0	0	0	0
Safe Haven	1	0	1	0	0
Hotel or motel paid for without emergency shelter voucher	0	0	0	0	0
Subtotal	1	0	1	0	0
Institutional Settings	0	0	0	0	0
Foster care home or group foster care home	0	0	0	0	0
Psychiatric hospital or other psychiatric facility	0	0	0	0	0
Substance abuse treatment facility or detox center	0	0	0	0	0
Hospital or other residential non-psychiatric medical facility	0	0	0	0	0
Jail, prison, or juvenile detention facility	0	0	0	0	0
Long-term care facility or nursing home	0	0	0	0	0
Subtotal	0	0	0	0	0
Other Destinations	0	0	0	0	0
Residential project or halfway house with no homeless criteria	0	0	0	0	0
Deceased	0	0	0	0	0
Other	0	0	0	0	0
Client Doesn't Know/Client Refused	0	0	0	0	0
Data Not Collected (no exit interview completed)	11	0	11	0	0
Subtotal	11	0	11	0	0
Total	37	1	36	0	0
Total persons exiting to positive housing destinations	25	1	24	0	0
Total persons whose destinations excluded them from the calculation	0	0	0	0	0
Percentage	67.57 %	100.00 %	66.67 %	--	--

Q24: Homelessness Prevention Housing Assessment at Exit

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Able to maintain the housing they had at project start--Without a subsidy	0	0	0	0	0
Able to maintain the housing they had at project start--With the subsidy they had at project start	0	0	0	0	0
Able to maintain the housing they had at project start--With an on-going subsidy acquired since project start	0	0	0	0	0
Able to maintain the housing they had at project start--Only with financial assistance other than a subsidy	0	0	0	0	0
Moved to new housing unit--With on-going subsidy	0	0	0	0	0
Moved to new housing unit--Without an on-going subsidy	0	0	0	0	0
Moved in with family/friends on a temporary basis	0	0	0	0	0
Moved in with family/friends on a permanent basis	0	0	0	0	0
Moved to a transitional or temporary housing facility or program	0	0	0	0	0
Client became homeless – moving to a shelter or other place unfit for human habitation	0	0	0	0	0
Client went to jail/prison	0	0	0	0	0
Client died	0	0	0	0	0
Client doesn't know/Client refused	0	0	0	0	0
Data not collected (no exit interview completed)	0	0	0	0	0
Total	0	0	0	0	0

Q25a: Number of Veterans

	Total	Without Children	With Children and Adults	Unknown Household Type
Chronically Homeless Veteran	0	0	0	0
Non-Chronically Homeless Veteran	0	0	0	0
Not a Veteran	63	16	47	0
Client Doesn't Know/Client Refused	0	0	0	0
Data Not Collected	0	0	0	0
Total	63	16	47	0

Q26b: Number of Chronically Homeless Persons by Household

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Chronically Homeless	4	0	4	0	0
Not Chronically Homeless	138	13	125	0	0
Client Doesn't Know/Client Refused	8	1	7	0	0
Data Not Collected	4	2	2	0	0
Total	154	16	138	0	0

City of Lancaster, Pennsylvania
Department of Economic and Community Development

CITIZEN PARTICIPATION PLAN

**For the Federally-Funded
FIVE-YEAR CONSOLIDATED PLAN AND
THE ONE-YEAR ACTION PLAN**

**Encompassing the
Community Development Block Grant (CDBG) Program
Home Investment Partnership (HOME) Program
Emergency Shelter Grant (ESG) Program**

PURPOSE: The purpose of Lancaster's Citizen Participation Plan is to encourage and enable the citizens of the City to participate in the development, implementation, and assessment of the City's five-year "Consolidated Plan" and its annual, one-year "Action Plan" encompassing the City's three Federally-funded Programs (see Exhibit Two for additional information regarding Lancaster's "Consolidated Plan").

The U.S. Department of Housing and Urban Development (HUD) requires that the City of Lancaster adopt a Citizen Participation Plan as a condition of eligibility for receiving Federal funds through the Community Development Block Grant (CDBG) Program, Home Investment Partnership (HOME) Program, and the Emergency Shelter Grant (ESG) Program. Although these citizen participation requirements are designed especially to encourage participation by low- and moderate-income persons, particularly those living blighted areas and in areas where Federally-funded activities are proposed, the City of Lancaster is expected to take whatever actions are appropriate to encourage the participation of all its citizens, including minorities and non-English speaking persons as well as persons with mobility, visual, or hearing disabilities.

The Americans With Disabilities Act (ADA) of 1990 and Section 504 of the Rehabilitation Act of 1973 (as amended) are federal anti-discrimination statutes designed to remove barriers which prevent individuals with disabilities from enjoying the same opportunities that are available to persons without disabilities. One important opportunity is to attend and participate in public meetings scheduled by the City to provide information to citizens and to solicit their comments regarding actions to be taken by the City. Therefore, the City has established a policy of providing accommodations for persons with disabilities who wish to attend public meetings. Accordingly, all advertisements of public meetings to be conducted by the City include the statement that (1) the meeting will be held in a facility accessible to persons with disabilities, and (2) any persons with a disability who will require an accommodation of some type while attending the public meeting should notify the City in advance so that the appropriate accommodations can be arranged. A voice phone number (291-4759)

as well as the City's TDD number (TDD 291-4761) are also provided in meeting advertisements.

CITIZEN PARTICIPATION PLAN – REQUIRED ELEMENTS

A. Citizen Involvement With Preparation of the Five-Year “Consolidated Plan” and Annual, One-Year “Action Plan”

Each year, beginning approximately seven months prior to the expected start of the Consolidated Grant Program year (July), the City of Lancaster will take the following steps to ensure that citizens of Lancaster, community-based organizations, private developers, governmental entities and others are aware of (1) the amount of federal assistance the City expects to receive each year through the CDBG, HOME, and ESG Programs through the Consolidated Plans, (2) the range of activities that may be undertaken through the Plans, (3) the focus on benefit to persons of low- and moderate-income, and (4) the strategy to minimize displacement of persons and to assist any persons displaced.

Phase One: Announcement of the Consolidated Plan Development Process

Distribution of newsletters and announcements to elected officials, citizens and community groups will be conducted to inform them regarding the start of the Consolidated Plan process, any regulatory changes anticipated, a schedule of meetings and the availability of technical assistance to groups and individuals in developing eligible activities to be assisted. These activities will be conducted in December of each year.

Phase Two: Community Briefings and Hearings

Community hearings, press briefings, and meetings with the Community Development and Planning Committee of the Lancaster City Council will be conducted to explain the Consolidated Plan requirements, solicit input regarding the planning process, and seek opinions about housing needs, non-housing community development needs, and program performance. These meetings will be conducted in December and January of each year. At least one public hearing on community needs will be formally advertised and conducted in City Council Chambers. The City will publish a community-wide display advertisement at the start of this phase announcing public meetings, the amount of expected Federal grant assistance and the range of eligible activities, the availability of technical assistance, and other required program information on the Consolidated Plan. The City will also conduct a briefing for elected officials and for subrecipients, subgrantees and Community Housing Development Organizations (CHDO's).

Phase Three: Release of Funding Applications

Release of funding applications will occur in the context of community briefings and hearings. The City of Lancaster will require that all potential project sponsors, whether City agencies, private developers, non-profit corporations or other governmental agencies, prepare and submit a funding application prior to the announced deadline for such applications. Normally the application deadline will be on or about January 31 of each year, for activities expecting to receive funds under the Consolidated Grant Program starting July 1 of each year. The availability of funding applications will be advertised no less than 30 days prior to the submission deadline for such applications. The City will provide technical assistance to organizations in completing such applications.

