

# 2021

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**The City of Lancaster, Pennsylvania**

**C**onsolidated  
**A**nnual  
**P**erformance and  
**E**valuation  
**R**eport

**Prepared for the Department of Housing and Urban Development (HUD)**



**CITY OF  
LANCASTER**

**Department of Community Planning & Economic Development**

Lancaster, Pennsylvania  
Municipal Building  
120 North Duke Street  
Lancaster, PA 17602

[www.cityoflanasterpa.com](http://www.cityoflanasterpa.com)

**Danene Sorace, Mayor**

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## CR-05 – Goals and Outcomes

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

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

In 2021, the City dedicated itself to addressing the following primary goals that were identified as priority community needs and established for its CDBG and ESG programs from 2021 - 2025:

1. Maintain Affordable, Good Quality Housing
2. Increase Affordable Housing Opportunities
3. Promote Neighborhood Quality of Life
4. Expand Economic Opportunities
5. Support Homelessness Services

Accomplishments for these goals are stated in the Table 1, below.

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

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

Goal	Category	2021 – 2025 Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Expand Economic Opportunities	Non-Housing Community Development	CDBG: \$547,793.00	Businesses assisted	Businesses Assisted	80	0	0.00%	20	0	0.00%
Expand Economic Opportunities	Non-Housing Community Development		Housing Code Enforcement/Foreclo sed Property Care	Household Housing Unit	100	0	0.00%	100	0	0.00%

Homeless Services	Homeless	ESG: \$728,395.00	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	200	78	39.00%	40	78	195.00%
Homeless Services	Homeless		Homeless Person Overnight Shelter	Persons Assisted	200	78	39.00%	40	78	195.00%
Increase Affordable Housing Opportunities	Affordable Housing	CDBG: \$1,914,243	Other	Other	60	0	0.00%	2	0	0.00%
Maintain Affordable, Good Quality Housing	Affordable Housing	CDBG: \$3,577,792	Rental units rehabilitated	Household Housing Unit	50	1	2.00%	10	1	10.00%
Maintain Affordable, Good Quality Housing	Affordable Housing		Homeowner Housing Rehabilitated	Household Housing Unit	50	38	76.00%	10	38	380.00%
Maintain Affordable, Good Quality Housing	Affordable Housing		Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	3000	1109	36.97%	600	1109	184.83%
Promote Neighborhood Quality of Life	Non-Housing Community Development	CDBG: \$2,557,793	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10000	32065	320.65%	1000	32065	3,206.50%
Promote Neighborhood Quality of Life	Non-Housing Community Development		Public service activities other than Low/Moderate	Persons Assisted	10000	550	5.50%	1000	550	55.00%



			Income Housing Benefit							
Promote Neighborhood Quality of Life	Non-Housing Community Development		Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	400	359	89.75%	80	359	448.75%

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

<b>CDBG-CV Goal</b>	<b>Category</b>	<b>CDBG-CV Funding Allocated</b>	<b>Outcome</b>	<b>Expected</b>	<b>Achieved</b>	<b>%</b>
CV - Emergency Rental Assistance	Affordable Housing	\$450,000 - CDBG-CV	Households Housing Unit Assisted	250	129	51.60%
CV – Public Health Services	Non-Housing Community Development	\$502,939 - CDBG-CV	Persons Assisted	12,585	82,132	652.56%
CV – Economic Recovery and Development	Non-Housing Community Development	\$250,000 - CDBG-CV	Businesses Assisted	150	1,034	689.33%

**Table 2 - CDBG-CV 2021 Accomplishments**

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

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

## **Goal 1: Maintain Affordable, Good Quality Housing**

### ***The Housing Code Enforcement Program Activity***

The Housing Code Enforcement Program is designed to improve the health and safety conditions of City homes to prevent deterioration of the City's housing stock, to help maintain affordable, good quality housing, and to stop the spread of blight, particularly in areas principally occupied by low-income persons. The City committed \$358,000 of its 2021 CDBG dollars to this program which helped leverage City general fund dollars, allowing this activity to continue to operate proactively to address the City's critical health-related housing issues. In 2021, this service contributed to the preservation and improved the quality of affordable housing with a focus on homes in low and very-low-income census tracts in the some of City's income-constrained areas such as Census Tracts 9, 8, 10, 14, and 147. Specifically, proactive code enforcement activities were undertaken with 1,109 rental properties brought successfully up to code to help improve the quality and safety of housing in predominately disadvantaged and deteriorating neighborhoods through the correction and resolution of 834 violations and 275 systematic inspections, providing overall direct and indirect benefits to residents of the Service Area. As such, this activity enhanced the quality of affordable housing in the City and contributed to the City's goal of maintaining affordable, good quality housing.

In 2021, the City also provided the following improvements and services through this program within the Code Enforcement Area:

- (1) Completed neighborhood outreach efforts in conjunction with the Mayor and City staff to provide education to the public on housing responsibilities and the importance of correcting violations and abating issues of concern to promote the socioeconomic wellbeing of the community.
- (2) Conducted a Housing Condition Survey that rated each individual parcel and dwelling to determine property viability. A total of 18,656 properties were evaluated in the City of Lancaster over the course of several months to compile an accessible database consisting of a current assessment of the conditions of the City's housing stock to inform strategic code enforcement programs and priorities.
- (3) Achieved program success on the 500 block of Chester Street and the first block of Hazel Street through systematic inspections resulting in successful resolution of findings that are helping to improve the quality of the housing stock in the area.

### ***The Critical Repair Program, Lead Hazard Control Program, and the Critical Repair and Lead Hazard Control Program Administration Activities***

In 2021, the Critical Repair Program, Lead Hazard Control Program, and Critical Repair and Lead Hazard Control Program Activities leveraged remaining 2017, 2018, 2019, and 2020 CDBG dollars to help fund affordable housing preservation projects that were delayed as a result of operational and supply chain constraints exacerbated by COVID-19. These programs provided essential financial and technical assistance to reduce or eliminate lead hazards in housing and to

address necessary, emergency critical repairs for eligible, owner-occupied, single family housing units in designated low- and moderate-income neighborhoods (Census Tracts 9, 10, 14, and 147) while also supporting the administration of both programs. Low- and moderate-income beneficiaries received specialized professional support to reduce lead hazards found in the home through a Risk Assessment to make the home lead safe. Beneficiaries also received emergency critical home repairs, as needed, to include replacement of water heaters, broken sewer pipes, and non-operable furnaces, roof repair/replacement, and rectification of structural, plumbing, and/or electrical problems. In 2021, the City utilized CDBG funding to make 31 homes lead-safe and provided critical repairs to 21 households. A total of 52 projects took place at 39 household units. 56.41% percent of households assisted were very-low income, 12.82% were low-income, and the remaining 30.77% were moderate-income. These programs increased the affordability of homeownership to its direct recipients, preventing homeowner displacement and improving the wellbeing and health outcomes of beneficiaries. They also provided a service to the surrounding homes through increasing property values, ensuring housing stability, and contributing to the conservation of affordable, good quality housing in the City.

## **Goal 2: Increase Affordable Housing Opportunities**

### ***The Affordable Housing Development Solutions Activity***

The City is committed exploring, implementing, and investing in opportunities to increase affordable housing for its community members leveraging all resources available. The City has allocated \$429,362 of 2021 CDBG entitlement funding to use for furthering this effort. In an effort to avoid duplication of services and to coordinate this activity with other affordable housing funding sources such as HOME-ARP, the City has delayed implementation of this activity until 2022. In 2022, the City plans on releasing an RFP seeking solutions and leveraging additional funding sources, that might include construction of new housing, housing counseling, homeownership assistance, and acquisition or rehab of existing housing, for the purposes of increasing affordable housing opportunities for residents.

In 2021, the City utilized \$24,375.00 in 2019 CDBG administrative and planning monies to fund a City-oriented Housing Affordability Study conducted by the Foundation of the Economic Development Company of Lancaster County's Center for Regional Analysis that will be used to help inform its approach to developing solutions under this activity to rectify the City's affordable housing shortage.

## **Goal 3: Promote Neighborhood Quality of Life**

### ***The Fair Housing Activity***

The Fair Housing Services Activity promotes the provision of fair and equal housing opportunities in the City of Lancaster regardless of a person's race, color, religion, age, sex, ancestry, national origin, disability, or familial status in accordance with City, County, State, and

Federal Fair Housing and Landlord Tenant laws. This is being accomplished through education, outreach, training and technical assistance to address impediments identified in the 2021 Analysis of Impediments to Fair Housing Choice. \$20,000 of the City's 2021 CDBG dollars were committed to and are helping to fund this program from July 1, 2021 to June 30, 2022. Tenfold's Housing Rights and Resources Center (HRRC) is the principal entity tasked with furthering Lancaster's fair housing provision through education, mediation, and outreach efforts to eliminate barriers to fair housing opportunities in the area. In 2021, the HRRC utilized a portion of the City's CDBG dollars to accomplish following outcomes:

- Completed 299 Landlord/Tenant consultations, resolving issues related to housing rights, Fair Housing law, and landlord/tenant issues.
- Conducted Community Outreach Efforts, sharing materials and information by engaging with community members through workshops and information sharing events and informal visits with community members, housing providers, and government stakeholders. HRRC conducted 50 outreach efforts and developed and delivered a Rental Advantage Course to community members.
- Hosted 11 Fair Housing workshops.
- Provided technical assistance on Fair Housing issues including facilitating mediations for seven (7) individuals and assisting in submitting Fair Housing complaint questionnaires to the proper City and/or State enforcement entities, as needed.
- Developed, Produced, and Distributed of Landlord & Tenant Fair Housing Guide: A total of 1,942 guides were distributed in the community supported by 2021 CDBG funding. In this period, Tenfold began to electronically host this guide on its website, which has since been viewed over 1,000 times. The guide was also translated into Simplified Chinese, French, Amharic, and Pashto to promote improved information availability and accessibility.

A total of 299 City residents were served through this activity in 2021, with 58.19% considered to be very-low, low- or moderate-income, and received direct housing support services from the HRRC. These services included providing fair housing rights information and guidance to landlords and tenants on eviction, implied warranty, harassment and intimidation, refusal to rent, security deposits, lease terms and conditions, request for housing, and home buying/selling.

