

# **City of Lancaster, Pennsylvania**

Department of Economic Development and Neighborhood Revitalization

**Fiscal Year 2020**

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# **ANNUAL ACTION PLAN**

For the Period  
January 1, 2020 – December 31, 2020

For Activities Funded by the Following Federal Program:

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

**Danene Sorace, Mayor**



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## Executive Summary

### Introduction

The City of Lancaster will receive a CDBG entitlement amount of \$1,708,182 and an ESG entitlement amount of \$145,929 for the 2020 fiscal year.

### Summarize the objectives and outcomes identified in the Plan

CDBG, ESG and HOME funds (as allocated to the developing City/County Consortium) will be directed toward accomplishing the following primary objectives during 2020:

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

### Evaluation of past performance

The City's 2016, 2017, 2018 and 2019 Consolidated Annual Performance Evaluation Reports (CAPERs) were used as an evaluation of past performance to help lead the grantee to choose its goals or projects for the 2020 Fiscal Year.

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

### Summary of Citizen Participation Process and consultation process

A legal advertisement was placed in the Lancaster Newspaper on Friday, April 16, 2020 announcing the 30-day public comment period. A public meeting and Special City Council Meeting will be announced in a separate legal advertisement in the coming days. The draft plan was placed on the City's website.

### Summary of public comments

TBD

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

TBD

## Lead & Responsible Agencies

### Agency/entity responsible for preparing/administering the Consolidated Plan

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

<b>Agency Role</b>	<b>Name</b>	<b>Department/Agency</b>
CDBG Administrator	LANCASTER	Community Planning and Economic Development
ESG Administrator		

**Table 1 – Responsible Agencies**

### Consolidated Plan Public Contact Information

Susannah Thorsen, Community Development Administrator, [SThorsen@cityoflanasterpa.com](mailto:SThorsen@cityoflanasterpa.com)

### 3. Agencies, groups, organizations who participated

1	<b>Agency/Group/Organization</b>	Redevelopment Authority of the County of Lancaster
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This plan was jointly submitted with the Lancaster County Redevelopment Authority. Policies and strategies were discussed and created collaboratively.
2	<b>Agency/Group/Organization</b>	United Way
	<b>Agency/Group/Organization Type</b>	United Way
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City routinely meets with United Way staff to discuss homeless strategies. The President & CEO of the United Way also sits on the Mayor's Commission to Combat Poverty.
3	Agency/Group/Organization	Lancaster Housing Opportunity Partnership
	Agency/Group/Organization Type	Housing Services - Housing Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	<p>In 2020, the City of Lancaster will continue to support the Fair Housing Program. This program is carried out by the Lancaster Housing Opportunity Partnership (LHOP) and receives CDBG Administrative funds to address impediments identified in the 2013 Analysis of Impediments to Fair Housing Choice. LHOP has been an integral part in the update of the Analysis of Impediments to Fair Housing Choice (2021 – 2027), a document that guides decisions in this document.</p> <p>A City staff member attend all planning meetings regarding this documents development. A City staff member also sits on the HEEI Collaborative Committee Meeting and the HEEI Collaborative: Fair Housing Summit Planning Committee. These meetings and initiatives inform the action plan</p> <p>LHOP is also involved in the Leadership of the Lancaster County Coalition to End Homelessness; LHOP's Executive Director is on a sub-committee for the Mayor's Commission to Combat Poverty; LHOP is also part of the Coalition for Sustainable Housing and the Fair Housing Program is run by LHOP staff.</p>
4	Agency/Group/Organization	Tabor Community Services
	Agency/Group/Organization Type	Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Tabor is a member of various committees under the Coalition to End Homelessness and is also the provider of coordinated assessment, emergency shelter, and rapid re-housing programs. Tabor actively provides input on policies and strategies.

5	Agency/Group/Organization	Lancaster City Alliance
	Agency/Group/Organization Type	Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City adopted "Building on Strength" as its economic development plan, which was developed by the Lancaster City Alliance. A City representative sits on the Board.
6	Agency/Group/Organization	Lancaster County
	Agency/Group/Organization Type	Housing Services - Housing Other government - County Planning organization Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy How transportation plays into the community's economy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Lancaster routinely works closely with the Lancaster County Planning Department and the Lancaster County Inter-Municipal Committee (LIMC). The LIMC is a Council of Governments comprised of 9 municipalities located in the central part of Lancaster County, including and surrounding the City of Lancaster, established to address inter-municipal challenges and concerns in central Lancaster County, Pennsylvania. It encourages and facilitates inter-municipal cooperation, helps coordinate multi-municipal programs and activities, undertakes projects that will benefit its member municipalities, and provides a forum for municipal officials to discuss issues of mutual interest.

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

N/A

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
<b>HEADING HOME: Ten Year Action Plan to Prevent and End Homelessness</b>	<b>Lancaster County Coalition to End Homelessness (Lanc Co MyHome)</b>	<p>The City of Lancaster works in coordination with the Lancaster County Coalition to End Homeless (Lanc Co MyHome), which is the lead agency in charge of Lancaster's CoC. The City participated in a joint funding application process run by the Lanc Co MyHome to award its ESG funds. Two City representative sits on the Governance Board.</p> <p>Lanc Co MyHome has established the HEADING HOME Ten Year Action Plan to Prevent and End Homelessness. The City coordinates its ESG funds with the goals and actions established in the plan.</p>

		<p>Additionally, Lanc Co MyHome has recently released its strategic plan that will build capacity and focus direction.</p> <p>Hospitals, county behavioral health, RMO, housing and other various social service providers are represented at the various levels of the Continuum of Care. City and County staff participate at all levels of the Continuum of Care.</p> <p>The City also meets with the lead agency, the Lancaster Country Redevelopment Authority (recipient of entitlement ESG funds), and United Way (private funding provider) to coordinate efforts. The City has consulted with the CoC regarding its 2020 ESG program.</p>
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**Table 3 - Other local / regional / federal planning efforts**

## Participation

### Summary of citizen participation process/Efforts made to broaden citizen participation

A legal advertisement was placed in the Lancaster Newspaper on Thursday, April 16th, 2020 announcing the 30-day public comment period. A public meeting and City Council Meeting will be announced in an upcoming public notice. The draft plan is currently on the City's website. Any comments will be included as an appendix in the final draft of the 2020 Annual Action Plan and all comments will be considered in the final adaptation of the plan.

Mayor Sorace's Administration values public outreach and feedback. We are committed to developing processes and procedures that effectively engages the public and accurately garners public concerns and comments.

### Citizen Participation Outreach - TBD

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
TBD						

Table 4 – Citizen Participation Outreach



## Expected Resources

### Introduction

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

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

### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1			Total	Narrative Description
			Annual Allocation	Program Income	Prior Year Resources		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$1,708,182	\$25,000	\$0	\$1,733,182	Entitlement Amount and estimated Program Income
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	\$145,929	\$0	\$0	\$145,929	Entitlement Amount

**Table 1 - Expected Resources – Priority Table**

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

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

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

The matching requirements for City of Lancaster's CDBG will be met by way of the City's General Funds.

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

Programs will be matched by VA funds, the Pennsylvania Coalition Against Domestic Violence, United Way, Continuum of Care funds and other private donations.

All matched funds will pay for expenses that are eligible under ESG, such as coordinated assessment, homelessness prevention, street outreach, rental and financial assistance, case management and shelter operations.

## Annual Goals and Objectives

### Goals Summary Information

Goal Name	Years	Category	Location	Needs Addressed	Funding	Goal Outcome Indicator
Housing	2016 - 2020	Affordable Housing	Lancaster City	Maintain Affordable Housing & Provide Suitable Living Environment	CDBG: \$697,000	Public service activities for Low/Moderate Income Housing Benefit: 175 Households Assisted  Homeowner Housing Rehabilitated: 35 Household Housing Unit  Housing Code Enforcement/Foreclosed Property Care: 2,500 Household Housing Unit
Removal of Blight				Provide Suitable Living Environment	CDBG: \$100,000	Homeowner Housing Rehabilitated: 25 Household Housing Unit
Economic Development		Non-Housing Community Development		Expand Economic Opportunities	CDBG: \$36,948	Jobs created/retained: 35 Jobs  Businesses Assisted: 20
Create Suitable Living Environment		Non-Housing Community Development		Provide Suitable Living Environment	CDBG: \$570,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 12,585 Households Assisted  Public service activities for Low/Moderate Income Housing Benefit: 12,585 Households Assisted
Assist Homeless Persons		Homeless		Homeless Services	ESG: \$145,929	Tenant-based rental assistance / Rapid Rehousing: 50 Households Assisted

**Table 2 – Goals Summary**

### Goal Descriptions

- 1 **Goal Name**      Housing  
**Goal Description**      The Lead Hazard Reduction and Critical Repair Program provides risk assessments and financial assistance to 35 income-qualified homeowners and investor owners for the purpose of reducing or eliminating lead hazards. The Fair Housing Program provides technical assistance services to 150 households (landlords and tenants) in relation to Fair Housing law and landlord/tenant issues. The Code Enforcement Program improves the health and safety conditions in all city homes and stops the spread of blight through proactive code enforcement - approximately 2,500 housing units will be served. The housing social worker position acts as a liaison between the City and various social service agencies, coordinating a community response to 25 households experiencing severe personal and family problems signaled by recurring calls for housing service.
  