Phase Four: Citizen Review of Funding Applications

The City of Lancaster will submit applications for funding from the Consolidated Grant Program to the Citizens' Advisory Committee and its "Grant Application Review Panels" for critique and ranking for funding from available resources. The City of Lancaster will take account of the recommendations by Grant Application Review Panel members and will normally accept these recommendations for funding. However, the final determination regarding both the acceptance of an application and the actual funding amount awarded (which could be less than is requested) is reserved by the City of Lancaster as the entity ultimately responsible to HUD.

In the case of requests for funds from the Emergency Shelter Grant (ESG) Program, applications will be submitted separately to the "Interagency Council for the Homeless in Lancaster" for review and recommendation for funding. The Interagency Council shall be comprised of City and County Redevelopment Authority officials, homeless advocates, federal agencies such as Veterans Affairs, County Government social service departments, City and County Housing Authorities, and non-profit homeless provider agencies. The City will maintain and make public the list of members of the Interagency Council. The meetings of the Interagency Council will be public. The Interagency Council shall have responsibility to review requests for HOPWA funds, although the City itself is not expected to be the grant administrator of HOPWA funds. The Interagency Council will also provide advice on other grant applications where the City has been requested to provide a letter of support or other endorsements.

In the case of applications for Community Development Block Grant (CDBG) Program and Home Investment Partnership (HOME) Program funds, the City will, as indicated earlier, establish annually a Citizens' Advisory Committee which will be divided into at least two "Grant Application Review Panels". These panels will be representative of the citizens of Lancaster. To the extent practicable staff and board members of agencies applying for CDBG or HOME funds will not be included as members on the citizen "Review Panels." The Panels will receive

and review completed Grant Funding Applications. Also, representatives of applicant agencies will make formal presentations to Panel members. Panel members will then rank and recommend approval or denial of applications, and recommend a funding level for each approved activity. Department of Economic and Community Development (DECD) staff will provide support and assistance to each panel. Panels will normally meet February and March of each year. The DECD will insure that panel members have sufficient information to make informed decisions. Panel meetings will be public.

Appointment of "Grant application Review Panel" members will be made by the Mayor (50%) and by City Council (50%).

Phase Five: Plan Advertisement and Public Hearing Presentation

The proposed and Consolidated Grant Program, including recommendations for the funding of agencies and for the amount of funds to be allocated will be published community-wide for comment in the morning and evening Lancaster Newspapers during the month of March. A second public hearing will be advertised and conducted in City Council Chambers concerning the proposed Consolidated Plan and allocation of funds. A 30-day public comment period will be provided, starting from the date of the second public hearing. Copies of the Consolidated Plan will be available to the public during the 30-day comment period. All written comments received and all oral testimony at the public hearing will be recorded and made available as part of the Consolidated Plan.

Phase Six: Official Adoption of the Plan

The Five-Year Consolidated Plan or the annual, one-year "Action Plan," including all recommended funding allocations, will be submitted to City Council for consideration at the last City Council meeting in April. Council's role is to approve the submission of the "Action Plan" to the Federal Department of Housing and Urban Development (HUD).

Phase Seven: Submission of the Plan to HUD

The Consolidated Plan will be submitted to HUD 45 days prior to the start of the City's program year for Federally-funded activities on July 1. This period will ensure the timely processing and approval by HUD and thus to allow federal funds to be available in time for the start of the new program year.

Phase Eight: Implementation

Starting July 1 of each year the City will carry out the activities in the approved Five-year Consolidated Plan and the annual, one-year "Action Plan."

B. Program Amendments

1. CDBG Program: This section concerns the examination of, appraisal of, and comment on proposed amendments to the CDBG Program during the Program Year which would result in a significant change in the use of program funds.

During the course of the City's Program Year, it may become necessary or desirable to amend the "Action Plan." The City will amend its Plan if it decides (1) not to carry out an activity described in the Final Statement, (2) to carry out an activity not previously described, or (3) to substantially change the purpose, scope, location, or beneficiaries of a project. Lancaster's criteria for substantial change is attached as Exhibit Two.

Prior to amending its Final Statement, the City provides citizens with reasonable notice of, and opportunity to comment on, any proposed changes in its use of funds via a paid advertisement in both daily newspapers. The City considers such comments and, if deemed appropriate, modifies the Program changes. The City will subsequently make available to the public, and submit to HUD, a description of any substantial changes adopted.

2. HOME Program: The City will make public any changes in HOME activities which increase or decrease the allocation for the activity by more than 50%, to add a new activity or to delete an activity entirely.
3. ESG Program: For any proposed change in use of Emergency Shelter Grant funds, the City of Lancaster must send to HUD a description of the revised proposed use of funds and a certification that the proposed use of funds is in accordance with the Consolidated Plan. There are no program requirements for public disclosure of proposed changes; however, all revisions for Emergency Shelter Grant funds will be available to the public. Additionally, the Interagency Council for the Homeless will be consulted for all proposed changes in funds.

C. Performance

1. Examination of, appraisal of, and comment on the City's "Consolidated Annual Performance and Evaluation Report" (CAPER) prior to submission to HUD.

The CAPER is a document produced annually by the City in narrative form and through the automated, "Integrated Disbursement and Information System" (IDIS) which provides a systematic format for reporting to HUD on the use of CDBG, HOME and ESG funds. The CAPER is also used to provide information to the citizens and officials of Lancaster City. In

addition, it is part of HUD's review of CDBG Program grantees and Congress's review of the national CDBG Entitlement Program. Lancaster City must submit its Consolidated Annual Performance and Evaluation Report to HUD each year by the end of September (within 90 days after the close of the CDBG Year each June 30). However, before submitting the CAPER to HUD, availability of the Report for public review and comment must be made known to City residents. Copies must be made accessible to City residents in sufficient time to permit them to review and comment on the Report prior to its submission to HUD.

Accordingly, the City places an invitation for review and comment regarding the latest CDBG Program CAPER each year via paid advertisements in both daily newspapers. The CAPER is advertised as available for review during working hours on specific days in the offices of the City Department of Economic and Community Development, located in the Municipal Building, 120 North Duke Street. A telephone number is also provided to obtain information regarding the City's CAPER.

2. Performance Reviews

The citizen Grant Application Review Panels (which play a role in the Program application review and activity selection process during February and March) will conduct, during September and October, performance reviews of all activities funded through the Consolidated Grant Program during the previous Program Year ending June 30.

3. Public Meetings on Program Performance

The City will conduct annual public meetings in September (for the CDBG Program) and October (for the HOME Program) to review and comment on the performance of Consolidated Grant Program activities which occurred during the previous Program Year (ending June 30).

C. Access to Consolidated Program Information Regarding the Use of Program Funds

At any time during the course of a Consolidated Grant Program Year, every citizen of Lancaster City has access to information related to the projects and activities being financed with Consolidated funds from the current Program Year or from prior Program Years. Such information includes (but is not limited to) project contracts and budgets, financial reports, performance data, and participant information. The availability of Consolidated Grant Program records is consistent with applicable State and local laws regarding privacy and obligations of confidentiality.