### ***The Place-Based Streetscape Improvements Activity***

The City's Place-Based Streetscape Improvement Program installs, improves, and repairs streets, street drains, storm drains, ADA curbs and gutters, sidewalks, crosswalks, streetscapes, and traffic lights/signs in neighborhoods where 51% or more of the residents are low- or moderate-income in an effort to improve and promote neighborhood quality of life and increase the economic viability and livability of socioeconomically disadvantaged areas of the City.

In 2021, this activity provided improvements and rehabilitation to selected segments of streets in targeted areas of low- and very-low-income neighborhoods (Southside, Churchtowne, and

Musserstown) through implementing block level street improvement projects comprised of tree planting and stormwater improvements, sidewalk and pavement restoration and expansion, and street safety enhancements to the benefit of predominately low- and moderate-income households. \$225,000 2021 CDBG dollars were committed to the Place-Based Streetscape Improvements Program. This money assisted in funding the costs of two (2) projects along areas of critical need: (1) Howard Avenue and (2) Highland Avenue. For project-specific 2021 outcomes, please see below:

- (1) Howard Avenue (from King Street to Queen Street): In 2021, this activity enhanced the quality of life of the residents of the Howard Avenue neighborhood by providing improvements to streets, sidewalks, curbs, crosswalks, ADA ramps, and the streetscaping of the area. Specifically, approximately 2,900 LF (9,732 SY) of paving was completed, 16 trees were planted, three (3) ADA ramps were added, approximately 24 piano key crosswalks totaling 768 LF of thermoplastic markings were installed, 2118.50 SF of brick sidewalk and 3,638.75 SF of sidewalk were restored, and 515.5 LF of curbs were replaced. As a local, urban road, it has been determined that all residents in Census Tract 9, Block Groups 1 – 4, which Howard Avenue runs through, realize the positive impacts of these street improvements in the form of an increased sense of safety, walkability, and access to their community space. Based on the Service Area, a total of 3,475 people see a benefit from this activity, which supported improvements to an area that is 83.60% Low Mod Income (according to the LMISD HUD Prescribed 2011 - 2015 ACS Data) and is 86.98% residential.
- (2) Highland Avenue (from Greenwood Avenue to Furnace Street): In 2021, this activity promoted the quality of life of the residents of the Highland Avenue neighborhood by improving sidewalks and pavement, installing stormwater and drainage facilities, signage, and traffic devices, expanding ADA accessibility, and revitalizing crosswalks. This project is part of a larger Green Infrastructure effort spearheaded by the City to create livable, sustainable neighborhoods for residents and to reduce combined sewer overflows. Specifically, this project consisted of vegetative curb extensions, installation of stormwater storage/infiltration trenches, non-stormwater landscaped curb extensions, provision of new signage and traffic devices, and the installation of four (4) ADA curbs ramps and four (4) piano key crosswalks. The project also provided paving of the areas of Highland Ave where stormwater facilities were installed. As a principle, interstate arterial road serving as a major access point to the City, it was determined that all residents in census block groups within a one (1)-mile radius through which Highland Avenue (Route 222) runs through stand to realize positive impacts of the improved pavements and curbs with better stormwater retention and drainage capabilities, clearer signage and new traffic devices, and safer, more inclusive pedestrian crosswalks with ADA accessibility that provide an improved sense of security allowing reliable access to a more sustainable community space. Based on this determination, a total of 32,065 people likely experience the benefits of this activity, which is serving a community that is 73.71% Low Mod Income (according to the LMISD HUD Prescribed 2011 - 2015 ACS

Data) and 86.12% residential.

In total, this program contributed to improving neighborhood quality of life by increasing the number of public infrastructure improvements for the 32,065 City residents who live, work, travel, and commute on and through these streets by all modes of transportation.

### ***The Neighborhood Crime Reduction through Police Social Worker Activity***

The City dedicated \$87,928.00 of 2021 CDBG funding to assist the Neighborhood Crime Reduction Through Police Social Worker Program in supporting a community-oriented, holistic policing program aimed at preventing crime through engagement and connection in order to proactively assist City residents in need by connecting them to appropriate social services or behavioral or mental health providers. This has resulted in a reduction in repeat calls for Police and more positive interactions between Police and residents, ultimately decreasing crime and increasing awareness and access to essential support services within the community. During the 2021 Program Year, this program assisted 550 Service Area beneficiaries by resolving police-involved issues related to homelessness, wellbeing, mental health, aging, housing, child welfare, and domestic violence. This has helped to improve police-led community outcomes and enhance neighborhood quality of life to the benefit of a predominately low- and moderate-income City area.

### ***The Housing Social Worker Activity***

The Housing Social Worker activity is responsible for providing social service and housing support to the City of Lancaster's Community Planning and Economic Development Department (CPED) and members of the community through managing a caseload focused on addressing problems related to housing and resident wellbeing. Delayed on 2020 due to recruitment issues and operational constraints related to COVID-19, this program commenced in August of 2021. From August 2021 to December 2021, the Housing Social Worker assisted 60 City-clientele in resolving persistent housing-related issues and in finding and securing affordable housing opportunities in the City, with 83.33% of the beneficiaries assisted being low-and moderate-income. The Housing Social Worker successfully acted as a liaison between the City and the various social service agencies by providing follow-up and monitoring of cases related to housing issues through a holistic, coordinated community response that connected clientele to a variety of agencies to address intersecting socioeconomic issues related to housing, as appropriate. This activity actively contributes to furthering the City's goals to utilize CDBG to promote neighborhood quality of life and to also increase access to affordable housing opportunities.

## **Goal 4: Expand Economic Opportunities**

### ***The Small Business Development Activity (Microenterprise Development)***

The Small Business Development Activity offers small business training, mentoring, access to

financial tools, and other technical assistance to lower-income City residents who wish to establish or expand microenterprise businesses. Participants attend business-oriented training courses and receive targeted technical skill building and coaching to create and implement sustainable microenterprise business models. Applicants successfully completing the ASSETS training are eligible to apply for microenterprise loans and financial assistance through various local and State-supported funding mechanisms. All attendees receive continuous technical assistance and support after graduation. \$20,000 2021 CDBG dollars were committed to help fund this program, aimed at improving the economic development services and outcomes for low- and very-low-income persons. This activity runs from July 1, 2021 through June 30, 2022. As such, tangible beneficiary outcome and accomplishment data will be reported at the conclusion of the program. The City anticipates that at least 20 predominately low- and moderate-income individuals developing or expanding microenterprises will be assisted by this activity.

#### **Goal 5: Support Homelessness Services**

Through the joint funding application process, the City worked with homeless service providers who met the growing need for emergency shelter, outreach, and rapid rehousing services. This project also covers 7.5% in administrative costs of the ESG program. In 2021, 78 beneficiaries were served by the Rapid Housing, Emergency Shelter, and Outreach ESG activities.

### **2021 CDBG-CV ACTIVITIES**

In 2021, the City continued to address pressing community needs arising from the Coronavirus Pandemic (COVID-19) by utilizing its 2020 CDBG Coronavirus Aid, Relief, and Economic Security (CARES) Act (CDBG-CV) allocations to prepare for, prevent, and respond to COVID-19. Below is a summary of the 2021 Program Year activities undertaken by the City utilizing this funding to support this effort.

#### **CDBG-CV Goal: Emergency Rental Assistance**

##### ***The Eviction Prevention Network – Rental Assistance Activity***

The Eviction Prevention Network – Rental Assistance Activity provided one-time or short-term emergency payments on behalf of individuals or families for the purposes of keeping residents in stable housing to offset the harmful economic impacts of the pandemic. This activity specifically provided emergency rent/mortgage payments to prevent eviction and homelessness.

During 2021, this activity provided emergency rental subsistence payments to 120 people in the City of Lancaster who were adversely impacted by the COVID-19 pandemic in order to respond to the adverse economic impacts of COVID-19. In total, this activity served clientele who were 96.1% low- and moderate-income and helped to ensure that City residents were able to maintain access to affordable housing.

### ***The Eviction Prevention Network – Utility Subsistence Activity***

The Eviction Prevention Network – Utility Subsistence Activity provided one-time or short-term emergency payments on behalf of individuals or families for the purposes of keeping residents in stable housing to prevent, prepare for, and respond to the adverse economic impacts of COVID-19. This activity specifically provided emergency utility payments to prevent cutoff of service, eviction, and homelessness to sustain housing stability and wellbeing for City residents rendered vulnerable by the economic effects of the pandemic.

During 2021, the subrecipient provided emergency utility subsistence payments on behalf of nine (9) extremely low-income households comprised of a total of 20 people within the City of Lancaster. This activity served a direct clientele base that was comprised on 100% very-low-income beneficiaries and helped to ensure that City residents were able to maintain access to affordable housing despite COVID-19.

### **CDBG-CV Goal: Public Health Services**

#### ***The City Health Worker for COVID-19 Support Activity***

In an attempt to prevent, prepare for, and respond to COVID-19, the CDBG-CV City Health Worker for COVID-19 Support activity identified vulnerable and low- and moderate-income neighborhoods to focus efforts to provide education and outreach for COVID-19 vaccinations, perform pandemic-related education, and conduct a community health needs assessment.

During 2021, the City Health Worker accomplished the following:

- Provided 284 individuals with their first dose of the COVID-19 vaccine;
- Provided 564 individuals with their second dose of the COVID-19 vaccine; and,
- Delivered COVID-19 vaccine educational sessions with medical providers to 142 individuals.

During this period, the City Health Worker spent time collaborating with several internal departments and key personnel within the City of Lancaster, such as the Community Planning and Economic Development team, the Department of Neighborhood Engagement team, and the City Mayor, to develop a COVID Health Needs Assessment for residents living in the CDBG target area. In total, 9200 surveys were prepared and mailed out at random, with 562 surveys completed. As the period of performance for this activity extends until June 30, 2022, survey data will be analyzed and results will be reported in 2022. This program helps to improve the neighborhood quality of life for City residents while also providing support for their physical health needs to help combat the spread of COVID-19.