- 2 **Goal Name**      Removal of Blight

- Goal Description** The Vacant & Blighted Program acquires 25 vacant and/or blighted residential and commercial properties housing units and makes these properties available as quality affordable housing for income qualifies residents. This is a last resort strategy (after all other code enforcement efforts have been deemed unsuccessful).
- 3 Goal Name** Economic Development
- Goal Description** The Assets Program provides small business training, mentoring, loans and other technical assistance to lower-income men and women who wish to establish or expand microenterprise businesses resulting in 35 new or sustained job opportunities in the City of Lancaster.
- 4 Goal Name** Create Suitable Living Environment
- Goal Description** The Street Improvement Program improves selected segments of streets in targeted areas through street paving and the installation of ADA ramps.
- The Neighborhood Crime Prevention Program funds extra patrols of street operations group primarily stationed in lower-income areas of the City. The objective of the unit is to reduce crime and improve the quality of life for residents in City neighborhoods.
- According to the FY 2020 Income Limits Summary, for Lancaster Metropolitan Statistical Area - a low income family of four makes approximately \$63,600. The Census American Community Survey's 2018 5-year Estimate, of the 22,118 households in the city of Lancaster, 56.9 percent or 12,585 households had an income below \$63,600. These 12,585 households are located throughout the city's residential neighborhoods but are concentrated on the southside of the city. These neighborhoods and these households are our target population for these two programs.
- 5 Goal Name** Assist Homeless Persons
- Goal Description** The Rapid Rehousing Program provides short and medium-term rental assistance, casework, and housing relocation and stabilization services to our homeless community.

## Projects

### Introduction

The City will continue to support housing, public service, economic development and programs that assist those at -risk of or experiencing homelessness. (See the 2020 CDBG ESG Funding Summary Attachment for a breakdown of activities.)

#### # Project Name

- 1 Critical Repair and Lead Hazard Reduction Program Administration
- 3 Neighborhood Crime Reduction
- 4 Street Improvement
- 5 ASSETS Micro-enterprise Development
- 6 Housing Code Enforcement
- 7 Housing Social Worker
- 8 CDBG Administration and Comprehensive Plan Development
- 9 Vacant & Blighted
- 1 Fair Housing Activity
- 0
- 1 ESG19 City of Lancaster (20-21)
- 1

### Project Summary Information

PROJECT NAME	CRITICAL REPAIR AND LEAD HAZARD REDUCTION PROGRAM ADMINISTRATION
TARGET AREA	Lancaster City
GOALS SUPPORTED	Housing
NEEDS ADDRESSED	Maintain Affordable Housing & Provide Suitable Living Environment
FUNDING	CDBG: \$244,000
DESCRIPTION	<p>The Lead Hazard Reduction Program provides risk assessments and financial assistance to income qualified homeowners and investor owners for the purpose of reducing or eliminating lead hazards. The work performed is determined by the results of the Risk Assessment and may include repairs to items such as doors, windows, and floors. 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. The City of Lancaster will successfully make 710 housing units lead-safe over a 60 month period. The Healthy Homes Supplemental Funding requested will enable the City to address other health hazards; such as radon, mold, and tripping hazards; in 120 homes. 35 annually supported through CDBG.</p> <p>The Critical Repair program provides financial and technical assistance for the critical repairs of eligible, owner-occupied, single family housing units in the City of Lancaster. All financial assistance provided will be a deferred loan at 0% interest. Often times, eligible properties are identified through the Lead Hazard Reduction Program applicants. Housing and Neighborhood Revitalization Unit staff and/or a City Inspector inspect each property to determine the seriousness. All repairs need to be deemed as an emergency by the inspector. Types of repairs may include: water heaters, broken sewer pipes, non-operable furnaces, roof repair/replacement, structural problems, plumbing and/or, electrical.</p>
TARGET DATE	12/31/2020
ESTIMATE THE NUMBER AND TYPE OF FAMILIES THAT WILL BENEFIT FROM THE	<p>The Lead Hazard Reduction Program provides risk assessments and financial assistance to 35 income-qualified homeowners and investor owners.</p> <p>The Critical Repair Program provides financial and technical assistance for the critical repairs of 35 eligible, owner-occupied, single-family housing units in the City of Lancaster.</p>

PROPOSED ACTIVITIES	
LOCATION DESCRIPTION	City of Lancaster
PLANNED ACTIVITIES	<p>Lead Hazard Reduction Program</p> <ul style="list-style-type: none"> <li>• Risk assessments</li> <li>• Financial assistance to income qualified homeowners and investor owners for the purpose of reducing or eliminating lead hazards.</li> <li>• Work performed is determined by the results of the Risk Assessment and may include repairs to items such as doors, windows, and floors.</li> <li>• 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.</li> </ul> <p>Critical Repair Program</p> <ul style="list-style-type: none"> <li>• Financial and technical assistance for the critical repairs of eligible, owner-occupied, single family housing units in the City of Lancaster. All financial assistance provided will be a deferred loan at 0% interest.</li> <li>• All repairs need to be deemed as an emergency by the inspector.</li> <li>• Types of repairs may include: water heaters, broken sewer pipes, non-operable furnaces, roof repair/replacement, structural problems, plumbing and/or, electrical.</li> </ul>
PROJECT NAME	NEIGHBORHOOD CRIME REDUCTION
TARGET AREA	Lancaster City
GOALS SUPPORTED	Create Suitable Living Environment
NEEDS ADDRESSED	Provide Suitable Living Environment
FUNDING	CDBG: \$120,000
DESCRIPTION	The Neighborhood Crime Prevention Program funds extra patrols of street operations group primarily stationed in lower-income areas of the City. The objective of the unit is to reduce crime and improve the quality of life for residents in City neighborhoods.
TARGET DATE	12/31/2020
ESTIMATE THE NUMBER AND TYPE OF FAMILIES THAT WILL BENEFIT FROM THE PROPOSED ACTIVITIES	According to the FY 2020 Income Limits Summary, for Lancaster Metropolitan Statistical Area - a low income family of four makes approximately \$63,600. The Census American Community Survey's 2018 5-year Estimate, of the 22,118 households in Lancaster City, 56.9 percent or 12,585 households had an income below \$63,600.
LOCATION DESCRIPTION	These 12,585 households are located throughout the city's residential neighborhoods but are concentrated on the southside of the city. These neighborhoods and these households are our target population for these two programs.
PLANNED ACTIVITIES	<ul style="list-style-type: none"> <li>• Extra patrols of street operations group primarily stationed in lower-income areas of the City.</li> <li>• Reduce crime and improve the quality of life for city residents.</li> </ul>
PROJECT NAME	STREET IMPROVEMENT
TARGET AREA	Lancaster City
GOALS SUPPORTED	Create Suitable Living Environment
NEEDS ADDRESSED	Provide Suitable Living Environment
FUNDING	CDBG: \$270,000