D. Comments or Complaints Regarding the Consolidated Grant Program

Comments or complaints from individuals or organizations concerning the Consolidated Grant Program are responded to immediately or as soon as practicable by DECD staff. Inquiries can be made by calling (717) 291-4743 (Voice) or (717) 291-4761 (TDY). Written inquiries should be addressed as follows:

Federal Consolidated Grant Program
Department of Economic and Community Development
Municipal Building
120 North Duke Street, Box 1599
Lancaster, Pennsylvania 17608-1599

The City of Lancaster will consider any written comments or views from citizens, or made orally at the public hearings, in preparing the Consolidated Plan, amendments to the Plan or performance reports. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be attached to the final Consolidated Plan, amendment to the Plan or performance report. Complaints are answered in writing within 15 days of receipt by the City. Written complaints should be addressed as follows:

Director
Department of Economic and Community Development
Municipal Building
120 North Duke Street, Box 1599
Lancaster, Pennsylvania 17608-1599

E. Amendments to the Provision of Information About Consolidated Program Public Hearing for Non-English Speaking Residents

The City will make available translation services for Spanish-speaking residents at the public meeting where views on neighborhood and City-wide needs are expressed, as well as the subsequent public meeting where the Mayor presents the proposed "Consolidated Plan" for discussion. In addition, advertisements which announce "Consolidated Plan" public meetings in English also have Spanish translations. Furthermore, the City can provide translation services for Spanish-speaking residents who come into the Municipal Building to obtain Consolidated Program information.

F. Furnishing Technical Assistance to Groups Regarding the Development of Consolidated Program Proposals Representative of Low- and Moderate-Income Persons

The City's Economic and Community Development staff provides technical assistance to individuals or organizations regarding matters related to the

completion and submission of Consolidated Plan Funding Application Forms to the City. Technical assistance is offered via a cover letter (including the name and phone number of a contact person) which is attached to every Consolidated Project Funding Application Form. In addition, the City serves as a conduit for City-based organizations seeking other Federal or State grants to undertake projects addressing the Economic and Community Development needs of Lancaster City. These funds complement the funds received by the City through the Consolidated Grant Program.

City of Lancaster, Pennsylvania

Community Development Block Grant Program (CDBG)
HOME Investment Partnership Program (HOME)
Emergency Shelter Grant Program (ESG)

UNDERSTANDING LANCASTER'S 'CONSOLIDATED PLAN'

The Federal Government of the United States has many programs operated by various departments through which it redistributes tax money to State, City, and County governments across the country. The purpose of redistributing tax money to these governments is to help them resolve or reduce physical, economic development, and social problems in their jurisdictions.

A primary source of Federal funds for State and local governments (including the City of Lancaster) is the Department of Housing and Urban Development (HUD). Major HUD formula grant Programs include (1) the Community Development Block Grant (CDBG) Program, (2) HOME Investment Partnership (HOME) Program, (3) Emergency Shelter Grant (ESG) Program, and (4) the Housing Opportunities for Persons With AIDS (HOPWA) Program. The City of Lancaster receives funds through the CDBG, HOME, and ESG Programs.

Each of these different HUD Programs previously required the preparation of separate annual plans with distinct citizen participation and other submission requirements. This disjointed planning process has been inefficient and time consuming, and considerable duplication of effort has occurred. To streamline the submission of documents, as well as coordinate planning, application and monitoring processes for its programs, HUD has initiated use of the Consolidated Plan. The Plan will help local governments, such as the City of Lancaster, to focus limited resources on broad community goals and objectives and to ensure that Federally-funded programs function in a coordinated manner.

The Consolidated Plan, a comprehensive planning document, will replace several separate documents now submitted to HUD by the City, including (1) the Comprehensive Housing Affordability Strategy (CHAS), (2) HOME Program Application, (3) Emergency Shelter Grant Program Description, and (4) CDBG Final Statement. The Consolidated Plan will be a document submitted annually to HUD by Lancaster that serves as the City's single planning document and application document for HUD funding under the CDBG, HOME, and ESG Programs. The City's Plan will cover the period from July 1 to June 30.

The three basic goals and related objectives to be addressed in Lancaster's Consolidated Plan (same as under the CDBG, HOME, and ESG Programs) are as follows:

Goal One: Provide Decent Housing

- Retain the affordable housing stock
- Increase the availability of permanent housing affordable to low-income persons
- Assist homeless persons to obtain affordable housing
- Increase supportive housing that includes structural features and services to enable persons with special needs to live in dignity

Goal Two: Provide a Suitable Living Environment

- Improve the safety and livability of neighborhoods
- Increase access to quality facilities and services
- Reduce the isolation of income groups within areas by expanding housing opportunities and revitalizing deteriorating neighborhoods
- Restore and preserve natural and physical features of special value for historic, architectural, or aesthetic reasons
- Conserve energy resources

Goal Three: Expand Economic Opportunities

- Create jobs accessible to low/moderate-income persons
- Provide access to credit for community development that promotes long-term economic and social viability
- Empower low/moderate-income persons living in federally-assisted and public housing to achieve self-sufficiency

Lancaster's five-year Consolidated Plan will create a unified strategy for community development and revitalization and promote partnerships among local institutions, nonprofit organizations, developers, community leaders, citizens and City officials. The process to develop the Plan will enable the City to bring together its needs and resources to develop and coordinate effective housing and community development activities. The five-year Consolidated Plan for Lancaster will contain a strategic plan

which brings the needs and resources identified together into a unified, coordinated planning/ submission document. To develop a unified strategy, the City (with the assistance of citizens and community agencies) will undergo a comprehensive housing and community development self-analysis. As part of this analysis, the City will (1) inventory all of its resources, (2) identify its priority needs, (3) establish its housing and community development objectives, and (4) develop a coordinated strategy to achieve its objectives and resolve priority needs.

The document will also contain a one-year "Action Plan" that lists the activities the City will undertake during the next Program year using funds under the CDBG, HOME, ESG, and other programs for meeting housing and community development objectives. The one-year "Action Plan" will (1) describe the projects to be undertaken, (2) identify the location of each project, and (3) name the organization that will implement each project. A revised "Action Plan" will be developed during each year of the five-year Consolidated Plan period.

Citizen Participation will be a very important consideration in the formation of the City's Consolidated Plan. The City will adopt and implement a detailed "Citizen Participation Plan." The public will have timely access to information relevant to the planning process. The City will make available to the public information regarding (1) the amount of Federal financial assistance that it expects to receive, (2) the range of activities that may be undertaken with the money, and (3) estimates of the number of persons expected to benefit from funded projects. Three public hearings will be held concerning the Consolidated Plan. The hearings will be conducted at three different stages in the Plan development process.

At the first public hearing, the public will have the opportunity to present their views concerning neighborhood and City-wide housing and community development needs which could be addressed by the Consolidated Plan. Also at the first meeting, the City will explain funding application requirements for the upcoming Program Year.

At the second public hearing, citizens will have the opportunity to review the City's proposed Consolidated Plan, including identified housing and community development needs and the proposed use of Federal funds.

Later in the year, at a third public hearing, residents will have the chance to review program performance.

The "Citizen Participation Plan" will provide for technical assistance to citizen groups that request such assistance in developing proposals for funding under the programs covered in the Consolidated Plan. At least 30 days will be provided for public comment on the Plan before its submission to HUD.

Consultation with other organizations will also be an important aspect of Consolidated Plan formulation. The City will confer with public and private agencies that provide assisted housing, health services, and social services during the preparation of the

Plan. Consultation will also occur with the Lancaster City Housing Authority concerning public housing needs and the Authority's planned Comprehensive Grant Program activities. In addition, the City will consult with adjacent units of government, particularly for problems and solutions that may go beyond a single jurisdiction.

Lancaster's Consolidated Plan must be reviewed and approved by HUD within 45 days of submission by the City. The Plan will be submitted to HUD by the City on May 15. The new Program Year will begin on July 1.