#### ***The Mobile Hygiene Unit Activity***

Starting in December of 2021, The Mobile Hygiene Unit Activity has been providing public health services to members of the Lancaster City community experiencing homelessness to



prevent, prepare for, and respond to the adverse health impacts of the COVID-19 pandemic through the provision of showers to address hygiene needs and medical care to promote improved wellbeing of this vulnerable population. During 2021, the MHU served seven (7) beneficiaries who have been negatively impacted by COVID-19, providing showers and medical care, encompassing blood pressure checks, blood glucose monitoring, medication reconciliation, care coordination with Primary Care Physician (PCP), assessing feet and obtaining dry shoes to alternate with current pair to prevent cracked and painful wounds to feet. Notable successes include care coordination resulting in establishing and connecting with new PCPs, distribution of chronic disease management education, multiple referrals made to community resources, hygiene, and clothing distribution. This activity is contributing to improving the health and wellbeing of the City's most vulnerable residents while also stemming the negative health impacts of the pandemic and preventing the further spread of COVID-19.

### ***Public Service Outreach Specialist***

The Public Service Outreach Specialist, a collaboration with the Lancaster City Alliance, is responsible for circulating throughout the Downtown District, surrounding neighborhoods and parks, conducting outreach to community members in need of assistance and providing connection to pertinent social services that holistically address complex socioeconomic challenges exacerbated by the impact of COVID-19.

In 2021, this activity provided direct support and referrals to community members in need for resources and services structured to deal with their situation with the aim of preparing for, preventing, and responding to the COVID-19 pandemic. During 2021, starting in August and ending in December 2021, the Public Service Outreach Specialist engaged with and assisted 57 individuals requiring outreach services within the specified Service Area. As a result of the outreach work funded by this activity, a total of 15 individuals received COVID-19 vaccinations and 27 individuals were connected to health services to assist with the health-impacts of the pandemic. Additional connections to homelessness services, housing, rental relief, hygiene support, food and clothing access, substance abuse services, and job training support were made during 2021. This activity contributes to addressing the health and social needs of the community as a result of COVID-19 and works to improve wellbeing and quality of life for residents in need.

## **CDBG-CV Goal: Economic Recovery and Development**

### ***Building Codes for COVID-19 Support***

In 2021, this activity supported property inspections and follow-up actions directly related to the enforcement (not correction) of state and local building codes. Work was conducted and completed predetermined predominately low/moderate-income area within the South Quadrants of the City, in Census Blocks 14, 10, 11, 9, 8, 12, and 147. This activity is designed to primarily benefit low- and moderate-income households in deteriorating and socioeconomically disadvantaged areas of the City unduly impacted by the effects of the COVID-19 pandemic in an

effort to promote economic revitalization and prevent economic decline through funding proactive building code enforcement. This activity supported businesses making building improvements, including those related to incorporating COVID-19 precautions through building design, by ensuring compliance with state and local building codes. Additionally, this activity helped ensure businesses, especially essential businesses, continue operating safely in their physical locations and to prevent buildings not occupied due to remote work from falling into decline. During the 2021 Program Year, the Building Codes for COVID-19 Support completed 1,034 building code inspections on properties in a predominately low- and moderate-income Service Area in the South of the City during 2021 comprised of 75.18% LMI households, resulting in improvements to the social and economic fabric of the area and neighborhood quality of life unduly impacted and exacerbated by the COVID-19 pandemic.

DRAFT

## CR-10 – Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

Race	CDBG	ESG
White	243	240
Black or African American	111	92
Asian	3	0
American Indian or American Native	0	2
Native Hawaiian or Other Pacific Islander	1	0
Black or African American, & White	1	0
Other Multiracial	72	30
Unable to Obtain	114	11
<b>Total</b>	<b>545</b>	<b>375</b>
<b>Ethnicity</b>		
Hispanic	168	106
Not Hispanic	307	267
Unable to Obtain	0	11

**Table 3 – Table of assistance to racial and ethnic populations by source of funds**

### Narrative

These statistics only include data from CDBG & ESG activities that were performed in 2021 and provided a direct benefit to specific households. These activities include:

1. The Critical Repair and Lead Hazard Reduction Program Activities
2. The Fair Housing Services Activity
3. The Housing Social Worker Activity
4. The Mobile Hygiene Unit (CDBG-CV)
5. The Eviction Prevention Network – Rental Assistance Activity (CDBG-CV)
6. The Eviction Prevention Network – Utility Subsistence Activity (CDBG-CV)
7. Tenfold Outreach
8. Tenfold Rapid Rehousing
9. YWCA Emergency Shelter

Please see CR-05 - *Goals and Outcomes* for more information on the impact of the indirect services provided to city residents. Additionally, please see the below image entitled *Demographics of the City of Lancaster, PA (2021 Census Data)* for more specific information about the racial and ethnic composition of the City.

Race and Hispanic Origin	
White alone, percent	59.8%
Black or African American alone, percent (a)	17.2%
American Indian and Alaska Native alone, percent (a)	0.2%
Asian alone, percent (a)	4.4%
Native Hawaiian and Other Pacific Islander alone, percent (a)	0.1%
Two or More Races, percent	6.7%
Hispanic or Latino, percent (b)	38.3%
White alone, not Hispanic or Latino, percent	40.1%

**Image 1 - Demographics of the City of Lancaster, PA (2021 U.S. Census Bureau Data)**

## CR-15 – Resources and Investments 91.520(a)

### Identify the resources made available

Source of Funds	Source	Resources Made Available in 2021	Amount of 2021 Funding Expended During Program Year
CDBG	Public - Federal	\$1,744,127	\$540,501
ESG	Public - Federal	\$145,679	\$0
CDBG-CV	Public - Federal	\$1,552,939	\$584,583

**Table 4 - Resources Made Available**

#### Narrative

2021 CDBG and ESG funds were subcontracted to subrecipients for the period of July 1, 2021 – June 30, 2022. The above CDBG & ESG expenditures represent half of the contract period. The remaining funds will be obligated and/or expended during 2022 for activities detailed in the City's 2021 – 2025 Consolidate Action Plan and 2021 Annual Action Plan. Due to remaining ESG funds from prior years and the influx of additional CV monies, the City opted to utilize funds from prior years before accessing 2021 ESG funds.

Included in this table under "Other" are the CDBG-CV resources made available and expended in the 2021 Program Year. The City plans to utilize the remaining CV funding in 2022 to address and rectify pervasive community health and social needs that have emerged as a result of the pandemic.

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
LANCASTER CITY	100	100	All funds were spent in the City of Lancaster, focusing on low- and moderate-income beneficiaries.

**Table 5 – Identify the geographic distribution and location of investments**

#### Narrative

100% of the 2021 CPD funds were spent in the City of Lancaster, with a focus on primarily benefitting predominately low- and moderate-income areas and beneficiaries.

## **Leveraging**

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

The City continues to utilize Federal CDBG and ESG funding to leverage private, state, and local funding sources. CDBG funds supplemented a variety of programs that have other sources of funding. The Place-Based Streetscape Improvements program used other state grant funds such as a Keystone Grant as well as City Capital Improvement funds. The Critical Repair and Lead Hazard Control Programs leveraged the City's \$700,000 Healthy Homes Supplemental funding and a \$9.1M Lead Hazard Reduction Grant from the Department of Housing and Urban Development (HUD) to deliver holistic, impactful approaches to strengthen the City's affordable housing stock and resident wellbeing. The City of Lancaster's internal operating funds also supplemented the Housing Code Enforcement Program, the Building Codes Program (CV), and the Neighborhood Crime Reduction through Police Social Workers Program.

The CDBG funds used for the Small Business Development (Microenterprise Development) program represented less than 5% of their total program budget (the majority of their budget is comprised of privately raised funds). The Fair Housing Program also receives private funds, in addition to state and local funds, and County CDBG assistance.

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

Publicly owned property was used to host several core programs that directly address the needs identified in this plan; specifically, City Hall (120 North Duke Street - owned by the City of Lancaster) hosts the City's Housing and Building Code Enforcement Programs, Critical Repair Program, Lead Hazard Control Program, the Place-Based Streetscape Improvement Activities' Administration and Management Team and Community Development staff. Other than the above-listed use, publicly owned property and land were not used to address the needs identified in the plan.

## CR-20 – Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	40	78
Number of Non-Homeless households to be provided affordable housing units	375	527
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>415</b>	<b>605</b>

**Table 6 – Number of Households**

	One-Year Goal	Actual
Number of households supported through Rental Assistance	370	566
Number of households supported through The Production of New Units	2	0
Number of households supported through Rehab of Existing Units	20	39
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>392</b>	<b>605</b>

**Table 7 – Number of Households Supported**

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

In 2021, the City generally met or exceeded the goals and outcomes it had established to further affordable housing, with the exception of the goals it had set for the 2021 Affordable Housing Development Solutions Activity and the CDBG-CV-assisted Eviction Prevention Network activities. The Affordable Housing Development Activity was stalled in 2021 as the City has determined it will leverage the monies with other funding sources, such as ARPA, and HOME-ARP in 2022 in order to maximize impact. The City is planning to begin the necessary planning, engagement, and contracting functions to further progress during the 2022 Program Year in coordination with the planning processes for the aforementioned funding sources. The CDBG-CV Eviction Prevention Activities, Rental Assistance and Utility Subsistence, directly helped 129 households of their 250 intended beneficiaries, amounting to a 51.60% accomplishment rate. This is largely due to the fact they are demand-driven services that require income-qualification to determine eligibility, resulting in a divergence between projected community needs versus actual needs. Further, the City wanted to ensure the availability of adequate financial resources

dedicated to these programs and estimated the beneficiaries at a level necessary to ensure that all eligible and interested City residents could gain access to these essential services which is a major factor contributing the divergence between planned versus achieved outcomes.

The number of households supported through Rapid Rehousing programs were successfully achieved and beyond, out of the anticipated 40 households, we addressed rapid rehousing services for a total of 78 families, a 195% improvement in assisting individuals rapidly exit homelessness and return to permanent housing. Persons assisted with rapid rehousing services benefited from the crisis of homelessness, while it also connected families and individuals with appropriate community resources to address other essential service needs.