<b>DESCRIPTION</b>	The Street Improvement Program installs and repairs streets, street drains, storm drains, ADA curbs and gutter, tunnels, bridges, and traffic lights/signs.
<b>TARGET DATE</b>	12/31/2020
<b>ESTIMATE THE NUMBER AND TYPE OF FAMILIES THAT WILL BENEFIT FROM THE PROPOSED ACTIVITIES</b>	According to the FY 2020 Income Limits Summary, for Lancaster Metropolitan Statistical Area - a low income family of four makes approximately \$63,600. The Census American Community Survey's 2018 5-year Estimate, of the 22,118 households in Lancaster City, 56.9 percent or 12,585 households had an income below \$63,600.
<b>LOCATION DESCRIPTION</b>	These 12,585 households are located throughout the city's residential neighborhoods but are concentrated on the southside of the city. These neighborhoods and these households are our target population for these two programs.
<b>PLANNED ACTIVITIES</b>	<ul style="list-style-type: none"> <li>Currently, two street improvement projects have been identified along two important streets in the southside of the city - Duke Street and Howard Avenue. Both of these streets have adjacent communities that are of low and moderate-income.</li> </ul>
<b>PROJECT NAME</b>	<b>ASSETS MICROENTERPRISE DEVELOPMENT</b>
<b>TARGET AREA</b>	Lancaster City
<b>GOALS SUPPORTED</b>	Economic Development
<b>NEEDS ADDRESSED</b>	Expand Economic Opportunities
<b>FUNDING</b>	CDBG: \$36,948
<b>DESCRIPTION</b>	The Assets Program provides small business training, mentoring, loans and other technical assistance to lower-income men and women who wish to establish or expand microenterprise businesses.
<b>TARGET DATE</b>	12/31/2020
<b>ESTIMATE THE NUMBER AND TYPE OF FAMILIES THAT WILL BENEFIT FROM THE PROPOSED ACTIVITIES</b>	5 new job opportunities in the City of Lancaster. 20 Businesses Assisted.
<b>LOCATION DESCRIPTION</b>	City of Lancaster Residents who are of low or moderate-income. Work will happen at 24 S Queen St, Lancaster, PA 17603.
<b>PLANNED ACTIVITIES</b>	<ul style="list-style-type: none"> <li>small business training, mentoring, loans and other technical assistance to lower-income men and women who wish to establish or expand microenterprise businesses.</li> </ul>
<b>PROJECT NAME</b>	<b>HOUSING CODE ENFORCEMENT</b>
<b>TARGET AREA</b>	Lancaster City
<b>GOALS SUPPORTED</b>	Housing
<b>NEEDS ADDRESSED</b>	Provide Suitable Living Environment
<b>FUNDING</b>	CDBG: \$358,000
<b>DESCRIPTION</b>	The Code Enforcement Program - Improves the health and safety conditions in all city homes, prevents deterioration of the City's housing stock, and stops the spread of blight through proactive code enforcement.
<b>TARGET DATE</b>	12/31/2020

ESTIMATE THE NUMBER AND TYPE OF FAMILIES THAT WILL BENEFIT FROM THE PROPOSED ACTIVITIES	Approximately 2,500 housing units will be served.
LOCATION DESCRIPTION	The activity's residential area benefit is defined in detail in our appendix. It benefits all residents in our low-income residential areas area, where at least 51 percent of the residents are LMI persons. This activity benefits all LMI residents in a service area by monitoring and sustaining a standard of housing, preventing blight and upcoming suitable, affordable housing.
PLANNED ACTIVITIES	<ul style="list-style-type: none"> <li>Proactive code enforcement including systematic rental inspections, some complaint inspections, condemnations (when necessary) and owner-occupied exterior inspections.</li> </ul>
PROJECT NAME	HOUSING SOCIAL WORKER
TARGET AREA	LANCASTER CITY
GOALS SUPPORTED	Housing
NEEDS ADDRESSED	Maintain Affordable Housing
FUNDING	CDBG: \$75,000
DESCRIPTION	<p>The Housing Social Worker (HSW) is a professional position responsible for providing social service support to the City of Lancaster's Community Planning and Economic Development Department (CPED) and members of the community with low/moderate income. The Housing Social Worker is available to members of CPED as well as members of the community as an assistance, information, and referral source. The Housing Social Worker acts as a liaison between the City and the various social service agencies providing follow-up and monitoring of cases upon request from CPED. The Housing Social Worker provides a coordinated community response with access to a variety of agencies to deal with severe personal and family problems signaled by recurring calls for housing service. Housing and Code Enforcement Inspectors described an increasing number of interactions with community members where an unmet need was apparent, despite the availability of services in the community. Additionally, data revealed that a percent of properties received consistent, repeat emergency housing, police, and/or fire services. Are there other services available in the community that could better address the core needs of residents living in properties that repeatedly call for City emergency housing, police, and fire services. Furthermore, would a social worker, with a human centered skill set, be able to forge those connections successfully. The Director of Neighborhood Engagement and Deputy Directory of Community Planning and Economic Development collaborated in piloting a social worker position in 2019 with the goal of quantifiably increasing the position from temporary and part-time to a fulltime, fully-funded position in 2020.</p>
TARGET DATE	12/31/2020
ESTIMATE THE NUMBER AND TYPE OF FAMILIES THAT WILL BENEFIT FROM THE PROPOSED ACTIVITIES	25 low/moderate income households will be assisted with this public service activity every year (6 – 7 quarterly).
LOCATION DESCRIPTION	Any low/mod income city resident can take part in the program.



PLANNED ACTIVITIES	<ul style="list-style-type: none"> <li>• Housing information, education, and referral services.</li> <li>• General budget/financial counseling.</li> </ul>
PROJECT NAME	<b>CDBG ADMINISTRATION AND COMPREHENSIVE PLAN DEVELOPMENT</b>
TARGET AREA	Lancaster City
GOALS SUPPORTED	Housing Removal of Blight Economic Development Create Suitable Living Environment
NEEDS ADDRESSED	Maintain Affordable Housing Provide Suitable Living Environment Expand Economic Opportunities
FUNDING	CDBG: \$329,234
DESCRIPTION	<p>This project will cover the direct and indirect administrative costs of the CDBG program. Costs include salaries, fringes, space rental, audit costs, office supplies, and other administrative costs.</p> <p>Additionally, this project will cover the development of an update of a comprehensive plan for the city of Lancaster. The Comprehensive Plan is a framework that reflects a community consensus about the direction for future growth and community development in our city over the next 15 to 20 years. The Plan is an opportunity for Lancaster's community to set the goals and policies that should be followed in order to improve the quality of life in our city. The priorities set by this plan will help guide and affordability and land use plan - and thus the use of the City's CDBG dollars.</p>
TARGET DATE	12/31/2020
ESTIMATE THE NUMBER AND TYPE OF FAMILIES THAT WILL BENEFIT FROM THE PROPOSED ACTIVITIES	All city of Lancaster residents will benefit indirectly from CDBG administration and the development of a comprehensive plan.
LOCATION DESCRIPTION	City of Lancaster
PLANNED ACTIVITIES	<ul style="list-style-type: none"> <li>• Direct and indirect administrative costs of the CDBG program (salaries, fringes, space rental, audit costs, office supplies, and other administrative costs).</li> <li>• The development of an update of a comprehensive plan for the city of Lancaster.</li> </ul>
PROJECT NAME	<b>VACANT AND BLIGHTED</b>
TARGET AREA	Lancaster City
GOALS SUPPORTED	Removal of Blight
NEEDS ADDRESSED	Maintain Affordable Housing Provide Suitable Living Environment
FUNDING	CDBG: \$100,000
DESCRIPTION	<p>Acquisition of vacant and/or blighted residential and commercial properties. Used as a last resort strategy after all other code enforcement efforts have been deemed unsuccessful. Increases the availability of quality affordable housing and economic opportunities for Lancaster residents.</p>
TARGET DATE	12/31/2020

ESTIMATE THE NUMBER AND TYPE OF FAMILIES THAT WILL BENEFIT FROM THE PROPOSED ACTIVITIES	Acquire and navigate the renovation of 25 properties in blighted condition to be repurposed as affordable housing
LOCATION DESCRIPTION	City of Lancaster
PLANNED ACTIVITIES	<ul style="list-style-type: none"> <li>• Acquisition of vacant and/or blighted residential and commercial properties.</li> <li>• Increases the availability of quality affordable housing.</li> </ul>
<b>PROJECT NAME</b>	<b>FAIR HOUSING</b>
TARGET AREA	Lancaster City
GOALS SUPPORTED	Housing
NEEDS ADDRESSED	Maintain Affordable Housing Provide Suitable Living Environment
FUNDING	CDBG: \$20,000
DESCRIPTION	In 2020, the City of Lancaster will continue to support the Fair Housing Program. This program is carried out by the Lancaster Housing Opportunity Partnership (LHOP) and receives CDBG Administrative funds to address impediments identified in the 2013 Analysis of Impediments to Fair Housing Choice. The program also provides services to landlords and tenants in relation to Fair Housing law and landlord/tenant issues
TARGET DATE	12/31/2020
ESTIMATE THE NUMBER AND TYPE OF FAMILIES THAT WILL BENEFIT FROM THE PROPOSED ACTIVITIES	Approximately 150 households will see service through technical assistance in Fair Housing law. See additional sections for further details on the Fair Housing Program.
LOCATION DESCRIPTION	Any low/mod income city resident can apply for technical assistance.
PLANNED ACTIVITIES	<ul style="list-style-type: none"> <li>• Address impediments identified in the 2013 Analysis of Impediments to Fair Housing Choice.</li> <li>• Provide services/technical assistance to landlords and tenants in relation to Fair Housing law and landlord/tenant issues.</li> </ul>
<b>PROJECT NAME</b>	<b>EMERGENCY SOLUTIONS PLAN 2020/2021</b>
TARGET AREA	Lancaster City
GOALS SUPPORTED	Assist Homeless Persons
NEEDS ADDRESSED	Homeless Services
FUNDING	ESG: \$145,929
DESCRIPTION	Use \$110,000 in ESG dollars to provide short and medium term rental assistance, casework, and housing relocation and stabilization services to our homeless community. Remaining will be used for administration of the grant.
TARGET DATE	06/30/2021
ESTIMATE THE NUMBER AND TYPE	50 households.