LNP MEDIA GROUP, Inc., P.O. Box 1328, Lancaster, PA 17608

Account: 20187561	Ad ID: 4063174
Client Type: LT	Description: PUBLIC MEETING Notice of a Public Re
Name:	Run Dates: 03/06/19 to 03/06/19
Company: CITY OF LANCASTER	Class: 107
Address: ECONOMIC DEV & NEIGHBORHOOD	Orig User: PFIORE
REV	Lines: 60
120 N DUKE ST	Agate Lines: 104
LANCASTER, PA 17602	Inserts: 1

Other Charges:	\$10.00	Gross:	\$307.60
Discount:	\$0.00		
Surcharge:	\$0.00	Paid Amount:	- \$0.00
Credits:	\$0.00		
Bill Depth:	7.472	Amount Due:	\$307.60

PUBLIC MEETING
Notice of a Public Review
and Comment Period for
Lancaster City's
Draft 2018 CONSOLIDATED
ANNUAL PERFORMANCE
AND EVALUATION
REPORT (CAPER)

mobility impaired or have
other special or language
needs, please contact
Susannah Bartlett at the
above information for special
accommodations.
Danene Sorace
Mayor

A Public Meeting will take
place at 12:00 p.m. (noon),
Wednesday, March 21, 2019
in the City Hall Commission
Room at City Hall, 120 North
Duke Street.

Lancaster's draft
Consolidated Annual
Performance and Evaluation
Report (CAPER) describes
the performance of activities
funded in 2018 under the
federal Community
Development Block Grant
(CDBG) and Emergency
Solutions Grant (ESG)
Programs.

A copy of the 2018 CAPER
is available on the City's
website at
<http://cityoflanasterpa.com/resident/plans-reports>
and at City Hall, 120 North
Duke Street, Lancaster, PA
17602.

The City will accept citizen
comments regarding the
CAPER for 15 days (from
March 6 to March 21).
Persons interested in com-
menting on the CAPER
should contact the
Department of Economic
Development and
Neighborhood Revitalization,
Monday – Friday between
the hours of 8:30 a.m. and
5:00 p.m. at the following:

Address: 120 North Duke
Street (PO Box 1599),
Lancaster, PA 17608-1599
Phone: (717) 291 – 4743
Email:
subartlett@cityoflanasterpa.com

If you are a person who is

Confidentiality Notice: This fax is intended for the use of the individual or entity to which it is addressed and may contain information or otherwise protected from disclosure. If you are not the intended recipient, you may not use, copy or disclose the message of any information have received this communication in error, please notify the sender by telephone and return the fax by mail.

Fax Opt-Out Notice: As required the Telephone Consumer Protection Act of 1991, if you do not wish to receive future unsolicited fax advertisements send your opt-out request to us by email at class@lnpnews.com, by fax at (717)291-8728, or by telephone at (717)291-8711. In order for you provide the fax number(s) at which you no longer wish to receive fax advertisements from us. As required by law we will comply within the time by the FCC.

PUBLIC MEETING

(3/2 /201)

For Lancaster's Proposed, Federally-Funded,

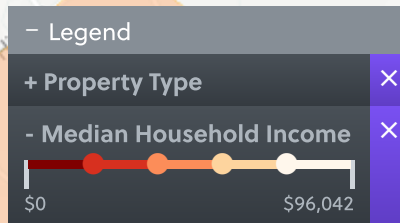
COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM EMERGENCY SOLUTIONS GRANT PROGRAM

2018 CAPER

(Please Print)

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

Income in the Past 12 Months
(in 2017 inflation-adjusted \$)



2013-17 ACS 5-Year Est.

S1901: INCOME IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS) for Lancaster City, PA

Total	Households		Families		Married-couple		Nonfamily	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
	21,886	+/-519	12,532	+/-391	6,982	+/-446	9,354	+/-612
Less than \$10,000	11.2%	+/-1.5	9.3%	+/-2.0	2.9%	+/-1.4	15.7%	+/-2.6
\$10,000 to \$14,999	7.9%	+/-1.4	5.5%	+/-1.4	2.1%	+/-1.1	11.6%	+/-2.4
\$15,000 to \$24,999	13.1%	+/-1.4	12.8%	+/-2.2	7.9%	+/-2.0	16.0%	+/-2.3
\$25,000 to \$34,999	11.1%	+/-1.2	10.8%	+/-1.7	9.0%	+/-1.7	12.5%	+/-2.2
\$35,000 to \$49,999	16.4%	+/-1.6	16.5%	+/-2.2	17.3%	+/-3.0	15.6%	+/-2.2
\$50,000 to \$74,999	19.0%	+/-1.7	20.7%	+/-2.6	24.6%	+/-3.3	13.9%	+/-2.2
\$75,000 to \$99,999	10.3%	+/-1.6	10.9%	+/-2.0	14.7%	+/-3.2	7.5%	+/-1.9
\$100,000 to \$149,999	7.5%	+/-1.0	9.4%	+/-1.3	14.9%	+/-2.3	4.9%	+/-1.5
\$150,000 to \$199,999	2.2%	+/-0.7	2.6%	+/-0.9	4.0%	+/-1.5	1.6%	+/-0.7
\$200,000 or more	1.2%	+/-0.4	1.6%	+/-0.6	2.6%	+/-1.1	0.6%	+/-0.5
Median income (dollars)	40,805	+/-1,511	44,805	+/-2,515	59,067	+/-3,752	31,256	+/-2,025
Mean income (dollars)	51,361	+/-1,860	56,228	+/-2,661	N	N	42,038	+/-3,291

2013-2017 American Community Survey 5-Year Estimates

Note: Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Technical Documentation section. Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section. Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities, and towns and estimates of housing units for states and counties.

Lancaster City Limited English Proficiency Analysis and Language Access Plan

Introduction

Under Title VI of the Civil Rights Act of 1964, LEP persons are entitled to language assistance with respect to services/benefits from or interactions with recipients of federal financial assistance. Per HUD guidance, agencies should provide reasonable accommodations for languages that consist of more than 5% of the population.

The purpose of this Language Assistance Plan (LAP) is Lancaster City describe a dedication by Lancaster City to (1) provide Limited English Proficiency (LEP) persons with a reasonable set of tools to access programs and services offered by Lancaster City and (2) prevent discrimination based on a persons' national origin. The LAP also serves as a resource for Lancaster City staff, clearly explaining procedures for sufficient assistance for LEP persons.

LEP refers to a person's limited ability to read, write, speak, or understand English. Individuals who are LEP are not a protected class under the Fair Housing Act (the Act), However, the Act prohibits providers from using LEP selectively based on a protected class, as a pretext for discrimination because of a protected class or in a way that causes an unjustified discriminatory effect.

To provide access for LEP persons to programs and activities, federal recipients are advised to:

1. Conduct the Four-Factor Analysis (see *Appendix B: Four Factor Analysis*)
2. Develop a Language Access Plan (LAP)
3. Implement the Language Access Plan to provide appropriate language assistance

Language Access Coordinator

The Mayor of Lancaster City shall appoint a Language Access Coordinator responsible for ensuring equitable language access to Lancaster City Federally funded programs administered by Lancaster City for languages that meet the Federally set threshold (see *Appendix B: Four Factor Analysis* for more information).

The Language Access Coordinator may delegate duties but retains ultimate responsibility for oversight, performance, and implementation of the LAP.

Lancaster City's Language Access Coordinator will be responsible for:

- Consultation with local service providers that work closely with Lancaster City's LEP population. These providers are selected based on the discretion of the Language Access Coordinator. These providers may include the Lancaster County Refugee and Immigrant Coalition (LCRIC), Church World Services, Lancaster Human Relations Commission and the Spanish American Civic Association (CASA).
- Consultation with Lancaster City Department representatives involved and/or knowledgeable about Federally funded Lancaster City services.
- An annual update of the Four Factor analysis (see *Appendix B: Four Factor Analysis*).
- Determining whether Lancaster City is making a good faith effort to
 - provide LEP persons with a reasonable set of tools to access programs and services offered by Lancaster City

- prevent discrimination based on a persons' national origin.
- Informing Lancaster City staff of the procedures for sufficient assistance for LEP persons.
- Informing the Lancaster City Mayor on the state of access of Lancaster City services to its LEP populations
- Recommending changes and shifts in services provision standards and processes.
- Maintaining proper signage.