**Discuss how these outcomes will impact future annual action plans.**

The City has consistently achieved success in its Fair Housing, Critical Repair, and Lead Hazard Control Programs, which continue to provide tangible, positive outcomes contributing to improving and strengthening accessibility to and availability of sustainable affordable housing opportunities in the City, especially for low- and moderate-income households. Additionally, the City is also realizing success with the Housing Social Worker activity, which assisted 60 City residents in accessing affordable housing, almost three times its initial annual goal of 25 people, in its first four (4) months. As such, the City will continue to support these programs based on their measurable effectiveness and leverage their successes to inform the provision and design of future affordable housing programming.

This City will utilize lessons learned from these programs to operationalize viable and impactful approaches under the Affordable Housing Development Solutions Activity to ensure that our community's housing needs are fully addressed.

The City will continue to support Rapid Rehousing as a method of improving access to affordable housing. In 2021, the City spearheaded a new innovative approach to homeless outreach, emergency shelter, building new affordable housing opportunities, and developing neighborhood based strategies to fight poverty. We hope that these new approaches paired with successful programs fostered from through 2021 will help our low- and moderate-income community members access safe, affordable housing. Additionally, we intend on continuing to monitor the Pathways to MyHome approach closely. We're hoping the new approach will see improvements in outcomes for Lancaster's Rapid Rehousing infrastructure.

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

Number of Households Served	CDBG Actual
Extremely Low-income	195
Low-income	148
Moderate-income	56



Above Moderate-income	9
Unable to Obtain	130
<b>Total</b>	<b>538</b>

**Table 8 – Number of Households Served**

### **Narrative Information**

The above data reflects the number of households served by a direct benefit, affordable housing-related program assisted with CDBG dollars in the 2021 Program Year. This data can be further distilled by income level and activity, included below (please note that some beneficiaries of the Critical Repair and Lead Hazard Control Programs reported below are duplicates):

#### **The Critical Repair Program Activity: 21 Low- and Moderate-Income Beneficiaries (100% LMI)**

- Extremely Low-Income: 13 households
- Low-Income: 3 households
- Moderate-Income: 5 households

#### **The Lead Hazard Control Program Activity: 31 Low- and Moderate-Income Beneficiaries (100% LMI)**

- Extremely Low-Income: 16 households
- Low-Income: 5 households
- Moderate-Income: 10 households

#### **The Fair Housing Services Program Activity: 174 Low- and Moderate-Income Beneficiaries (58.19% LMI)**

- Extremely Low-Income: 39 households
- Low-Income: 100 households
- Moderate-Income: 35 households

#### **The Housing Social Worker Program Activity: 50 Low- and Moderate-Income Beneficiaries (83.33% LMI)**

- Extremely Low-Income: 32 households
- Low-Income: 12 households
- Moderate-Income: 6 households

#### **The Eviction Prevention Network – Rental Assistance Activity: 116 Low- and Moderate-Income Beneficiaries (96.67% LMI)**

- Extremely Low-Income: 82 households
- Low-Income: 31 households
- Moderate-Income: 3 households

#### **The Eviction Prevention Network – Utility Subsistence Activity: 20 Low- and Moderate-Income Beneficiaries (100% LMI)**

- Extremely Low-Income: 20 people/9 households

- Low-Income: 0 households
- Moderate-Income: 0 households

Overall in 2021, the City provided direct benefit to 538 total households through HUD-assisted programming. Specifically, it served 195 very-low-income households, 148 low-income households, and 56 moderate-income households, resulting in a total of 399 low-and moderate-income household who represent 74.16% of the City's total CDBG-supported program clientele, thereby furthering HUD's Community Planning & Development (CPD) Program goal of benefitting predominately low- and moderate-income persons and/or households.

Citizens can also explore the City's work to further affordable housing opportunities at the following website, <https://lanaster-pa.maps.arcgis.com/apps/MapSeries/index.html?appid=5e8866dfe5654c94998e1949e06f123e>, which details relevant investments the City has made in housing projects from 2016 – 2021.

Please see CR-05 - Goals and Outcomes for more information on the impact of all services provided to City residents. Additionally, please see the Attachment entitled *City of Lancaster U.S. Census Bureau Demographic Information (2019 Inflation Adjusted Dollars)* for more information on the City as a whole.

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

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

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

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

The City has substantially increased its outreach efforts to help address homeless and special needs through the implementation of Tenfold's Outreach ESG activity and CDBG activities such as the Public Service Outreach Worker, the Mobile Hygiene Unit, and the Housing Social Worker.

The ESG funds were used for Rapid Rehousing, Outreach Services and Emergency Shelter. Rapid rehousing funds leveraged United Way and FEMA Emergency Food and Shelter Program dollars, as well as other private donations and grants secured by providers. The matching requirements for ESG funds for administration was met by way of the City of Lancaster's CDBG funds. Rapid Rehousing were matched by VA funds, County CDBG funding, the Pennsylvania Coalition Against Domestic Violence, United Way, Continuum of Care funds and other private donations. All matched funds pay for expenses that are eligible under ESG, such as coordinated assessment, street outreach, rental and financial assistance, case management and shelter operations.

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

CHART does the following:

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

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

Emergency Shelter services seek to assist persons that are literally homeless and sleeping on the streets or in places not meant for human habitation are at high risk of physical, mental, financial, and emotional harm to find suitable sleeping accommodations and connect with other appropriate support services.

The Lancaster County Coalition to End Homelessness (LCCEH) continued to monitor the need of emergency and transitional housing. Emergency shelter that can be accessed by any family type and by hard to reach, service resistant individuals were the highest priority to receive funding in 2021 because this is the biggest area of need in the community - in large part exacerbated by COVID-19.

Current City Shelters include: TLC (overnight and day shelter), YWCA (overnight, for women), 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.

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

A critical part of the Lancaster homeless service infrastructure is Outreach. Many outreach clients need not only practical supplies like food, sleeping bags, hygiene items, and face masks, but also case management services such as assistance in filling out SSI or welfare applications, bridging to area resources, or help locating jobs or affordable housing situations.

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.

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

the various levels of the Continuum of Care, including its Homeless Service Provider Network (front-line staff), Continuum of Care Planning Committee (management level staff), Leadership Board (upper management) and Executive Committee (sub-set of Leadership Board). City and County staff also participated at all levels of the Continuum of Care.

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

Rapid re-housing services are the primary method to make the transition to permanent housing and independent living for persons experiencing homelessness. Rapid re-housing helped chronically homeless individuals and families, families the children, veterans and their families to move out of homelessness and into permanent housing as quickly as possible. Tenfold operates two rapid re-housing activity program "Shelter To Independent Living Program" and "Community Housing Solutions" The Shelter to Independent Living Program was funded through the City's 2021 ESG entitlement funds.

The skills and disciplines taught through the provision of rapid rehousing case work services as well and the resources identified in each client's "Housing Plan" worked to prevent formerly homeless persons from returning to homelessness. Self-sufficiency is a primary goal of the program.

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

### **Actions taken to address the needs of public housing**

In 2021, the City worked with the Lancaster City Housing Authority (LCHA) to maintain existing public housing and to continue to look for ways to make more units accessible.

LCHA owns and operates 564 public housing units consisting of 259 family units and 305 elderly/disabled units set in six (6) communities. Housing is also provided through the Section 8 Housing Choice Voucher Program with LCHA administering 1,003 vouchers by matching up eligible applicants with participating private landlords. LCHA also enables area agencies to make accessibility improvements to specific units for their clients.

The City routinely provides technical support and assistance to LCHA in the administration of its public housing programming and serves as the Responsible Entity, specifically supporting the maintenance and rehabilitation of the City's public housing through the Environmental Review process.

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

LCHA's strives to foster the development, ownership, and successful management of the City's public housing programs to empower citizens towards self-sufficiency. LCHA holds residential advisory board meetings to promote resident involvement and homeownership. Tenfold provides housing counseling and homeownership services to low- to moderate-income residents seeking homeownership including public housing tenants and Section 8 voucher holders.

### **Actions taken to provide assistance to troubled PHAs**

The City of Lancaster's public housing authority is not considered a troubled PHA.

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

**Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)**

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

- 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.

The City recognizes the growing challenges in affordability and the need to develop an intentional, collaborative, and impactful housing affordability strategy, policies, and laws that diminish and remove barriers to access and availability. In order to accomplish this, we undertook the following actions in the 2021 Program Year:

The City implemented the Housing Social Worker activity to help reduce barriers to affordable housing by providing a dedicated affordable housing resource that works to connect City residents to better housing opportunities and provides support and education to assist residents in navigating the complex housing and supportive services policies and procedures to enable improved comprehension and access. Further, the City provides Language Access services through a Language Access Coordinator to facilitate equitable information accessibility for the City’s programs and initiatives to meet the language needs of our diverse City population. Additionally, the Housing Social Worker provides bilingual English and Spanish support to further reduce access barriers to affordable housing.

The City also contracted with The Center for Regional Analysis to undergo the development of a core set of data that informs the design and implementation of policies and strategies to address the challenge of housing affordability. This study focused 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 was 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). The study, delivered in October of 2021 and entitled *Housing Availability in the City of Lancaster and Implications for Housing Affordability*, provided critical quantitative, supply and demand analysis providing the necessary contextual foundations from which to develop the City’s affordable housing strategies. The study contributed the following key findings about the City’s housing

affordability:

1. **Finding 1:** The City's housing affordability is impacted by supply and demand dynamics caused by a limited stock and broad spectrum of housing cost burden due to income disparity which create barriers to accessing affordable housing due to market-driven rental costs that are disproportionate to incomes.
2. **Finding 2:** The City has a housing shortage of about 1,165 – 2,455 homes. This contributes to an increase in housing prices, which may cause housing instability and displacement for lower income residents, further aggravating of the City's housing affordability challenge.
3. **Finding 3:** The type of housing available in the City does not meet the needs of the typical City household, generating further housing inequity in terms of housing cost burden for single income earners and small families. The City would therefore benefit from the production and addition of one- and two-bedroom units to its housing stock.
4. **Finding 4:** The City faces limited opportunities to expand its housing supply due its highly residential nature. It should consider adopting transformative policies supporting extensive and deliberate redevelopment at a large scale to combat the housing shortage utilizing land use and zoning mechanisms and promoting rehabilitation and new construction.
5. **Finding 5:** There is an unequal distribution of housing cost burden based on family size and income, creating further housing equity issues in the City. It is estimated that one-third of the City's households are housing cost-burdened with single, nonfamily households, comprising 40% of the City's households, bearing the bulk of this burden. This finding indicates that incomes are insufficient to meet the cost demands of the City's housing market, compounding the City's affordability challenge.