OF FAMILIES THAT  
WILL BENEFIT  
FROM THE  
PROPOSED  
ACTIVITIES  
LOCATION  
DESCRIPTION  
PLANNED  
ACTIVITIES

City of Lancaster

- Rapid Re-Housing services.

## Geographic Distribution

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

All funds will be used in the City of Lancaster. Projects that have direct beneficiaries will only serve low- and moderate-income households, while other programs will provide CDBG funds only in low- and moderate-income areas of the City.

### Geographic Distribution

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

Table 4 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

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

## Homeless and Other Special Needs Activities

### Introduction

The City of Lancaster works in coordination with the Lancaster County Coalition to End Homeless (Lanc Co My Home), which is the lead agency in charge of Lancaster's CoC. The Lanc Co MyHome has established the HEADING HOME Ten Year Action Plan to Prevent and End Homelessness. The City coordinates its ESG funds with the goals and actions established in the plan. Additionally, Lanc Co MyHome has recently released its strategic plan that will build capacity and focus direction. The City has consulted with the CoC regarding its 2020 ESG program.

The City is also involved in Lanc Co MyHome boards and committees; employees attend the Homeless Service Providers Network meeting, the Continuum of Care Planning Committee and the Lanc Co MyHome Governance Board and Funding Committee. The City also meets with the lead agencies (the Lancaster County Redevelopment Authority, the United Way, and Lanc Co MyHome staff) bi-monthly for a report on the spending of ESG and other HUD dollars.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs.**

Homeless outreach workers provide street-based and shelter-based outreach to persons experiencing homelessness. These workers build relationships with persons experiencing homelessness and connect them with services. Outreach workers also build relationships with clients at The Community Homeless Outreach Center (CHOC). CHOC is a daytime drop-in facility that provides showers, mailboxes, telephone and internet usage, and a variety of other services to persons experiencing homelessness. Once relationships are built, outreach workers connect CHOC clients with additional services. Lancaster County began its coordinated assessment/single point of entry system, known as Community Homeless Assessment and Referral Team (CHART), in September 2013. CHART contracted with United Way 211 to provide initial client screening into the single point of entry system. CHART workers are mobile, allowing them to conduct face-to-face initial assessments to clients who are at emergency shelters, the daytime drop-in center, on the street or in other areas. Outreach Workers are trained to conduct CHART assessments. This decreases the number of contacts a client needs to work with to obtain the services they need.

CHART does the following:

- Ensures that households at imminent risk of homelessness get the right services at the right time and at the right level;
- Provides a single, trusted access point individuals and families can turn to for homeless prevention services, assessment, light case management and referral to emergency housing and other services to help get back on their feet;
- Focus on diversion and prevention whenever possible with shelter entry only when no other option or resource is available;
- Recognize that a successful SPE is dependent upon full provider buy-in; must have sufficient housing specialists, diversion and rapid re-housing resources; and must include permanent housing resource identification/referral at point of entry.

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

The Lancaster County Coalition to End Homelessness (Lanc Co MyHome) continues to monitor the need of emergency and transitional housing. Emergency shelter that can be accessed by any family type is the highest priority to receive funding in 2020 because this is the biggest area of need in the community.

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

Current City Shelters include: TLC (overnight and day shelter), YWCA (overnight, for women), Women's Winter Shelter and St Mary's Church (overnight, operates solely during the winter months to help with overflow), and the Water Street Mission (overnight). Each shelter provider has plans in place to respond to emergency/urgent situations (such as COVID-19). Currently, they have ramped up cleaning of the facilities and have ensured that food is available to all individuals and families receiving services from the shelter. Service providers have moved as much as possible to virtual/phone calls/remote work. Outreach is continuing but using social distancing.

Along with the above-mentioned shelters, there are 28 other locations that offer food to those struggling with food insecurity. These services have adapted to emergency/urgent situations, offering bagged or drive-through options. Additionally, meals on wheels has boosted its services to provide for community members afraid to leave their house for food.

CHART assessments are also conducted before any individual or family can enter emergency shelter or transitional housing, except for those fleeing domestic violence. These assessments are designed to match each individual to the service that will best meet their core needs.

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

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

In response to the 2017 bottleneck of rapid rehousing services (see AP – 35 for more information), Lanc Co MyHome formed a Rapid Rehousing Process Analysis and Review Committee in 2018-2019 to review, analyze, and recommend changes to the referral/connection process for our rapid rehousing services. Key City staff sat on the committee and participated in the committee's review process. Based on the analysis and ideation from this committee, the Lanc Co MyHome will refocus its Continuum of Care dollars on new, innovative programs to explore other avenues for impact. Additionally, the Lanc Co MyHome will redesign a model, centralizing and standardizing Rapid Rehousing programs.

In the 2019 program year, a new Rapid Rehousing approach was formalized where service providers will all be subject to a 3-month client timeline and focus on a solution-driven, exit strategy for their clients instead of sustaining the same clients for long periods of time. We believe that the skills and disciplines taught through the provision of services as well and the resources identified in the individual Housing Plan works to prevent formerly homeless persons from returning to homelessness. Self-sufficiency is the primary goal of the program. Although outcomes in 2019 did not show an improvement, we are determined to give the program one full program year to exhibit returns. We are very hopeful this new strategy will change our outcomes for the 2020 year.

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

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions) or,**

**receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

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

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

## Barriers to affordable housing

### Introduction

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

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

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

Additionally, the City recognizes the growing challenges in affordability and the need to develop an intentional, collaborative and impactful housing affordability strategy. In anticipation of our upcoming 2021 -2025 Consolidated Action Plan and 2021-2027 update to the Analysis of Impediments to Fair Housing, the City has contracted with the Center for Regional Analysis to undergo the development of a core set of data that informs its design and implementation of policies and strategies to address the challenge of housing affordability for its residents. This proposed scope of work focuses on the City's rental market, specifically for households often described as ALICE (i.e. asset limited, income constrained, employed) or "working poor". Its objective is to provide information that frames the current and future challenges of housing affordability from two perspectives, (i) supply side, which examines the availability of affordable housing, and (ii) the demand side, which characterizes the need for affordable housing options. Importantly, the analysis is designed to be updated as new information and data emerge (e.g. changes in AMI, availability of 2020 Census data).

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

The preservation and improvement of affordable housing in low - and very low-income neighborhoods is a long-term goal of the City. Achievement of this goal will be promoted in 2020 through (1) continuous, aggressive code enforcement by the staff of the City's "Housing Code Enforcement Program", (2) City efforts through its "Lead Hazard Reduction Program," to rehabilitate owner occupied housing, restoring the dwelling units to livable conditions, and preventing them from being lost, and (3) the provision of assistance to low - and very low-income City homeowners to remediate an emergency home repair through the "Critical Home Repair Loan Project."

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

The City administers a "Lead Hazard Reduction Program" for households in specific census tracts with high need to help them maintain the condition and integrity of their homes and protect against lead poisoning. The Project serves low and moderate-income residents. The City will conduct through this Project childhood lead poisoning prevention activities that identify children under the age of six that have lead-based paint poisoning or may be subject to lead hazards. The City will work to eliminate their health problems and to control and reduce lead paint hazards in the environment of its children.