Please see *Appendix D: Further Language Access Strategies* for supplemental information on how the above may be accomplished by the Language Access Coordinator.

Public Announcement and Signage

A sign will be visibly posted in the front lobby and the Language Access Coordinator's office informing persons of their right to an interpreter.

The City will include a statement in any public announcements pertaining to any federally funded program that the City will make a good faith effort to provide interpretative services to any LEP person that falls within a language category that meets the Federally set threshold upon request. Currently, Spanish is the only language that meets the Federally designated threshold of 5% (please see Appendix B: Four Factor Analysis).

Oral Interpretation

Currently, Spanish is the only language that meets the Federally designated threshold of 5% (please see Appendix B: Four Factor Analysis). Lancaster City will make a good faith effort to provide the following interpretation services for Spanish clients who have identified themselves as LEP and request services.

- The City employs bilingual, Spanish speaking staff in several key positions to aid in the provision of oral interpretation (including the Language Access Coordinator position). If a bilingual, Spanish speaking staff member is available to translate, they can provide oral interpretation to an LEP individual.
- Local volunteers have been identified to provide oral translation upon request at public meetings and during conversations with LEP residents. These services may extend to LEP individuals who speak a language other than Spanish.
- Staff will communicate with hearing impaired and/or deaf residents in writing unless prior arrangements have been made to secure the services of a sign language interpreter.
- If after a client self-identifies as LEP and chooses not to use interpretation services offered to them, they may fill out and sign the Interpretation Declination Form (Appendix C).

Please see *Appendix D: Further Language Access Strategies* for supplemental information on how the above may be accomplished by the Language Access Coordinator.

Written Translation

Currently, internet sites can be used to translate some written materials. Many of the common forms used in the implementation of the HUD funded programs are available in multiple languages on the HUD and DOL websites. Additionally, the City will ensure that any contract for language assistance services will specify responsibilities, assign liability, set pay rates, and lay out the ways in which

difficulties or disputes are resolved. Lancaster City's website also includes an automatic translation into Spanish. Any documents or communications that are received by staff that are not in English shall be forwarded to the Language Access Coordinator for processing.

Please see *Appendix D: Further Language Access Strategies* for supplemental information on how the above may be accomplished by the Language Access Coordinator.

DRAFT

APPENDIX A – Definitions

Interactive Voice Response (IVR) is an automated system that enabled callers to obtain and provide information over the telephone in English and other languages.

Interpretation is assisting with oral or spoken communication between speakers of two different languages.

Language Access Plan is the guiding document that ensures access to programs is provided to individuals that may have limited English proficiency and that the resources to do so are available.

Limited English Proficient (LEP) persons are defined as persons who do not speak English as their primary language and who have limited ability to read, write, speak or understand English. Lancaster City will not identify anyone as LEP; the beneficiaries of the services and activities must identify themselves as LEP (Federal Register Vol. 72, No. 13, January 22, 2007).

Major LEP Language Groups are the populations of persons with LEP in Lancaster County that represent at least 5% or 1,000 individuals in the area, whoever is less.

Qualified Interpreters have demonstrated proficiency in English and the second language; demonstrated knowledge in both languages of relevant specialized terms or concepts; have documentation of completion of training on the skills and ethics of interpretation, and have awareness of relevant cultural issues.

Safe Harbor is the threshold that permits programs to decide when a written translation is required to comply with Title VI of the Civil Rights Act of 1964. The following are the thresholds:

- Written translations of Agency vital documents will be provided for each eligible language group that constitutes at least 5% or 1,000 individuals, whoever is less, of the population of persons eligible to be served or encountered by programs in the service area.
- If there are fewer than 50 persons in a language group, the recipient does not translate vital written materials, but provides written notice in the primary language of the LEP group of their right to oral interpretation for those written materials, free of cost.

Title VI of the Civil Rights Act of 1964 and its implementing regulations at 45 CFR Part 80 is the law that protects individuals from discrimination based on their race, color, or national origin under any program or activity that receives Federal financial assistance.

Translation is taking documents written in one language and writing or reading them in another language.

Vital documents are documents, papers or electronics, that contain information that is critical for accessing the City's services and/or benefits; letters or notice that require a response from the customer; and documents that inform customers of free language assistance.

APPENDIX B: FOUR FACTOR ANALYSIS

- (1) The number and proportion of LEP persons served or encountered in the eligible service area population?

For Lancaster City, 12.3% (+/- 1.3%) of Lancaster City's population (i.e. 6,800 individuals) speak Spanish at home and speak English less than "very well" (2013 – 2017 American Community Survey 5-Year Estimate). This exceeds the United States average of 5% (or 16,357,882) of LEP individuals who speak Spanish (2013 – 2017 American community Survey 5-Year Estimate).

This is the only LEP population that extends over the threshold of 5%. However, the City recognizes other LEP populations (due in part to high rates of refugee and immigrant resettlement to Lancaster from around the world), and will work to reasonably extend the services of this access plan to other languages as needed.

LANGUAGE SPOKEN AT HOME IN LANCASTER CITY, PENNSYLVANIA 2012 - 2016				
Category	Population Estimate	Margin of Error	Percent of Population (X)	Margin of Error (X)
Population 5 years and over	54,990	+/-419		
English only	35,060	+/-988	63.8%	+/-1.8
Language other than English	19,930	+/-982	36.2%	+/-1.8
Speak English less than "very well"	8,507	+/-816	15.5%	+/-1.5
Spanish	16,457	+/-993	29.9%	+/-1.8
Speak English less than "very well"	6,571	+/-756	11.9%	+/-1.4
Other Indo-European languages	1,585	+/-502	2.9%	+/-0.9
Speak English less than "very well"	731	+/-342	1.3%	+/-0.6
Asian and Pacific Islander languages	1,316	+/-374	2.4%	+/-0.7
Speak English less than "very well"	794	+/-231	1.4%	+/-0.4
Other languages	572	+/-230	1.0%	+/-0.4
Speak English less than "very well"	411	+/-176	0.7%	+/-0.3

Source: U.S. Census Bureau, 2012 – 2016 American Community Survey 5-Year Estimate

LANGUAGE SPOKEN AT HOME IN LANCASTER CITY, PENNSYLVANIA 2013 - 2017				
Category	Population Estimate	Margin of Error	Percent of Population (X)	Margin of Error (X)
Population 5 years and over	55,316	+/-392		
English only	34,840	+/-1,129	63.0%	+/-1.9
Language other than English	20,475	+/-1,048	37.0%	+/-1.9
Speak English less than "very well"	8,950	+/-796	16.2%	+/-1.4
Spanish	16,679	+/-972	30.2%	+/-1.8
Speak English less than "very well"	6,800	+/-710	12.3%	+/-1.3
Other Indo-European languages	1,710	+/-506	3.1%	+/-0.9

Speak English less than "very well"	836	+/-365	1.5%	+/-0.7
Asian and Pacific Islander languages	1,363	+/-346	2.5%	+/-0.6
Speak English less than "very well"	867	+/-248	1.6%	+/-0.4
Other languages	726	+/-211	1.3%	+/-0.4
Speak English less than "very well"	447	+/-150	0.8%	+/-0.3

Source: U.S. Census Bureau, 2013 – 2017 American Community Survey 5-Year Estimate

Below please find a summary of Interviews with Department Heads and Key Staff

Interview Questions:

1. What is the need for language access services and policies?
2. What language access services and policies currently exist (formally or informally) throughout Lancaster City government?
3. How do the current services and policies meet the need?