The Housing Affordability Study is helping to inform the direction and nature of land use and zoning changes to be proposed in the upcoming City Comprehensive Plan in addition to the City's affordable housing approaches. This report has been integral to informing the City's Interim Housing Strategy which has set the following goals and actions seeking to diminish the aforementioned barriers to affordable housing to be achieved by 2026:

1. **Goal 1: Produce approximately 2000 new units, 300 of which are affordable**
  - a. Create and implement City, land use, and zoning policies that advance housing supply and focus on rehabilitation of existing buildings, increasing density, and building up instead of out.
  - b. Leverage financial tools like Local Economic Revitalization Tax Assistance (LERTA) and the City Revitalization and Improvement Zone (CRIZ) to stimulate land development



- and attract investment capital for housing and mix-use projects.
- c. Leverage HOME, CDBG, NAP, PHARE, and ARPA funding to help subsidize the development and sustainability of affordable units, as appropriate.

**2. Goal 2: Protect approximately 14,000 existing units, and improve 100+ units**

- a. Utilize proactive and complaint-based inspection and maintenance efforts to promote the provision of safe, high-quality housing to sustain the City's current housing stock. Update the City's Rental Property and Lead ordinances to concentrate resources and inspection efforts based on need and incentivize unit upgrades. Improve landlord outreach and education efforts to facilitate understanding and buy-in.
- b. Continue to provide Lead Remediation and Health Homes Grants to underserved and vulnerable low- and moderate-income households.
- c. Continue to provide Critical Repair Grants and Loans to help disadvantaged homeowners offset the economic hardship caused by emergency repairs to critical household systems and fixtures for low- and moderate-income households.

**3. Goal 3: Acquire approximately 200 units for affordability-focused redevelopment**

- a. Work with the Redevelopment Authority of the City of Lancaster (RACL) to acquire vacant and blighted properties for resale and rehabilitation geared at providing affordable housing to low- and moderate-income households.
- b. Collaborate with the City's Land Bank to purchase properties to be redeveloped as affordable housing by Community Housing Development Organizations.
- c. Promote City-Led conversion, with properties purchased and redeveloped with the goal of creating affordable and mixed-income redevelopment of City-acquired and directed property.
- d. Work with the County and local Continuum of Care (CoC) providers to develop permanent transitional housing facilities offering wrap-around services to support City residents who are transitioning from homelessness to a stable living situation.

**4. Goal 4: Innovate to create approximately 100 new units**

- a. Promote and facilitate the development of home-sharing and community living models, accessory dwelling units, tiny homes, and a reduction of parking requirements, as appropriate, to enable the expansion of, access to, and availability affordable housing opportunities and mechanisms to better align with the City's typical households and support those with lower or fixed incomes.

**5. Goal 5: Sustain existing affordability and neighborhood vitality**

- a. Continue to provide financial support to prevent housing insecurity caused by the impact of COVID-19 to prevent eviction and displacement.
- b. Expand and investigate avenues to assist low-income residents in homeownership through Low-Interest Home Loans and Façade Improvement Grants.
- c. Help low-income residents achieve homeownership and build wealth with mechanisms such as Down Payment Assistance, Live Near Your Work Grants, and the

Tenant Opportunity to Purchase Act.

- d. Continue to contribute resources to strengthen and expand the City's homeless shelter system to better meet the needs of this vulnerable population, including expanding current capacity by 20 – 30 shelter beds and 100 emergency shelter beds.

A copy of both the Housing Affordability Study and the City's Interim Housing Strategy are included as attachments to this report.

Furthermore, the City is also in the process of finalizing its Comprehensive Plan, supported by CDBG administration and planning funds, which is reevaluating the City's approaches to land use, zoning, and other policies related to community, housing, and economic development.

These actions, when combined, are helping to reduce institutional barriers to affordable housing in Lancaster and demonstrate the proactive steps the City is implementing to make affordable housing more accessible for all. The City will continue its work to address housing issues for low- and moderate-income families by funding programs that sustain affordable housing in good condition and increase affordable housing availability and opportunities.

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

The City's Critical Repair Program, Lead Hazard Control Program, and Healthy Homes Program all focus on maintaining owner-occupied housing and addressing deferred maintenance for households under 80% Area Median Income (AMI). In order to alleviate financial burdens for beneficiaries below 50% AMI, the Critical Repair program adjusted its design in 2021 to provide grants for emergency critical repairs in lieu of forgivable loans requiring liens to reduce the risk of aggravating economic injustice. The City's Housing and Building Code Enforcement Programs assisted in ensuring the maintenance of housing, businesses, and buildings throughout the City (with a focus on the rental and business community who often struggle with quality and/or affordability). The City also works with SACA Development Corp. (a qualified CHDO) in their development of affordable housing, particularly in the Southeast area of Lancaster City, which has a concentration of minority and low-income households, on various HOME-assisted initiatives detailed in Lancaster County's Consortium reporting.

Specifically, The City completed the following actions during the 2021 Program Year to address obstacles to meeting underserved needs in our community:

- The Critical Repair and Lead Hazard Control Programs focused on addressing the housing health, wellness, and viability of owner-occupied units, lead-paint testing and remediation, and preservation of the City's affordable housing stock.
- The Fair Housing Services program provided communal education and mediated issues between landlords and tenants to improve City residents' quality of life, their understanding of fair housing rights, and access to affordable housing opportunities and mechanisms.

- The City provided various public service activities to increase access to and utilization of vital social services available in the City, including helping to fund a holistic, resident-centric Police Social Worker Program, a Housing Social Worker dedicated to addressing multifaceted socioeconomic housing challenges of City residents, a City Health Worker who is providing COVID-19 vaccination education, outreach, and preliminary needs assessment activities to improve communal health outcomes, a Mobile Hygiene Unit that is providing health and hygiene services to vulnerable residents to improve communal wellbeing and prevent the spread of COVID-19, and a Public Service Outreach Worker who is serving as a support system for community members experiencing socioeconomic difficulties complicated by the COVID-19 pandemic.
- The Eviction Prevention Network-CV Activities provided emergency rental and utility payments to counteract the negative economic impacts of COVID-19 by preventing housing displacement and reducing incidents of housing insecurity.
- Using ESG funding, the City increased outreach efforts to meet underserved needs and connect residents experiencing homelessness to essential support services.

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

The City of Lancaster administers a Lead-Based Paint program that assists eligible property owners and tenants with reducing and/or abating lead hazards in their properties and is supplemented with CDBG funding.

In 2019, the City was awarded \$9.1M in Lead Hazard Reduction Grant through the U.S. Department of Housing and Urban Development, plus an additional \$700,000 of Healthy Homes Supplemental funding. These dollars will be used to systematically make 710 housing units lead-safe over five (5) years. The funding is enabling the City to scale up its existing Lead Hazard Control Program by hiring additional staff, including outreach workers. The target area encompasses four Census tracts (9, 10, 14, and 147) in the southern half of the City where 16,000 residents live. 61.5% of houses in the focus area were built prior to 1940 and lead-based paint is most likely present in the majority of households within the target area. Over 60% of families in the target area have low incomes and 82.6% of the population is a minority (including 58.6% Hispanic), meaning that this is a problem that is disproportionately affecting the City's most vulnerable populations.

In 2021, 98 properties were addressed by the City's lead programming to reduce lead-based paint hazards. Additionally, the City conducted a community and stakeholder engagement process in Fall of 2021 to develop and update the City's Lead Hazard Control ordinance planned for 2022.

Over the next five years, the City of Lancaster will successfully make 710 housing units lead safe. The Healthy Homes Supplemental Funding is also allowing the City to address other health hazards (such as radon, mold, and tripping hazards) in 120 homes.

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

In 2016, the Mayor's Commission to Combat Poverty released *One Good Job, A Strategic Plan to Cut Poverty in Half in Lancaster City by 2032*. The plan includes recommendations in four (4) areas: Workforce, Education, Housing & Community. Additionally, the Mayor's *Block by Block* Strategic Plan identifies a "Sustainable Economy" as a cornerstone of the City's long-term development and seeks to create and maintain sustainable employment opportunities in the City and support family-sustaining jobs that allow residents to grow and thrive as a measure to combat poverty.

Research indicates that households facing housing cost burdens often prioritize certain necessities over others with tradeoffs that might include monthly rent or mortgage payments, food, healthcare, and transportation. These trade-offs impact the health, stability, and future of our community members. The City has made an effort to address these tradeoffs through proactive programmatic interventions that were designed to alleviate poverty-driven economic, health, and housing constraints and strengthen wellbeing and socioeconomic viability in the City of Lancaster.

In 2021, the City has continued its work to address pervasive housing and socioeconomic issues perpetuating generational poverty for low- and moderate-income families by designing and implementing HUD-assisted programming to further its strategic goals and decrease the prevalence of inequity and incidences of poverty. The following CDBG and ESG programs represent actions that the City undertook in 2021 to ameliorate intersecting conditions and issues sustaining poverty for the City's most vulnerable households in order to enact the necessary transformational change:

1. *The Critical Repair and Lead Hazard Control Programs*: Specifically directed towards benefitting very low-, low-, and moderate-income households and homeowners, in an effort to preserve assets, increase property values, and maintain quality, safe affordable housing by providing the support necessary to address lead hazards and conduct emergency critical repairs at homes within the City's most poverty-stricken neighborhoods.
2. *The Housing Social Worker Activity*: This activity assists City residents in accessing affordable housing opportunities and provides the necessary support in helping to rectify and resolve corresponding social and health related issues negatively impacting housing stability in such a way that seeks to diminish housing insecurity created by poverty.
3. *The Housing Code Enforcement Activity*: Proactive code enforcement efforts aimed at alleviating unhealthy and unsafe housing and building conditions in socioeconomically challenged areas of the City in an effort to maintain access to high quality, safe, and affordable housing to combat housing inequality and housing cost burden.