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



## **Discussion**

The Redevelopment Authority of the City of Lancaster (in close coordination with the City Department of Economic Development and Neighborhood Revitalization) operates the “Vacant and Blighted Property Acquisition and Disposition Project” through which it obtains control of blighted, unoccupied homes within the city. The blighted homes are acquired through purchase or eminent domain. The properties must have been condemned for 30-days or vacant for 90 days. The Authority then sells them to individuals, developers, or City agencies for rehabilitation. During 2020, it is expected that 25 affordable, single-family units will be acquired, rehabilitated and sold. A deed restriction is placed on each single-unit residential property sold, requiring the property to be owner-occupied. This restriction will help to stabilize neighborhoods by promoting homeownership.

## Other Actions

### **Actions planned to address obstacles to meeting underserved needs and foster and maintain affordable housing.**

The City's Critical Repair Program and Lead Hazard Control Program both focus on maintaining stable, affordable and quality housing for households under 80% AMI. The City's Code Enforcement Program and Vacant Property Programs ensure 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 and works with SACA Development Corp. (a qualified CHDO) in their development of affordable housing, particularly in the South East area of Lancaster City, which has a concentration of minority and low-income households.

Other actions that will continue during the 2020 program year to address the obstacles to meeting the underserved needs include:

- Lead Paint Hazard Reduction for units in the highest need census tracts in the City,
- First-time homebuyer programs are administered to help make housing affordable,
- Fair Housing program provided education and mediated issues between landlords and tenants,
- Conditions of slums and blight have been eliminated and substandard living conditions have been removed to provide suitable living environments, and
- Public service activities have been undertaken, including crime prevention measures to enhance and Lancaster's neighborhoods and increase access to services.

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

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

The City of Lancaster administers a Lead-Based Paint program that can assist eligible homeowners with reducing and/or abating lead hazards in their properties. This program has also been expanded to include rental properties. The City of Lancaster was a recipient of Lawrence County, PA, who received Lead-Based Paint Hazard control funds from HUD. Additionally, the City was recently awarded 9.7 million in Lead Hazard Reduction and Health Homes dollars, complemented with matching CDBG funds that over the course of five years will remediate lead hazards for 710 units in the highest need census tracts in the City of Lancaster. These funds allowed the City to address lead paint hazards in eligible properties. CDBG funds have and will be used as a match for these grants.

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

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

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

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

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

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

During 2020, CPED representatives will belong to a variety of committees and boards. This involvement helps the City to understand its role and responsibilities. These collaborative entities include:

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

From 2016 – 2020, the City has sought and will continue to seek to achieve the following goals regarding Lancaster's institutional structure:

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

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

City employees sit on various boards and committee whose memberships provide a network that spans private housing and social service agencies – such as Lancaster Housing Opportunity Partnership, Lancaster County Behavioral Health and Development Services, Lancaster County Refugee and Immigrant Coalition, and the Lancaster County Coalition to End Homelessness (Lanc Co MyHome). 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 Lanc Co MyHome, 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.

In 2019, the City was named a Welcoming City through Welcoming America thanks to the coordination of public and private housing and social service agencies who work to build a collective strategy/approach to serving new Americans in our community. Thanks to the work of the LCRIC, the coalition of social service agencies are meeting to formalize and document their plan into a single, Countywide strategy. The City has and will continue to support this effort.

#### **Discussion**

In 2020, the City of Lancaster will continue to support the Fair Housing Program. This program 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.

The City continued to address ADA accessibility by installing ADA curb cuts during 2019/2020, 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. In 2019, the City of Lancaster implemented its Language Access Plan and hired its first-ever Language Access Coordinator to ensure the implementation and regulation of the Language Access Plan (attached). Federally funded programs carried out by the City (Critical Repair Program and the Lead Hazard Control Program) have documents and information available in both English and Spanish. The manager of these programs is also bilingual and is available to translate for Spanish speaking residents.

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

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

### **Analysis of Impediments to Fair Housing (2014 – 2020)**

In 2020, The Fair Housing Program and the Street Improvement Program will be tasked with addressing the following impediments:

Impediment A: With an increasing number of people in the County, there is more demand for an ongoing education program for fair housing requirements. This impediment will be addressed by conducting the following:

- Fair Housing trainings in partnership with PHFA and other agencies
- Civil Rights in Housing Event
- Provided technical assistance (individuals duplicated per case/topic area)
- Distribution of the Tenant/Landlord Rights and Responsibilities Manual in print and electronically in 7 different languages.

Impediment D: Persons with disabilities are limited in where they go due to architectural barriers in the community and in private home construction like curbs, sidewalk, steps, narrow door openings, etc. This impediment will be addressed by conducting the following:

- Work with local disability organizations to explore creation of housing opportunities that will increase housing choice for this community.
- All public facilities will be ADA accessible.
- Street Improvement program will install ADA approved curbs across the city.

Impediment I: People with limited English proficiency may have barriers to fair housing.

- Work with local immigrant and resettlement organizations to address and ensure that fair housing rights are understood and accommodated for language barriered populations.
- Distribution of the Tenant/Landlord Rights and Responsibilities Manual in print and electronically in multiple languages, including Spanish
- Implement the Lancaster City Language Access Plan.

## Program Specific Requirements

### Community Development Block Grant Program (CDBG)

#### Reference 24 CFR 91.220(I)(1)

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

<i>1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed</i>	<i>\$10,604.52</i>
<i>2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.</i>	<i>0</i>
<i>3. The amount of surplus funds from urban renewal settlements</i>	<i>0</i>
<i>4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan</i>	<i>0</i>
<i>5. The amount of income from float-funded activities</i>	<i>0</i>
<b>Total Program Income:</b>	<b>0</b>

### Other CDBG Requirements

<i>1. The amount of urgent need activities</i>	<i>0</i>
<i>2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.</i>	<i>81 %</i>

## Emergency Solutions Grant (ESG)

### **Include written standards for providing ESG assistance (may include as attachment)**

See Attachment - Standards and Policies

### **If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.**

Since September 2013, the Community Homeless Assessment and Referral Team, known as CHART, has been the serving as the coordinated assessment system, which serves those experiencing homelessness and at imminent risk of homelessness in Lancaster County.

All calls originate from the United Way's 211 system, which conducts a pre-screening. Households experiencing or at imminent risk of homelessness are then connect to CHART, who performs an assessment and make appropriate referrals to shelter, rapid rehousing programs or diverts the client from shelter if possible. CHART will conduct a VI-SPDAT for any household that has not self-resolved within 10 days of entering the system. The VI-SPDAT is the priority tool used by Lancaster to gain entry into a Permanent Supportive Housing program, or be referred to a rapid rehousing program (these referrals are prioritized based on the VI-SPDAT).

### **Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).**

The City of Lancaster has partnered with the Lancaster County Housing & Redevelopment Authorities, the United Way of Lancaster and the Lancaster Coalition to End Homelessness in a joint application process for the second year. All these agencies provide funds for homeless services in Lancaster. A single application was created to access all these funds. The Lanc Co MyHome Governance Board reviews and scores grant applications and makes funding recommendations. The City and other partners work together to identify the most efficient and effective use of funds. Lancaster City Council will make final approval of all grants awarded using City ESG funds.

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

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

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

### **Describe performance standards for evaluating ESG.**

These are the outcomes that will be measured by your program:

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

Activity Name	National Objective	Matrix Code	Funded 2019	2020 Funding Proposal for Public Comment
CDBG Planning & Admin	N/A	21A	\$ 180,000	\$ 175,000
Comprehensive Planning		20	NOT PREVIOUSLY FUNDED	\$ 99,999
Fair Housing Services		21D	\$ 20,000	\$ 20,000
Indirect Admin		21B	\$ 54,235	\$ 54,235
Duke Street Improvements	L/M Income Area Benefit	03K	\$ 270,000.00	\$ 225,000
Match for Keystone Grant	L/M Income Area Benefit	03K	NOT PREVIOUSLY FUNDED	\$ 225,000
Micro-enterprise Development	L/M Income Area Benefit	18C	\$ 5,000	\$ 36,948
City Lead Hazard Control	L/M Limited Clientele Benefit	14I	\$ 175,000	\$ -
Critical Repair and Lead Hazard Admin (MATCH)	L/M Income Area Benefit	14H	\$ 180,000	\$ 244,000
Critical Repair Program	L/M Limited Clientele Benefit	14A	\$ 87,000	\$ -
Housing Code Enforcement	L/M Income Area Benefit	15	\$ 525,000	\$ 358,000
Vacant & Blighted	Transition to L/M Income Housing (previously Slum and Blight)	01	\$ 69,544	\$ 100,000
Housing Social Worker	L/M Income Area Benefit	05X or 05Z	NOT PREVIOUSLY FUNDED	\$ 75,000
Neighborhood Crime Reduction	L/M Income Area Benefit 30	05I	\$ 120,000	\$ 120,000
		Totals:	\$ 1,685,779	\$ 1,733,182

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  
Emergency Solutions 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 Federally-funded Programs (see Exhibit One 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 and the Emergency Solutions Grant (ESG) Program (which are received through a competitive application process from the Commonwealth of Pennsylvania's Department of Community and Economic Development). Although these citizen participation requirements are designed especially to encourage participation by low- and very low-income persons, particularly those living in 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 (291-4743), the City's TDD number (TDD 291-4761), and an email address are also provided in meeting advertisements.