Who was interviewed:

- Bureau Chief of Human Resources: 3/28/18
- Housing & Economic Development Administrator: 3/12/18 & 4/3/18
- Director of the Housing Equality and Equity Institute (LHOP): 3/12/18 & 4/3/18
- City Council President: 4/10/18
- City Clerk: 4/12/18
- 1st Fire Battalion Chief: 4/16/18
- Police Chief: 4/17/18
- Director of EDNR: 4/19/18
- 2nd Fire Battalion Chief: 4/19/18
- City LOOP Director: 4/25/18
- Director of DPW: 06/28/18
- City Hall Receptionist: 06/28/18

Interview Themes:

- The day-to-day need of translation services is felt across all departments.
- If a constituent requires translation services, they are much more likely to come in-person to City Hall for City services (as opposed to use the phone) .
- Bi-lingual staff located on the first floor have become key personnel in the provision of language access services in City Hall.
- DPW, Fire (7 firefighters across 3 shifts) and Police (15 – 20 officers out of 136) will most likely have at least one Spanish speaking employee during any given shift.
- Although staff who provide translation services do well, these duties are not explicitly in their job descriptions.
- Written translation of official documents into Spanish takes time (average 1 ½ hours per document).
- There is a need for an official translation of complicated legal documents
- Spanish is the most apparent and pressing need, however there also exists a need for Bhutanese, Indian, Pakistani, ASL (lower), Nepalese, Vietnamese, Russian and Eastern European, as well as several different dialects of Spanish.

(2) The frequency with which LEP persons encounters a federally funded activity?

Due to the high proportion of Spanish speaking persons that speak English less than “very well” within Lancaster city, Pennsylvania (the City’s service area), there is a high likelihood of interaction with LEP persons while providing direct service. Additionally, in 2016 Lancaster City reported 58% of their HUD funded program participants (who received a direct benefit) were of Hispanic ethnicity. An individual’s race and ethnicity does not reflect their language preference or ability. However, it is likely that Lancaster’s Hispanic American population includes a large percent of our city’s Spanish speakers as well as our city’s Spanish speakers who speak English less than “very well.” Therefore, a high percentage of services provided to Lancaster’s Hispanic community may demonstrate a language access need.

(3) The nature and importance of all federally funded activities or services provided by the activity:

HUD funded programs administered by Lancaster City are directed toward accomplishing:

- Decent, affordable rental and owner-occupied housing for low- and very low-income persons throughout the City;
- Upgrade public infrastructure and facilities in areas of the city principally occupied by persons with low- and very low-incomes;
- Provide human services for low- and very low-income individuals and families
- Improve accessibility for person with disabilities; and
- 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.

These services are of high importance to many households. Due to this and to a high percent of HUD funded program participants being of Hispanic ethnicity, it is imperative that Lancaster City develop and sustain an effective Language Access Plan.

(4) Resources available and costs to recipients:

Please see main for a description of provided resources.

APPENDIX C – INTERPRETATION DECLINATION FORM

I _____, understand that language interpretation services will be made available to me by Lancaster City for information and questions on programs available through Lancaster City **at no cost to me**.

I choose **not to use the free language interpretation services** offered to me and have decided to use the interpretation services from _____.

Signature: _____

Date: _____

DRAFT

APPENDIX D – FURTHER LANGUAGE ACCESS STRATEGIES

1. after completing the four-factor analysis and deciding what language assistance services are appropriate, a recipient may develop a LAP or Implementation Plan to address identified needs of the LEP populations it serves. Some elements that may be helpful in designing an LAP include: (1) Identifying LEP persons who need language assistance and the specific language assistance that is needed; (2) identifying ways in which language assistance will be provided; (3) providing effective outreach to the LEP community; (4) training staff; (5) translating informational materials in identified language(s) that detail services and activities provided to beneficiaries (e.g., model leases, tenants' rights and responsibilities brochures, fair housing materials, first-time homebuyer guide); (6) providing appropriately translated notices to LEP persons (e.g., eviction notices, security information, emergency plans); (7) providing interpreters for large, medium, small, and one-on-one meetings; (8) developing community resources, partnerships, and other relationships to help with the provision of LEP services; and (9) making provisions for monitoring and updating the LAP.
2. The City's Equitable Access Team is composed of internal City staff with representation from all City departments, the Human Relations Commission and the City Council. This body will help determine the severity of the identified gap, the resources available to fill the gap and the appropriate action the City should take. The City's Equitable Access Team will then report their findings to the Mayor for a decision on action to be taken.
3. Currently, different departments have separate subscriptions to different translations services. EDNR has a subscription, Fire and Police benefit from the County's Dispatch Center (who uses language line). The Language Access Coordinator may wish to investigate a Citywide subscription to translation services.
4. City Police and Fire have low-tech In-the-field translation tools such as emergency visual language translators
5. The City has developed pathways to hire more Bi-lingual Staff such as the Fire Department who gives additional points on the civil service certification to bi-lingual officers as an incentive.
 - The Language Access Coordinator may choose to investigate partnership with WLCH (SACA's Spanish radio station) for live translation/commentary, Church World Services for cultural awareness trainings and translation services, and Lancaster City School District and First Responders (EMS) who exhibits a similar translation service need

APPENDIX E – HUD GUIDANCE ON LEP SERVICE PROVISION – Question and Answers

Who are limited English proficient (LEP) persons? For persons who, as a result of national origin, do not speak English as their primary language and who have a limited ability to speak, read, write, or understand. For purposes of Title VI and the LEP Guidance, persons may be entitled to language assistance with respect to a particular service, benefit, or encounter.

What is Title VI and how does it relate to providing meaningful access to LEP persons? Title VI of the Civil Rights Act of 1964 is the federal law that protects individuals from discrimination on the basis of their race, color, or national origin in programs that receive federal financial assistance. In certain situations, failure to ensure that persons who are LEP can effectively participate in, or benefit from, federally assisted programs may violate Title VI's prohibition against national origin discrimination.

What do Executive Order (EO) 13166 and the Guidance require? EO 13166, signed on August 11, 2000, directs all federal agencies, including the Department of Housing and Urban Development (HUD), to work to ensure that programs receiving federal financial assistance provide meaningful access to LEP persons. Pursuant to EO 13166, the meaningful access requirement of the Title VI regulations and the four-factor analysis set forth in the Department of Justice (DOJ) LEP Guidance apply to the programs and activities of federal agencies, including HUD. In addition, EO 13166 requires federal agencies to issue LEP Guidance to assist their federally assisted recipients in providing such meaningful access to their programs. This Guidance must be consistent with the DOJ Guidance. Each federal agency is required to specifically tailor the general standards established in DOJ's Guidance to its federally assisted recipients. On December 19, 2003, HUD published such proposed Guidance. IV.

Who must comply with the Title VI LEP obligations? All programs and operations of entities that receive financial assistance from the federal government, including but not limited to state agencies, local agencies and for-profit and non-profit entities, must comply with the Title VI requirements. A listing of most, but not necessarily all, HUD programs that are federally assisted may be found at the "List of Federally Assisted Programs" published in the Federal Register on November 24, 2004 (69 FR 68700). Sub-recipients must also comply (i.e., when federal funds are passed through a recipient to a sub-recipient). As an example, Federal Housing Administration (FHA) insurance is not considered federal financial assistance, and participants in that program are not required to comply with Title VI's LEP obligations, unless they receive federal financial assistance as well. [24 CFR 1.2 (e)].