4. *The Fair Housing Services Activity:* Furthering the provision and accessibility to quality, safe, and affordable housing through Fair Housing rights outreach, education, and support to reduce and help eliminate housing-based discrimination feeding the cycle of poverty.
5. *CDBG-CV Eviction Prevention Network Activities:* The City provided funding support to two (2) activities to respond to the harmful economic impacts of COVID-19 in an effort to prevent poverty and ensure residents at risk of housing insecurity due to income constraints, especially those at the poverty-level, are able to maintain access to safe, affordable housing through the provision of emergency rental and utility payments.
6. *The Rapid Rehousing Activity:* Permanent supportive housing is a primary strategy to reduce individuals and families from further falling into poverty. Short-and/or medium-term rental assistance as necessary to help individuals or families living in shelters or in places not meant for human habitation move as quickly as possible into permanent housing and achieve stability in that housing. This activity provides permanent housing support as a primary strategy to prevent families and individuals from falling further into poverty.

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

The Department of Community Planning and Economic Development (CPED) assisted with many efforts to overcome gaps in the institutional structure of the service delivery system in the City. Foremost, CPED is the result of a restructuring to increase the availability and accessibility of programs and services targeting low- and moderate-income persons and neighborhoods as well as to advance overall community and economic development goals.

The City recognizes that challenges with 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. For example, in 2021 the City stood up a Department of Neighborhood Engagement to provide an official institutional structure to encourage and strengthen community collaboration and create accessible opportunities for dialogue, learning, partnership, civic leadership building, and action between the City government and neighborhood residents to improve City quality of life.

Furthermore, in 2021 the Mayor implemented a citizen-oriented *Block by Block* Strategic Plan that seeks to further the provision of "Sound Government" as a major pillar. This effort is grounded in the building of structural processes and systems that foster government accessibility, accountability, and transparency to create equitable laws and policies driven by data-informed, citizen-oriented decision making at all levels.

During 2021, CPED representatives belonged to a variety of committees and boards to enhance intra-City collaboration, communication, and relationship-building to continue to develop institutional structures. This involvement helps the City to understand its role and

responsibilities. These collaborative entities include:

- Lancaster City Alliance
- Community Action Partnership of Lancaster County
- Redevelopment Authority of the City of Lancaster
- Lancaster County Coalition to End Homelessness
- Lancaster County HOME Consortium
- Lancaster County Behavioral Health & Development Services Advisory Board
- Emergency Food and Shelter Program (Local Board)
- SACA Development Corporation (a qualified CHDO)
- SoWe: Southwest Neighbors
- Elm Street Revitalization Program for Southeast Lancaster

From 2021 – 2025, the City has sought and will continue to seek to achieve the following goals regarding Lancaster’s institutional structure:

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

**Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)**

In effort to enhance community coordination, City employees sit on various boards and committee whose memberships provide a network that spans private housing and social service agencies – such as Tenfold, Lancaster County Behavioral Health and Development Services, Lancaster County Refugee and Immigrant Coalition, and the Lancaster County Coalition to End Homelessness (Lanc Co MyHome). Further, the Housing Social Worker provides a direct connection to public and private housing opportunities and provides coordination with supportive social services, as needed. The City also facilitates continuous agency-level coordination between the Lancaster City Housing Authority, Lancaster County Redevelopment Authority, and Lanc Co MyHome to streamline provision of affordable housing and supportive services.

The City is involved with the Spanish American Civic Association (SACA), which develops affordable 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.

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

In 2021, the City of Lancaster continued to support the Fair Housing Services Program. This program is carried out by Tenfold's Housing Rights and Resources Center (HRRRC) and receives CDBG administrative funding to address and rectify pervasive impediments identified in the 2021 Analysis of Impediments to Fair Housing Choice. The program also provides services to landlords and tenants in relation to Fair Housing law and landlord/tenant issues. Please see below for more information on how the Fair Housing Program is working to address specific impediments.

Lack of ADA accessibility persists as a barrier impacting fair housing choice in the City. In 2021, the City continued to address this impediment by installing and improving ADA curbs and cuts as a part of the two (2) Place-Based Streetscape Improvements Activity during the 2021 Program Year utilizing CDBG funds (per the City's ADA Improvement Plan). The City's Healthy Homes funding also provided an avenue to make accessibility modifications to homes when appropriate.

The City also continues to ensure meaningful access to programs and activities by Limited English Proficient (LEP) persons to counteract language-based impediments. We have completed our Language Access Plan (included as an attachment to this report) and have a Language Access Coordinator to facilitate language accessibility. Federally funded programs carried out by the City (Critical Repair, Healthy Homes, Lead Hazard Control Programs) have documents and information available in both English and Spanish. Further, the Lead Program Outreach Worker and Housing Social Worker are bilingual and available as a translation resource for Spanish speaking residents.

The City regularly works with the Spanish American Civic Association (SACA) which provides services to the Hispanic community. SACA, as a CHDO, has received HOME funding to create and renovate affordable housing units in the City. Tenfold 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 is a part of the Lancaster County HOME Consortium Please view the County's 2021 CAPER for a comprehensive understanding of how HOME funding is being utilized to address the identified *Impediments to Fair Housing* (2021).

Please see below for details on how, in 2021, The Fair Housing Services Program was tasked with

addressing the following impediments:

**Fair Housing Services Program - Impediment 1:** *With an increasing number of people in the County, there is more demand for an ongoing education program for fair housing requirements.*

This impediment is being addressed with Tenfold's HRRC conducting the following activities:

1. Provision of two (2) Fair Housing trainings in partnership with PHFA and other agencies.
2. Creation and distribution of a digital bi-annual publication that contains Fair Housing information.
3. Provision of technical assistance on Fair Housing issues including facilitating mediations and submission of Fair housing complaint questionnaire to the proper city and/or state enforcement entities.
4. Distribution of the Landlord & Tenant Guide in print and electronically.
5. Provision of consultation and advocacy on issues related to Fair Housing and its close relationship to Landlord/Tenant issues.
6. Consultation and collaboration with City and State Fair Housing enforcement entities.

**Fair Housing Services Program - Impediment 4:** *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 is being addressed with Tenfold's HRRC conducting the following activities:

1. HRRC is working with local disability organizations to explore creation of housing opportunities that will increase housing choice for this community.
2. Provision of informational presentations on Section 811 Project Rental Assistance (a program developed to provide low to moderate income individuals with disabilities access to quality housing) to City housing providers as a viable option of expanding/increasing the availability of 811 units throughout the city.
3. Hosting of one (1) Housing Summit providing fair housing information, in partnership with local agencies – format and date contingent on COVID-19 safety measures.

**Fair Housing Services Program - Impediment 5:** *Home financing data indicates a disparity between denial rates among racial and ethnic groups.*

This impediment is being addressed with Tenfold's HRRC conducting the following activities:

1. Provision of Fair Lending information to consumers through homebuyer classes.
2. Hosting of one (1) Fair Lending network event for City lending institutions – format and date dependent on COVID-19 restrictions and safety measures.



**Fair Housing Services Program - Impediments 2 and 6:** *People with limited English proficiency may have barriers to fair housing (2); and, Lancaster County and the City of Lancaster are racially and ethnically concentrated/segregated (6).*

These impediments are being addressed with Tenfold's HRRC conducting the following activities:

1. Working with local immigrant and resettlement organizations to ensure these populations understand their fair housing rights and that their rights are not being infringed upon.
2. Distribution of the Landlord & Tenant Guide in print and electronically in multiple languages.
3. Utilization of telephonic language lines to serve consumers with varying language needs.
4. Utilization of American Sign Language (ASL) video interpreting service for consumers in need of this service.

## CR-40 – Monitoring 91.220 and 91.230

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

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

Furthermore, the City has also recently updated its Subrecipient Monitoring methodology and procedures within its **CDBG Policy and Procedures Manual** to include the following actions that will strengthen program oversight, provide proactivity opportunities for course correction, as needed, and improve program impact:

In order to adequately track and monitor activity performance, the City will undertake the following specific steps to ensure subrecipients and activities achieve performance objectives on schedule and within budget, comply with all applicable financial, operational, and programmatic regulations, properly expend allocated funding in a timely manner, and to proactively address and resolve emergent issues:

- (1) Implement and Conduct Quarterly Subrecipient and Partner Meetings
  - (a) The primary purpose of these meetings will be to review and discuss:
    - (i) Performance progress and accomplishments achieved
    - (ii) Challenges encountered
    - (iii) Spending and invoicing progress
    - (iv) Collaborate to develop viable solutions to identified issues
- (2) Monitor Activity Performance and Spending at Tangible Expenditure Milestones
  - (a) The City will assess activity performance at the following benchmarks to facilitate course corrections, as needed:
    - (i) Six (6)-Month Target: At least 50% of budget expended and associated activity objectives achieved based on evaluation of the monthly progress reports and invoicing received and processed by the City.
      1. If less, subgrantee and partners will be formally notified that their activity poses a performance risk that may result in funding deallocation and that they will be required to submit a corrective action and spending plan.
    - (ii) Nine (9)-Month Target: At least 75% of budget expended and corresponding activity objectives achieved evaluation of the monthly progress reports and invoicing received and processed by the City.