The City of Lancaster and the County have Lancaster have entered into a consortium for the Home Investment Partnership (HOME) Program. The Lancaster County Housing and Redevelopment Authority (LCHRA) is the lead agency for this consortium, and all citizen participation regarding the City's HOME funds is administered by LCHRA.

## 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, 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 Program through the Consolidated Plan, (2) the range of activities that may be undertaken through the Plan, (3) the focus on benefit to persons of low- and very low-income, and (4) the strategy to minimize displacement of persons and to assist any persons displaced.

Generally, because of reduced amounts of CDBG funds received by the City, an open application process does not occur. However, if the City receives enough funds to open an application process, the following two-phase procedure will be followed:

#### Phase One: 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 September 1 of each year, for activities expecting to receive funds under the Consolidated Grant Program starting January 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 Two: Review Panel for Funding of Applications

The City of Lancaster will submit applications for funding from the Consolidated Grant Program to the "Grant Application Review Panel(s)" 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.

1. MEETINGS WITH THE MAYOR

At least two times per year, the Mayor of the City of Lancaster holds neighborhood quadrant meetings. These meetings are advertised in all media outputs, including television, radio, newsprint, the City Newsletter which goes to every house in the City, and to neighborhood groups. The meetings are held in 5 different locations around the City. This provides greater accessibility for those who live in different sections of the City. It also provides multiple meeting dates to be more accessible for citizens with differing schedules. At the meetings, citizens are informed about City projects and programs. The citizens are given the opportunity to ask questions and to share their comments and concerns with the Mayor. The Mayor shares this information with appropriate City staff, which is discussed and taken into consideration during plan development.

2. ANNUAL ACTION PLAN ADVERTISEMENT AND COMMENT PERIOD

A notice announcing the draft of the proposed Annual Action Plan is placed in the legal section of the local newspaper. This same notice appears on the City's website, where a draft of the plan is located electronically. Citizens may also visit City Hall to review a copy of the plan. Citizen questions are directed to the Department of Economic Development and Neighborhood Revitalization. A 30-day public comment period is provided. Citizens are asked to submit comments in writing, either by letter or by email. All comments are considered and included in the submission of the plan.

3. ANNUAL PLAN ADVERTISEMENT & PUBLIC HEARING PRESENTATION

The proposed Annual Action Plan, 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 Lancaster Newspapers, and on the City's website, during the month of September. This announcement includes a notification of a public hearing, conducted in City Council Chambers concerning the proposed Action Plan and allocation of funds. A 30-day public comment period will be provided, starting from the date of the ad announcement. Copies of the Action Plan will be available to the public during the 30-day comment period, at City Hall and electronically on the City's website. All written comments received and all oral testimony at the public hearing will be recorded and made available as part of the Action Plan.

#### 4. 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 first City Council meeting in September. Council's role is to approve the submission of the "Action Plan" to the Federal Department of Housing and Urban Development (HUD).

#### 5. SUBMISSION OF THE PLAN TO HUD

The Consolidated Plan, on applicable years, and/or the Action Plan will be submitted to HUD 45 days prior to the start of the City's program year for Federally-funded activities on January 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.

#### 6. IMPLEMENTATION

Starting January 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.

### 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 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 December 31). 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 the Lancaster Newspaper, and on the City's website. The CAPER is advertised as available for review on the City's website and 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 and email address are also provided to obtain information regarding the City's CAPER.

The City will conduct an annual public meeting, generally in March regarding the CDBG program, for citizens to review and comment on the performance of the program activities which occurred during the program year (January 1 thru December 31 of the prior year)

### D. Access to Consolidated Program Information Regarding the Use of Program Funds

At any time during the course of the program year, every citizen of Lancaster City has access to information related to the projects and activities being financed with 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 program records is consistent with applicable State and local laws regarding privacy and obligations of confidentiality.

#### E. Emergency Solutions Grant (ESG) Application

The City of Lancaster competes for ESG funds from the Pennsylvania Department of Community and Economic Development (DCED). Prior to the expected announcement of the application process for ESG funds, the City will meet with current subrecipients of ESG funds, as well other agencies identified who wish to receive funds. The City and potential applicants will identify activities to be applied for, as well as potential funding requests when possible. The City will then meet with the lead agency of the Lancaster Continuum of Care (PA-510), for consultation of proposed activities and agencies included in the potential funding request. The City will then meet with the Continuum of Care Planning Committee and again present the proposed activities and agencies to be included in the application. Any comments or suggestions made by either the lead agency or the Continuum of Care Planning Committee will be taken into consideration for the design of the final application to DCED.

A notice announcing the application, the public comment period and the public meeting is placed in the legal section of the local newspaper. This same notice appears on the City's website, where a draft or a summary of the application is located electronically. Citizens may also visit City Hall to review a copy of the application, and a copy of the application is also available at the public meeting. Citizen questions are directed to the Department of Economic Development and Neighborhood Revitalization. A 30-day public comment period is provided, as long as the application release and the application deadline allow for a 30-day period. Citizens are asked to submit comments in writing, either by letter or by email. All comments are considered and included in the submission of the plan.

The application will be presented to City Council and will not be submitted to the DCED without the approval of City Council. City Council will be made aware of any citizen comments received during the comment period or public meeting. Citizens are also welcome to comment on the application during the public City Council meeting at which the application is presented. Comments will be considered prior to the submission of the application to DCED.

## 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 EDNR staff. Inquiries can be made by calling (717) 291-4743 (Voice) or (717) 291-4761 (TDY). Written inquiries should be addressed as follows:

City of Lancaster  
Federal Consolidated Grant Program  
Department of Economic Development and Neighborhood Revitalization

120 North Duke Street, PO 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, Action Plan, or amendments to the Plan or CAPER. 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, Action Plan, amendment to the Plan or CAPER. Complaints are answered in writing within 15 days of receipt by the City. Written complaints should be addressed as follows:

City of Lancaster  
Director,  
Department of Economic Development and Neighborhood Revitalization

120 North Duke Street, PO Box 1599  
Lancaster, Pennsylvania 17608-1599

### F. 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. The City can provide translation services for Spanish-speaking residents who come into the Municipal Building to obtain program information.

### G. Furnishing Technical Assistance to Groups Regarding the Development of Program Proposals Representative of Low- and Very Low-Income Persons

The City's Department of Economic Development and Neighborhood Revitalization staff provides technical assistance to individuals or organizations regarding matters related to the completion and submission of Program Funding Application Forms to the City, when such forms are utilized. Technical assistance is offered via a cover letter (including the name and phone number of

a contact person) which is attached to every Program 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 Community Development Block Grant Program.

## Exhibit One

### 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 directly from HUD. HOME funds are received jointly with the Lancaster County Housing and Redevelopment Authority (LCHRA) as the City and County are operating under a limited consortium for the HOME Program. The County is responsible for the submission of the 5-year Consolidated Plan, as well as the submission of the Annual Action Plan as it relates to the HOME Program. The City creates and submits a separate Annual Action Plan for the CDBG Program. The City receives ESG Program Funds from the Pennsylvania Department of Community and Economic Development, through a competitive application process.

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 January 1 to December 31.

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/very low-income persons living in federally-assisted and public housing to achieve self-sufficiency

The joint Lancaster City and County 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 City creates a one-year “Action Plan” that lists the activities the City will undertake during the next Program year using funds under the CDBG program 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 and Action 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.

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 November 15. The new Program Year will begin on January 1.

Two public hearings will be held concerning the Action Plan. The hearings will be conducted at three different stages in the Plan development process.

At the first public hearing, citizens will have the opportunity to review the City's proposed Action 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.

After the program year is complete, a second public meeting is held, where residents will have the chance to review program performance. The second public meeting is held prior to the submission of the Consolidated Annual Performance Evaluation Report (CAPER). All program activities carried out during the program year are included in the CAPER, and this public meeting allows citizens the opportunity to understand how federal funds were spent, and provide their feedback on program performance.

Lancaster's Action 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 November 15. The new Program Year will begin on January 1 and end December 31.