Does a person's citizenship and immigration status determine the applicability of the Title VI LEP obligations? United States citizenship does not determine whether a person is LEP. It is possible for a person who is a United States citizen to be LEP. It is also possible for a person who is not a United States citizen to be fluent in the English language. Title VI is interpreted to apply to citizens, documented non-citizens, and undocumented non-citizens. Some HUD programs require recipients to document citizenship or eligible immigrant status of beneficiaries; other programs do not. Title VI LEP obligations apply to every beneficiary who meets the program requirements, regardless of the beneficiary's citizenship status.

What is expected of recipients under the Guidance? Federally assisted recipients are required to make reasonable efforts to provide language assistance to ensure meaningful access for LEP persons to the recipient's programs and activities. To do this, the recipient should: (1) Conduct the four-factor

analysis; (2) develop a Language Access Plan (LAP); and (3) provide appropriate language assistance. The actions that the recipient may be expected to take to meet its LEP obligations depend upon the results of the four-factor analysis including the services the recipient offers, the community the recipient serves, the resources the recipient possesses, and the costs of various language service options. All organizations would ensure nondiscrimination by taking reasonable steps to ensure meaningful access for persons who are LEP. HUD recognizes that some projects' budgets and resources are constrained by contracts and agreements with HUD. These constraints may impose a material burden upon the projects. Where a HUD recipient can demonstrate such a material burden, HUD views this as a critical item in the consideration of costs in the four-factor analysis. However, refusing to serve LEP persons or not adequately serving or delaying services to LEP persons would violate Title VI. The agency may, for example, have a contract with another organization to supply an interpreter when needed; use a telephone service line interpreter; or, if it would not impose an undue burden, or delay or deny meaningful access to the client, the agency may seek the assistance of another agency in the same community with bilingual staff to help provide oral interpretation service.

What is the four-factor analysis? Recipients are required to take reasonable steps to ensure meaningful access to LEP persons. This "reasonableness" standard is intended to be flexible and fact-dependent. It is also intended to balance the need to ensure meaningful access by LEP persons to critical services while not imposing undue financial burdens on small businesses, small local governments, or small nonprofit organizations. As a starting point, a recipient may conduct an individualized assessment that balances the following four factors:

- The number or proportion of LEP persons served or encountered in the eligible service population ("served or encountered" includes those persons who would be served or encountered by the recipient if the persons received adequate education and outreach and the recipient provided sufficient language services);
- The frequency with which LEP persons come into contact with the program;
- The nature and importance of the program, activity, or service provided by the program; and
- The resources available and costs to the recipient. Examples of applying the four-factor analysis to HUD-specific programs are located in Appendix A of this Guidance.

What are examples of language assistance? Language assistance that a recipient might provide to LEP persons includes, but is not limited to:

- Oral interpretation services;
- Bilingual staff;
- Telephone service lines interpreter;
- Written translation services;
- Notices to staff and recipients of the availability of LEP services; or
- Referrals to community liaisons proficient in the language of LEP persons.

What is a Language Access Plan (LAP) and what are the elements of an effective LAP? After completing the four-factor analysis and deciding what language assistance services are appropriate, a recipient may develop an implementation plan or LAP to address identified needs of the LEP populations it serves. Some elements that may be helpful in designing a LAP include:

- Identifying LEP persons who need language assistance and the specific language assistance that is needed;
- Identifying the points and types of contact the agency and staff may have with LEP persons;
- Identifying ways in which language assistance will be provided;
- Outreaching effectively to the LEP community;
- Training staff;
- Determining which documents and informational materials are vital;
- Translating informational materials in identified language(s) that detail services and activities provided to beneficiaries (e.g., model leases, tenants' rights and responsibilities brochures, fair housing materials, first-time homebuyer guide);
- Providing appropriately translated notices to LEP persons (e.g., eviction notices, security information, emergency plans);
- Providing interpreters for large, medium, small, and one-on-one meetings;
- Developing community resources, partnerships, and other relationships to help with the provision of language services; and
- Making provisions for monitoring and updating the LAP, including seeking input from beneficiaries and the community on how it is working and on what other actions should be taken.

What is a vital document? A vital document is any document that is critical for ensuring meaningful access to the recipients' major activities and programs by beneficiaries generally and LEP persons specifically. Whether or not a document (or the information it solicits) is "vital" may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner. For instance, applications for auxiliary activities, such as certain recreational programs in public housing, would not generally be considered a vital document, whereas applications for housing would be considered vital. However, if the major purpose for funding the recipient were its recreational program, documents related to those programs would be considered vital. Where appropriate, recipients are encouraged to create a plan for consistently determining, over time and across its various activities, what documents are "vital" to the meaningful access of the LEP populations they serve.

How may a recipient determine the language service needs of a beneficiary? Recipients should elicit language service needs from all prospective beneficiaries (regardless of the prospective beneficiary's race or national origin). If the prospective beneficiary's response indicates a need for language assistance, the recipient may want to give applicants or prospective beneficiaries a language identification card (or "I speak" card). Language identification cards invite LEP persons to identify their own language needs. Such cards, for instance, might say "I speak Spanish" in both Spanish and English, "I speak Vietnamese" in both Vietnamese and English, etc. To reduce costs of compliance, the federal government has made a set of these cards available on the Internet. The Census Bureau "I speak" card can be found and downloaded at <http://www.usdoj.gov/crt/cor/13166.htm>. The State of Ohio Office of Criminal Justice Services, the National Association of Judiciary Interpreters and Translators, the Summit County Sheriff's Office, and the American Translators Association have made their language identification card available at http://www.lep.gov/ocjs_languagecard.pdf.

How may a recipient's limited resources be supplemented to provide the necessary LEP services? A recipient should be resourceful in providing language assistance as long as quality and accuracy of language services are not compromised. The recipient itself need not provide the assistance, but may decide to partner with other organizations to provide the services. In addition, local community resources may be used if they can ensure that language services are competently provided. In the case of oral interpretation, for example, demonstrating competency requires more than self-identification as bilingual. Some bilingual persons may be able to communicate effectively in a different language when communicating information directly in that language, but may not be competent to interpret between English and that language. In addition, the skill of translating is very different than the skill of interpreting and a person who is a competent interpreter may not be a competent translator. To ensure the quality of written translations and oral interpretations, HUD encourages recipients to use members of professional organizations. Examples of such organizations are: National organizations, including American Translators Association (written translations), National Association of Judicial Interpreters and Translators, and International Organization of Conference Interpreters (oral interpretation); state organizations, including Colorado Association of Professional Interpreters and Florida Chapter of the American Translators Association; and local legal organizations such as Bay Area Court Interpreters. While HUD recommends using the list posted on <http://www.LEP.gov>, its limitations must be recognized. Use of the list is encouraged, but not required or endorsed by HUD. It does not come with a presumption of compliance. There are many other qualified interpretation and translation providers, including in the private sector.

May recipients rely upon family members or friends of the LEP person as interpreters? Generally, recipients should not rely on family members, friends of the LEP person, or other informal interpreters. In many circumstances, family members (especially children) or friends may not be competent to provide quality and accurate interpretations. Therefore, such language assistance may not result in an LEP person obtaining meaningful access to the recipients' programs and activities. However, when LEP persons choose not to utilize the free language assistance services expressly offered to them by the recipient but rather choose to rely upon an interpreter of their own choosing (whether a professional interpreter, family member, or friend), LEP persons should be permitted to do so, at their own expense. Recipients may consult HUD LEP Guidance for more specific information on the use of family members or friends as interpreters. While HUD guidance does not preclude use of friends or family as interpreters in every instance, HUD recommends that the recipient use caution when such services are provided.