1. If less, subrecipient or partner will be required to submit a formal corrective action and spending plan detailing actions that be will be undertaken to mitigate the risk of risk and project realistic anticipated spending for the remaining performance period.
  2. For any funding that the subrecipient or partner identifies as unable to be spent, the City will take formal steps to complete a budget amendment in accordance with City policy and procedures to reallocate funding to another activity to ensure timely expenditure of the entitlement grant in such a way that also furthers the goals of the CDBG program and aligns with City priorities.
- (3) Technical Assistance Provision
- (a) The City will provide the necessary technical assistance and support to subrecipients and partners who are conducting activities facing performance and spending challenges based on the results of the preceding monitoring

Finally, the City will employ the monitoring methodology and approaches detailed in HUD's Managing CDBG A Guidebook for Grantees on Subrecipient Oversight (March 2005) as best practices to facilitate the proper, effective, and efficient management of its CDBG program.

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

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

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

A legal advertisement was placed in the local newspaper on Friday, March 11th, 2022, announcing a 16-day public comment period. This information was also posted in the Lancaster's most prominent local paper and on the City's website, along with a copy of the draft report.

In order to promote a more active and informed citizen participation process, the City is planning on hosting a public educational workshop event in April of 2022 to review the City's HUD-assisted Community Development programming, such as ESG, CDBG, and HOME, review and explain its 2021 Consolidated Annual Performance Evaluation Report and typical reporting process, present its planned activities for 2022 based on the priorities established in the 2021 – 2025 Consolidated Action Plan, and facilitate public discourse and identification of community needs as part of its 2022 Annual Action Plan planning processes. Specific details about this workshop will be provided in the near future.

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

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

For more information, please see the attached Citizen Participation Plan.

#### **CR-45 – CDBG 91.520(c)**

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

During 2021, the jurisdiction did not make any changes to its program objectives or goals nor is it seeking to change its priorities for programmatic or resource allocation.

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

No.

DRAFT

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

### ESG Supplement to the CAPER in *e-snaps* For Paperwork Reduction Act

#### 1. Recipient Information—All Recipients Complete

##### Basic Grant Information

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

##### ESG Contact Name

Prefix	Ms.
First Name	Simone
Middle Name	0
Last Name	Dia
Suffix	0
Title	Community Development Administrator, Lead Safety and Community Development

##### ESG Contact Address

Street Address 1	120 North Duke Street
Street Address 2	PO Box 1599
City	Lancaster
State	PA
ZIP Code	-
Phone Number	7172914743
Extension	0
Fax Number	0
Email Address	SDia@cityoflancasterpa.com

##### ESG Secondary Contact

Prefix	Mr
First Name	Craig
Last Name	Walt
Suffix	0
Title	Bureau Chief, Lead Safety and Community Development
Phone Number	7177192193
Extension	0

**Email Address**

CWalt@cityoflanasterpa.com

**2. Reporting Period—All Recipients Complete**

**Program Year Start Date** 01/01/2021

**Program Year End Date** 12/31/2021

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

**Subrecipient or Contractor Name:** LANCASTER

**City:** Lancaster

**State:** PA

**Zip Code:** 17602, 2825

**DUNS Number:** 010569457

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Unit of Government

**ESG Subgrant or Contract Award Amount:** 10925

**Subrecipient or Contractor Name:** Tabor Community Services

**City:** Lancaster

**State:** PA

**Zip Code:** 17602, 5013

**DUNS Number:** 144089000

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 90754

**Subrecipient or Contractor Name:** YWCA Lancaster

**City:** Lancaster

**State:** PA

**Zip Code:** 17602, 2923

**DUNS Number:** 075318626

**Is subrecipient a victim services provider:** Y

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 44000

## CR-65 – Persons Assisted

### 4. Persons Served

#### 4a. Complete for Homelessness Prevention Activities

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

Table 9 – Household Information for Homeless Prevention Activities

#### 4b. Complete for Rapid Re-Housing Activities

Number of Persons in Households	Total
Adults	89
Children	68
Don't Know/Refused/Other	0
Missing Information	0
<b>Total</b>	<b>157</b>

Table 10 – Household Information for Rapid Re-Housing Activities

#### 4c. Complete for Shelter

Number of Persons in Households	Total
Adults	16
Children	28
Don't Know/Refused/Other	0
Missing Information	0
<b>Total</b>	<b>44</b>

Table 11 – Shelter Information

#### 4d. Street Outreach

Number of Persons in Households	Total
Adults	182
Children	0
Don't Know/Refused/Other	0
Missing Information	0
<b>Total</b>	<b>182</b>

Table 12 – Household Information for Street Outreach



#### 4e. Totals for all Persons Served with ESG

Number of Persons in Households	Total
Adults	287
Children	96
Don't Know/Refused/Other	0
Missing Information	0
<b>Total</b>	<b>383</b>

Table 13 – Household Information for Persons Served with ESG

#### 5. Gender—Complete for All Activities

	Total
Male	206
Female	175
Transgender	1
Don't Know/Refused/Other	1
Missing Information	0
<b>Total</b>	<b>383</b>

Table 14 – Gender Information

## 6. Age—Complete for All Activities

	Total
Under 18	96
18-24	16
25 and over	271
Don't Know/Refused/Other	0
Missing Information	0
<b>Total</b>	<b>383</b>

Table 15 – Age Information

## 7. Special Populations Served—Complete for All Activities

### Number of Persons in Households

Subpopulation	Total	Total Persons Served – Prevention	Total Persons Served – RRH	Total Persons Served in Emergency Shelters
Veterans	11	0	1	10
Victims of Domestic Violence	47	0	23	24
Elderly	0	0	0	0
HIV/AIDS	3	0	1	2
Chronically Homeless	85	0	41	44
<b>Persons with Disabilities:</b>				
Severely Mentally Ill	0	0	0	
Chronic Substance Abuse	10	0	4	6
Other Disability	84	0	45	39
Total (Unduplicated if possible)	94	0	49	45

Table 15 – Special Population Served

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

### 10. Shelter Utilization

Number of New Units - Rehabbed	0
Number of New Units - Conversion	0
Total Number of bed-nights available	0
Total Number of bed-nights provided	0
Capacity Utilization	0.00%

**Table 16 – Shelter Capacity**

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

ESG funds were subcontracted to sub-recipients for the period of July 1, 2021 – June 30, 2022. The above ESG expenditures were delayed due to both the incredible capacity strain on our service providers to meet the new emergency shelter demands brought on by COVID-19 and the lack of available rental housing available for Rapid Rehousing due to the Eviction Moratorium. As a result, there were no expenditures of 2021 during the program year. The remaining funds will be spent over the course of 2022.

Project outcomes data was measured under the performance standards developed in consultation with the CoC. An outline of these measures are included in the contracts with our subrecipients and can be found as an attachment to this document. As described, there were no 2021 ESG expenditures during the 2021 program year and therefore no associated project outcomes data provided.

## CR-75 – Expenditures

### 111. Expenditures

#### 11a. ESG Expenditures for Homelessness Prevention

	Dollar Amount of Expenditures in Program Year		
	2019	2020	2021
Expenditures for Rental Assistance	0	0	0
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	0	0	0
Expenditures for Housing Relocation & Stabilization Services - Services	0	0	0
Expenditures for Homeless Prevention under Emergency Shelter Grants Program	0	0	0
<b>Subtotal Homelessness Prevention</b>	<b>0</b>	<b>0</b>	<b>0</b>

Table 17 – ESG Expenditures for Homelessness Prevention

#### 11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year		
	2019	2020	2021
Expenditures for Rental Assistance	0	0	0
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	0	0	0
Expenditures for Housing Relocation & Stabilization Services - Services	\$81,232.22	\$134,985.00	0
Expenditures for Homeless Assistance under Emergency Shelter Grants Program	0	0	0
<b>Subtotal Rapid Re-Housing</b>	<b>\$81,232.22</b>	<b>\$134,985.00</b>	<b>0</b>

Table 18 – ESG Expenditures for Rapid Re-Housing

#### 11c. ESG Expenditures for Emergency Shelter

	Dollar Amount of Expenditures in Program Year		
	2019	2020	2021
Essential Services	0	0	0
Operations	0	0	0
Renovation	0	0	0
Major Rehab	0	0	0
Conversion	0	0	0
<b>Subtotal</b>	<b>0</b>	<b>0</b>	<b>0</b>

Table 19 – ESG Expenditures for Emergency Shelter

**11d. Other Grant Expenditures**

	Dollar Amount of Expenditures in Program Year		
	2019	2020	2021
Street Outreach	0	0	0
HMIS	0	0	0
Administration	0	\$4,285.33	0

**Table 20 - Other Grant Expenditures****11e. Total ESG Grant Funds**

Total ESG Funds Expended	2019	2020	2021
	\$81,232.22	\$139,270.33	\$0

**Table 21 - Total ESG Funds Expended****11f. Match Source**

	2019	2020	2021
Other Non-ESG HUD Funds	0	0	0
Other Federal Funds	0	0	0
State Government	0	0	0
Local Government	0	0	0
Private Funds	0	0	0
Other	0	0	0
Fees	0	0	0
Program Income	0	0	0
<b>Total Match Amount</b>	<b>0</b>	<b>0</b>	<b>0</b>

**Table 22 - Other Funds Expended on Eligible ESG Activities****11g. Total**

Total Amount of Funds Expended on ESG Activities	2019	2020	2021
	\$81,232.22	\$139,270.33	0

**Table 23 - Total Amount of Funds Expended on ESG Activities**

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## Appendix 1

### PART I: SUMMARY OF CDBG RESOURCES

01 UNEXPENDED CDBG FUNDS AT END OF PREVIOUS PROGRAM YEAR	0.00
02 ENTITLEMENT GRANT	1,694,127.00
03 SURPLUS URBAN RENEWAL	0.00
04 SECTION 108 GUARANTEED LOAN FUNDS	0.00
05 CURRENT YEAR PROGRAM INCOME	73,622.29
05a CURRENT YEAR SECTION 108 PROGRAM INCOME (FOR SI TYPE)	0.00
06 FUNDS RETURNED TO THE LINE-OF-CREDIT	0.00
06a FUNDS RETURNED TO THE LOCAL CDBG ACCOUNT	0.00
07 ADJUSTMENT TO COMPUTE TOTAL AVAILABLE	0.00
08 TOTAL AVAILABLE (SUM, LINES 01-07)	1,767,749.29