INTELLIGENCER JOURNAL, LANCASTER, PA.  
Friday, March 3, 1989

Legal Notice

Notice of CDBG Program Amendment Criteria

The City must amend its CDBG Program Statement whenever it decides to (1) carry out an activity not previously described in the Program Statement, (2) not carry out an activity described in the Statement, or (3) substantially change the purpose or scope, cost, location, or beneficiaries of a project activity as outlined in the most recent Statement.

A "substantial change" to a project activity is defined as a modification which changes the basic elements or characteristics of the project to the degree where it can be said that the project's "targeted beneficiaries" or geographic "service area" has been significantly altered in terms of the original purpose or scope of the project as described in the most current Statement.

A "substantial budgetary change" is defined as increasing or decreasing a project's original funding allocation by an amount greater than \$50,000 or 50 percent -- the lesser amount of money derived from these two calculations is the one used to determine whether or not a "substantial budgetary change" is being proposed. A "substantial budgetary change" is also defined as one where a series of cumulative budget amendments are made which increase the cost of a project by more than \$50,000 or 50 percent.

Prior to executing an amendment to its Statement, the City will provide citizens with reasonable notice of and an opportunity to comment on such proposed "substantial changes." The City will consider any comments and, if deemed appropriate, modify its proposed "substantial changes" prior to forwarding it to HUD.

LEGAL NOTICE City of Lancaster, Pennsylvania

Regarding the City's Federal Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG)

Notice for:  
PUBLIC COMMENT PERIOD AND PUBLIC MEETING FOR 2020 ANNUAL ACTION PLAN

Lancaster's draft Annual Action Plan describes the upcoming activities to be funded in 2020 under the federal Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG) Programs. A copy of the 2020 Annual Action Plan is available on the City's website at [cityoflanasterpa.com](http://cityoflanasterpa.com).

The City will accept citizen comments regarding the Annual Action Plan for 30 days (from April 16 to May 16). Comments can be Monday – Friday from 8:30 a.m. and 5:00 p.m. through the following methods:

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

A Virtual Public Meeting will take place from 4:00 – 6:00 p.m., Thursday, May 23<sup>rd</sup>. You can access the virtual meeting via phone (717) 275-8940 (Access Code: 1968695#) or via computer (<https://hello.freeconference.com/conf/call/1968695>).

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

Danene Sorace  
Mayor

**FILE OF THE CITY CLERK**

**ADMINISTRATION RESOLUTION NO. XX – 2020**

**INTRODUCED – APRIL 29, 2020**

**ADOPTED BY COUNCIL –**

**A RESOLUTION OF THE COUNCIL OF THE CITY OF LANCASTER AUTHORIZING THE MAYOR TO SUBMIT THE 2020 *ANNUAL ACTION PLAN* (YEAR FIVE OF THE CITY'S FIVE-YEAR *CONSOLIDATED PLAN*) TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD). THE SUBMISSION INCLUDES THE PROJECTED USE OF FUNDS FOR THE COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) AND EMERGENCY SOLUTIONS GRANT PROGRAMS (ESG) DURING THE 2020 PROGRAM YEAR.**

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

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

**WHEREAS**, the City of Lancaster has prepared an *Annual Action Plan* in accordance with Federal regulations for the 2020 Program period (January 1, 2020 to December 31, 2020); and

**WHEREAS**, the City of Lancaster is an "entitlement" City qualified, under the provisions of the Federal Housing and Community Development Act of 1974 (as amended), for Federal assistance in the amount of \$1,708,182 through the Community Development Block Grant (CDBG) Program and \$145,929 through the Emergency Solutions Grant (ESG) Program during Federal fiscal year 2019; and

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

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

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

**WHEREAS**, the City, following the public review and comment process specified in Federal Regulations, has prepared the required *Annual Action Plan* for 2019; and

**WHEREAS**, the submission of the 2020 *Annual Action Plan* will allow the City to receive the financial assistance as provided for under the Federal CDBG and ESG Program for the Program Year that will begin January 1, 2020;

**NOW, THEREFORE, BE IT RESOLVED** by the Council of the City of Lancaster that the Mayor is hereby authorized by City Council to submit the approved *Annual Action Plan*, including all certifications contained therein, to HUD, seeking a CDBG “entitlement” grant in the amount of \$1,708,182 and an ESG “entitlement” grant in the amount of \$145,929.

**BE IT FURTHER RESOLVED**, by the Council of the City of Lancaster that the Mayor is hereby authorized, in his capacity as Lancaster City’s Chief Executive Officer, to act fully on behalf of the City of Lancaster as its official representative in all matters pertaining to said *Annual Action Plan*, including the certifications contained therein and such additional information as may be required for the 2020 *Annual Action Plan*.

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Danene Sorace, Mayor

Attest:

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City Clerk

## **Lancaster City Limited English Proficiency Analysis and Language Access Plan**

### **Introduction**

Under Title VI of the Civil Rights Act of 1964, Limited English Proficiency (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 to document the City of Lancaster's dedication to (1) provide 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 as a pretext for discrimination against 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); and
3. Implement the Language Access Plan to provide appropriate language assistance.

As set forth in Exhibit "B", the City has completed step 1 and the promulgation and implementation of this Plan is meant to accomplish steps 2 and 3 above.

### **Language Access Coordinator**

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

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

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

- Consulting with local service providers that work closely with Lancaster City's LEP population. These providers are selected at the discretion of the Language Access Coordinator.
- Consulting with Lancaster City Department representatives involved with and/or knowledgeable about Federally funded Lancaster City services.
- Providing an annual update to 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;



- 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 at City Hall 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**

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.
- If after a client self-identifies as LEP and chooses not to use interpretation services offered to them, they will be asked to 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 websites. Lancaster City's website also includes an automatic translation into Spanish. Any documents or communications that are received by staff for LEP persons that are not in English shall be forwarded to the Language Access Coordinator for translation and then back to the appropriate staff person 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.

## APPENDIX A – Definitions

**HUD Guidance** is specifically Federal Register Vol. 72, No. 13, January 22, 2007

**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
<b>Spanish</b>	16,457	+/-993	29.9%	+/-1.8
<b>Speak English less than "very well"</b>	<b>6,571</b>	+/-756	<b>11.9%</b>	+/-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
<b>Spanish</b>	16,679	+/-972	30.2%	+/-1.8
<b>Speak English less than "very well"</b>	<b>6,800</b>	+/-710	<b>12.3%</b>	+/-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
- 1<sup>st</sup> Fire Battalion Chief: 4/16/18
- Police Chief: 4/17/18
- Director of EDNR: 4/19/18
- 2<sup>nd</sup> 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: \_\_\_\_\_

## **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 determination of 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? 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](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](mailto:limitedenglishproficiency@hud.gov).

The Lancaster County Coalition to End  
Homelessness

# CONTINUUM OF CARE PERFORMANCE STANDARDS AND POLICIES

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

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

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

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

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# LANCASTER COUNTY, PENNSYLVANIA

## CONTINUUM OF CARE PERFORMANCE STANDARDS AND POLICIES

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

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

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

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

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

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

## II. Written Standards for CoC Assistance

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

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

iii. Assessments

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

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

c. Transitional housing

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

d. Rapid Re-housing

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

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

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

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



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

- 5. Prompt written notice of the final decision to the program participant; and
  - iii. When terminating hard-to-house populations programs must exercise judgment and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that a program participant's assistance is terminated only in the most severe cases.
  - iv. Termination under this section does not bar the recipient or sub recipient from providing further assistance at a later date to the same family or individual.
  - v. Clients may use the LCCEH client grievance policy (Appendix C) to appeal terminations after the provider's process has been completed.
  - i. Plain Language:
    - i. All policies provided to consumers and all forms signed by consumers must be tested for and pass "plain language" testing and be available in both English and Spanish. Guidance on how to test policies is located here: <http://www.plainlanguage.gov/howto/guidelines/FederalPLGuidelines/usability.cfm>
- III. Grievance and Appeals Policy
- Please see Appendix C for the Grievance and Appeals Policy for clients and the Grievance and Appeals Policy for organizations receiving government funding.
- IV. Consequences of Not Meeting Standards
- a. Failure to meet the established standards shall trigger a review by the Lead Agency. This monitoring visit will provide technical support and guidance to improve performance standards. Organizations must show the efforts that they have undertaken to meet the standards. If the organization continues to fail to meet the performance standards established herein, despite technical assistance, funding reductions in future applications will occur.
- V. Appendices
- A. Description of Barrier Levels
  - B. File Documentation Requirements
  - C. Appeals - Grievance Form
  - D. Eligibility for HUD Benefits for Non-Citizens
  - E. Prioritization Policy
  - F. Rapid Re-Housing Performance Benchmarks and Program Standards
  - G. Annual Performance Measures
  - H. Homeless Verification Documentation

## Appendix A

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

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



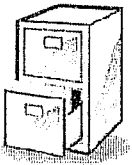
# Homeless Definition

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



# Homeless Definition

## RECORDKEEPING REQUIREMENTS



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



# At Risk of Homelessness

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"> <li>(i) Has an annual income below <u>30%</u> of median family income for the area; <u>AND</u></li> <li>(ii) Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; <u>AND</u></li> <li>(iii) Meets one of the following conditions: <ul style="list-style-type: none"> <li>(A) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; <u>OR</u></li> <li>(B) Is living in the home of another because of economic hardship; <u>OR</u></li> <li>(C) Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; <u>OR</u></li> <li>(D) Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; <u>OR</u></li> <li>(E) Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; <u>OR</u></li> <li>(F) Is exiting a publicly funded institution or system of care; <u>OR</u></li> <li>(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved Con Plan</li> </ul> </li> </ul>
	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.