Are leases, rental agreements and other housing documents of a legal nature enforceable in U.S. courts when they are in languages other than English? Generally, the English language document prevails. The HUD translated documents may carry the disclaimer, "This document is a translation of a HUD-issued legal document. HUD provides this translation to you merely as a convenience to assist in your understanding of your rights and obligations. The English language version of this document is the official, legal, controlling document. This translated document is not an official document." Where both the landlord and tenant contracts are in languages other than English, state contract law governs the leases and rental agreements. HUD does not interpret state contract law. Therefore, questions regarding the enforceability of housing documents of a legal nature that are in languages other than English should be referred to a lawyer well-versed in contract law of the appropriate state or locality.

Are EO 13166 and HUD LEP Guidance enforceable by individuals in a court of law? Neither EO 13166 nor HUD LEP Guidance grants an individual the right to proceed to court alleging violations of EO 13166 or HUD LEP Guidance. In addition, current Title VI case law only permits a private right of action for intentional discrimination and not for action based on the discriminatory effects of a recipient's practices. However, individuals may file administrative complaints with HUD alleging violations of Title VI because the HUD recipient failed to take reasonable steps to provide meaningful access to LEP persons. The local HUD office will intake the complaint, in writing, by date and time, detailing the complainant's allegation as to how the HUD recipient failed to provide meaningful access to LEP persons. HUD will determine jurisdiction and follow up with an investigation of the complaint.

Who enforces Title VI as it relates to discrimination against LEP persons? Most federal agencies have an office that is responsible for enforcing Title VI of the Civil Rights Act of 1964. To the extent that a recipient's actions violate Title VI obligations, then such federal agencies will take the necessary corrective steps. The Secretary of HUD has designated the Office of Fair Housing and Equal Opportunity (FHEO) to take the lead in coordinating and implementing EO 13166 for HUD, but each program office is responsible for its recipients' compliance with the civil-rights related program requirements (CRRPRs) under Title VI.

How does a person file a complaint if he/she believes a HUD recipient is not meeting its Title VI LEP obligations? If a person believes that a HUD federally assisted recipient is not taking reasonable steps to ensure meaningful access to LEP persons, that individual may file a complaint with HUD's local Office of FHEO. For contact information of the local HUD office, go to <http://www.hud.gov> or call the housing discrimination toll free hotline at 800-669-9777 (voice) or 800-927-9275 (TTY).

What will HUD do with a complaint alleging noncompliance with Title VI obligations? HUD's Office of FHEO will conduct an investigation or compliance review whenever it receives a complaint, report, or other information that alleges or indicates possible noncompliance with Title VI obligations by one of HUD's recipients. If HUD's investigation or review results in a finding of compliance, HUD will inform the recipient in writing of its determination. If an investigation or review results in a finding of noncompliance, HUD also will inform the recipient in writing of its finding and identify steps that the recipient must take to correct the noncompliance. In a case of noncompliance, HUD will first attempt to secure voluntary compliance through informal means. If the matter cannot be resolved informally, HUD may then secure compliance by:

- (1) Terminating the financial assistance of the recipient only after the recipient has been given an opportunity for an administrative hearing; and/or
- (2) (2) referring the matter to DOJ for enforcement proceedings.

How will HUD evaluate evidence in the investigation of a complaint alleging noncompliance with Title VI obligations? Title VI is the enforceable statute by which HUD investigates complaints alleging a recipient's failure to take reasonable steps to ensure meaningful access to LEP persons. In evaluating the evidence in such complaints, HUD will consider the extent to which the recipient followed the LEP Guidance or otherwise demonstrated its efforts to serve LEP persons. HUD's review of the evidence will include, but may not be limited to, application of the four-factor analysis identified in HUD LEP Guidance. The four-factor analysis provides HUD a framework by which it may look at all the programs and services that the recipient provides to persons who are LEP to ensure meaningful access while not imposing undue burdens on recipients.

What is a “safe harbor?” A “safe harbor,” in the context of this guidance, means that the recipient has undertaken efforts to comply with respect to the needed translation of vital written materials. If a recipient conducts the four- factor analysis, determines that translated documents are needed by LEP applicants or beneficiaries, adopts an LAP that specifies the translation of vital materials, and makes the necessary translations, then the recipient provides strong evidence, in its records or in reports to the agency providing federal financial assistance, that it has made reasonable efforts to provide written language assistance. XXI. What “safe harbors” may recipients follow to ensure they have no compliance finding with Title VI LEP obligations? HUD has adopted a “safe harbor” for translation of written materials. The Guidance identifies actions that will be considered strong evidence of compliance with Title VI obligations. Failure to provide written translations under these cited circumstances does not mean that the recipient is in noncompliance. Rather, the “safe harbors” provide a starting point for recipients to consider:

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

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

When HUD conducts a review or investigation, it will look at the total services the recipient provides, rather than a few isolated instances.

Is the recipient expected to provide any language assistance to persons in a language group when fewer than 5 percent of the eligible population and fewer than 50 in number are members of the language group? HUD recommends that recipients use the four-factor analysis to determine whether to provide these persons with oral interpretation of vital documents if requested.

Are there “safe harbors” provided for oral interpretation services? There are no “safe harbors” for oral interpretation services. Recipients should use the four-factor analysis to determine whether they should provide reasonable, timely, oral language assistance free of charge to any beneficiary that is LEP (depending on the circumstances, reasonable oral language assistance might be an in-person interpreter or telephone interpreter line). XXIV. Is there a continued commitment by the Executive Branch to EO 13166? There has been no change to the EO 13166. The President and Secretary of HUD are fully committed to ensuring that LEP persons have meaningful access to federally conducted programs and activities.

Did the Supreme Court address and reject the LEP obligation under Title VI in *Alexander v. Sandoval* [121 S. Ct. 1511 (2001)]? The Supreme Court did not reject the LEP obligations of Title VI in its *Sandoval* ruling. In *Sandoval*, 121 S. Ct. 1511 (2001), the Supreme Court held that there is no right of action for private parties to enforce the federal agencies’ disparate impact regulations under Title VI. It ruled that, even if the Alabama Department of Public Safety’s policy of administering driver’s license examinations only in English violates Title VI regulations, a private party may not bring a lawsuit under those regulations to enjoin Alabama’s policy. *Sandoval* did not invalidate Title VI or the Title VI disparate impact regulations, and federal agencies’ (versus private parties) obligations to enforce Title VI. Therefore, Title VI regulations remain in effect. Because the legal basis for the Guidance required under EO 13166 is Title VI and, in HUD’s case, the civil rights- related program requirements (CRRPR), dealing with differential treatment, and since *Sandoval* did not invalidate either, the EO remains in effect.

What are the obligations of HUD recipients if they operate in jurisdictions in which English has been declared the official language? In a jurisdiction where English has been declared the official language, a HUD recipient is still subject to federal nondiscrimination requirements, including Title VI requirements as they relate to LEP persons.

Where can I find more information on LEP? You should review HUD’s LEP Guidance. Additional information may also be obtained through the federal-wide LEP Web site at <http://www.lep.gov> and HUD’s Web site, <http://www.hud.gov/offices/fheo/promotingfh/lep.cfm>. HUD also intends to issue a Guidebook to help HUD recipients develop an LAP. A HUD-funded recipient who has questions regarding providing meaningful access to LEP persons may contact Pamela D. Walsh, Director, Program Standards Division, HUD/FHEO, at (202) 708–2288 or 800–877–8339 (TTY). You may also email your question to limitedenglishproficiency@hud.gov.