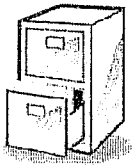
# Homeless Definition

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



# Homeless Definition

## RECORDKEEPING REQUIREMENTS



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





# At Risk of Homelessness

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"> <li>(i) Has an annual income below <u>30%</u> of median family income for the area; <u>AND</u></li> <li>(ii) Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; <u>AND</u></li> <li>(iii) Meets one of the following conditions: <ul style="list-style-type: none"> <li>(A) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; <u>OR</u></li> <li>(B) Is living in the home of another because of economic hardship; <u>OR</u></li> <li>(C) Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; <u>OR</u></li> <li>(D) Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; <u>OR</u></li> <li>(E) Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; <u>OR</u></li> <li>(F) Is exiting a publicly funded institution or system of care; <u>OR</u></li> <li>(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved Con Plan</li> </ul> </li> </ul>
	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.

# Appendix C

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

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

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

Section 214 regulates the following HUD funded programs:

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

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

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

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

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

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

The full text of this law can be found at:

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

# Appendix D

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

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

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

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

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

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

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

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

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

- **Programs necessary for the protection of life and safety**, as long as they pass the following "three-prong test," do not need to verify 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](http://www.lcceh.org).

**Lead Based paint** requirements are listed at 24 CFR 576.403(a). The Lead-Based Paint Poisoning Prevention Act ([42 U.S.C. 4821-4846](#)), 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.<sup>1</sup> As rapid re-housing practice continues to evolve, these program standards will be updated. This living document is intended to be a tool to help current and potential rapid re-housing providers, funders, and other stakeholders design and identify rapid re-housing programs that are or are likely to be the most successful in ending homelessness for individuals and families through the use of the three core components of rapid re-housing.

### How to Use this Document

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

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

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

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

## Performance Benchmarks

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Core Component Program Standards

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

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

### *Housing Identification*

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

#### Principles

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

#### Rationale

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



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

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

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

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

#### *Program Staffing*

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

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

#### *Program Policies*

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

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

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

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

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

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

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

#### *Program Activities*

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

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

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

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

### Examples of Meeting Program Standards: Housing Identification

Programs that meet the above standards include those that:

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

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

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

### **Principles**

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

### **Rationale**

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

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

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

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

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

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

### *Program Policies*

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

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

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

### *Program Activities*

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

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

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

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

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

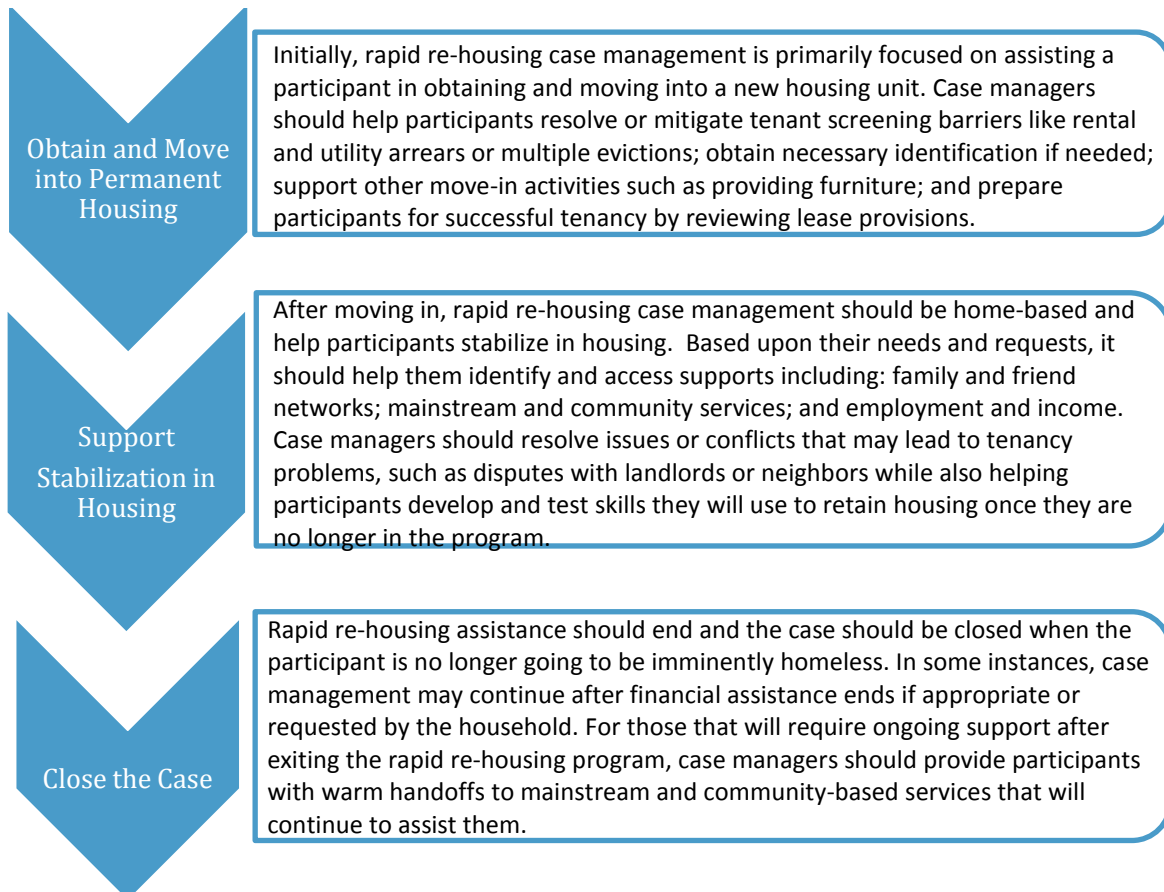
### Examples of Meeting Program Standards: Rent and Move-In Assistance

Programs that meet the above standards include those that:

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

## *Rapid Re-housing Case Management and Services*

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



## **Principles**

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

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

## **Rationale**

Rapid re-housing is a short-term crisis intervention. As such, the intent of rapid re-housing case management is not to build a long-term services relationship, but instead to assist a household in accessing and stabilizing in a housing unit. Because of that, case management focuses on navigating barriers to tenancy and helping participants to build a support system. It does the latter by identifying and connecting them with community supports, including services and mainstream resources as well as family and friend networks so they have support to work through issues that may have contributed to their original housing instability. Programs should not initially assume all participants need multiple services, but wait until a need is demonstrated and/or expressed by the participant. Staff should be able to increase supports as needed to help program participants. In instances when a 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.<sup>2</sup> Rapid re-housing programs should not attempt to screen out households based on a score on an assessment tool or criteria that are assumed, but not shown, to predict successful outcomes, such as a minimum income threshold, employment, absence of a criminal history, evidence of “motivation,” etc.
- Rapid re-housing participants should have all the rights and responsibilities of typical tenants and should sign a standard lease agreement.

### Rationale

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

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

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

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

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

### *Program Staff*

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

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

### *Program Policies*

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

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

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

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

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

### *Program Activities*

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

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

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

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

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

Programs that meeting the above standards include those that:

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

# Appendix G

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

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

### Permanent Destinations\*

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

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

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

#### Temporary Destinations

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

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

#### Other Destinations

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

#### Institutional Setting

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



## The Lancaster County Coalition to End Homelessness

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

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

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

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

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

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

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

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

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

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

Thank you,

Jen Koppel

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