### PART II: SUMMARY OF CDBG EXPENDITURES

09 DISBURSEMENTS OTHER THAN SECTION 108 REPAYMENTS AND PLANNING/ADMINISTRATION	1,882,993.68
10 ADJUSTMENT TO COMPUTE TOTAL AMOUNT SUBJECT TO LOW/MOD BENEFIT	0.00
11 AMOUNT SUBJECT TO LOW/MOD BENEFIT (LINE 09 + LINE 10)	1,882,993.68
12 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	289,906.09
13 DISBURSED IN IDIS FOR SECTION 108 REPAYMENTS	0.00
14 ADJUSTMENT TO COMPUTE TOTAL EXPENDITURES	0.00
15 TOTAL EXPENDITURES (SUM, LINES 11-14)	2,172,899.77
16 UNEXPENDED BALANCE (LINE 08 - LINE 15)	(405,150.48)

### PART III: LOW/MOD BENEFIT THIS REPORTING PERIOD

17 EXPENDED FOR LOW/MOD HOUSING IN SPECIAL AREAS	0.00
18 EXPENDED FOR LOW/MOD MULTI-UNIT HOUSING	0.00
19 DISBURSED FOR OTHER LOW/MOD ACTIVITIES	1,882,993.68
20 ADJUSTMENT TO COMPUTE TOTAL LOW/MOD CREDIT	0.00
21 TOTAL LOW/MOD CREDIT (SUM, LINES 17-20)	1,882,993.68
22 PERCENT LOW/MOD CREDIT (LINE 21/LINE 11)	100.00%

### LOW/MOD BENEFIT FOR MULTI-YEAR CERTIFICATIONS

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

### PART IV: PUBLIC SERVICE (PS) CAP CALCULATIONS

27 DISBURSED IN IDIS FOR PUBLIC SERVICES	53,340.98
28 PS UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	0.00
29 PS UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	0.00
30 ADJUSTMENT TO COMPUTE TOTAL PS OBLIGATIONS	0.00
31 TOTAL PS OBLIGATIONS (LINE 27 + LINE 28 - LINE 29 + LINE 30)	53,340.98
32 ENTITLEMENT GRANT	1,694,127.00
33 PRIOR YEAR PROGRAM INCOME	71,579.52
34 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PS CAP	0.00
35 TOTAL SUBJECT TO PS CAP (SUM, LINES 32-34)	1,765,706.52
36 PERCENT FUNDS OBLIGATED FOR PS ACTIVITIES (LINE 31/LINE 35)	3.02%

### PART V: PLANNING AND ADMINISTRATION (PA) CAP

37 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	289,906.09
38 PA UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	0.00
39 PA UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	0.00
40 ADJUSTMENT TO COMPUTE TOTAL PA OBLIGATIONS	0.00
41 TOTAL PA OBLIGATIONS (LINE 37 + LINE 38 - LINE 39 +LINE 40)	289,906.09
42 ENTITLEMENT GRANT	1,694,127.00
43 CURRENT YEAR PROGRAM INCOME	73,622.29
44 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PA CAP	0.00
45 TOTAL SUBJECT TO PA CAP (SUM, LINES 42-44)	1,767,749.29
46 PERCENT FUNDS OBLIGATED FOR PA ACTIVITIES (LINE 41/LINE 45)	16.40%



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

Report returned no data.

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

Report returned no data.

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

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2020	17	1868	6545295	Streets Improvements	03K	LMA	\$43,860.49
2020	17	1868	6547924	Streets Improvements	03K	LMA	\$57,701.19
2020	17	1868	6555691	Streets Improvements	03K	LMA	\$306,323.11
2020	17	1868	6578570	Streets Improvements	03K	LMA	\$42,115.21
2021	7	1929	6578570	Place-based Streetscape Improvement	03K	LMA	\$185,707.22
					03K	Matrix Code	\$635,707.22
2020	10	1864	6455323	Neighborhood Crime Reduction	05I	LMA	\$4,039.44
2020	10	1864	6462107	Neighborhood Crime Reduction	05I	LMA	\$6,906.14
2021	10	1931	6558921	Neighborhood Crime Reduction through Police Social Worker Program	05I	LMA	\$16,071.18
2021	10	1931	6578570	Neighborhood Crime Reduction through Police Social Worker Program	05I	LMA	\$4,721.18
					05I	Matrix Code	\$31,737.94
2020	13	1867	6551933	Housing Social Worker	05X	LMC	\$8,308.86
2020	13	1867	6578570	Housing Social Worker	05X	LMC	\$13,294.18
					05X	Matrix Code	\$21,603.04
2019	7	1886	6495243	317 Laurel Street	14A	LMH	\$5,480.00
2019	7	1888	6462107	430 Green Street	14A	LMH	\$2,400.00
2019	7	1888	6545295	430 Green Street	14A	LMH	\$1,954.00
2019	7	1891	6495243	707 S Queen Street	14A	LMH	\$5,770.00
2019	7	1891	6529488	707 S Queen Street	14A	LMH	\$8,000.00
2019	7	1895	6495243	543 Green Street	14A	LMH	\$1,110.00
2019	7	1902	6495243	512 S Duke Street	14A	LMH	\$8,000.00
2019	7	1902	6555691	512 S Duke Street	14A	LMH	\$4,475.00
2019	7	1904	6495243	405 Pearl Street	14A	LMH	\$4,321.50
2019	7	1904	6512551	405 Pearl Street	14A	LMH	\$677.50
2019	7	1905	6495243	764 Poplar Street	14A	LMH	\$6,415.83
2019	7	1905	6512551	764 Poplar Street	14A	LMH	\$3,204.17
2019	7	1907	6495243	613 N Queen Street	14A	LMH	\$4,999.00
2019	7	1910	6512551	621 N Pine Street	14A	LMH	\$4,404.00
2019	7	1910	6529488	621 N Pine Street	14A	LMH	\$595.00
2019	7	1911	6529488	307 New Dorwart Street	14A	LMH	\$2,400.00
2019	7	1919	6578570	440 S Plum Street	14A	LMH	\$8,000.00
2019	7	1920	6545295	1303 Fremont Street	14A	LMH	\$4,995.00
2019	7	1941	6555691	538 S Duke Street	14A	LMH	\$12,285.00
2019	7	1949	6578570	305 N Broad Street	14A	LMH	\$12,850.00
2019	7	1955	6578570	804 Highland Avenue	14A	LMH	\$8,500.00
2019	7	1963	6578570	754 St Joseph Street	14A	LMH	\$6,900.00
					14A	Matrix Code	\$117,736.00
2018	1	1786	6455323	Homeowner Rehab Admin	14H	LMC	\$9,510.58
2018	1	1786	6462107	Homeowner Rehab Admin	14H	LMC	\$8,487.01
2018	1	1786	6471931	Homeowner Rehab Admin	14H	LMC	\$10,086.33
2018	1	1786	6495243	Homeowner Rehab Admin	14H	LMC	\$14,538.60
2019	1	1820	6512551	Critical Repair and Lead Hazard Reduction Admin	14H	LMC	\$9,203.41
2019	1	1820	6529488	Critical Repair and Lead Hazard Reduction Admin	14H	LMC	\$11,496.73
2019	1	1820	6545295	Critical Repair and Lead Hazard Reduction Admin	14H	LMC	\$8,975.36
2019	7	1914	6529488	912 High Street	14H	LMH	\$6,100.00
2019	7	1914	6545295	912 High Street	14H	LMH	\$4,210.00
2019	7	1956	6578570	413 St Joseph Street	14H	LMH	\$5,850.00
2019	7	1959	6578570	535 Woodward Street	14H	LMH	\$3,200.00
2019	7	1961	6578570	665 Hebrank Street	14H	LMH	\$1,727.79
2020	9	1849	6455323	Critical Repair and Lead Hazard Reduction Program Admin	14H	LMC	\$2,168.50
2020	9	1849	6462107	Critical Repair and Lead Hazard Reduction Program Admin	14H	LMC	\$1,219.58
2020	9	1849	6471931	Critical Repair and Lead Hazard Reduction Program Admin	14H	LMC	\$1,521.70
2020	9	1849	6495243	Critical Repair and Lead Hazard Reduction Program Admin	14H	LMC	\$15,820.19
2020	9	1849	6512551	Critical Repair and Lead Hazard Reduction Program Admin	14H	LMC	\$2,713.10
2020	9	1849	6529488	Critical Repair and Lead Hazard Reduction Program Admin	14H	LMC	\$4,406.12
2020	9	1849	6545295	Critical Repair and Lead Hazard Reduction Program Admin	14H	LMC	\$21,229.74
2020	9	1849	6547924	Critical Repair and Lead Hazard Reduction Program Admin	14H	LMC	\$276.31
2020	9	1849	6551933	Critical Repair and Lead Hazard Reduction Program Admin	14H	LMC	\$55,452.14
2020	9	1849	6555691	Critical Repair and Lead Hazard Reduction Program Admin	14H	LMC	\$620.93
2020	9	1849	6578570	Critical Repair and Lead Hazard Reduction Program Admin	14H	LMC	\$35,622.93
					14H	Matrix Code	\$234,437.05





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Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2017	8	1881	6462107	746 S Lime Street	14I	LMH	\$563.00
2017	8	1960	6578570	535 Woodward Street	14I	LMH	\$287.00
2017	8	1962	6578570	665 Hebrank Street	14I	LMH	\$378.00
2019	6	1887	6495243	450 W Vine Street	14I	LMH	\$1,312.00
2019	6	1889	6462107	430 Green Street	14I	LMH	\$720.00
2019	6	1890	6495243	620 S Ann Street	14I	LMH	\$255.00
2019	6	1892	6529488	707 S Queen Street	14I	LMH	\$663.00
2019	6	1893	6495243	132 S Ann Street	14I	LMH	\$2,622.00
2019	6	1894	6471931	576 Pershing Avenue	14I	LMH	\$462.00
2019	6	1896	6495243	543 Green Street	14I	LMH	\$1,522.00
2019	6	1897	6512551	14 Caroline Street	14I	LMH	\$1,661.00
2019	6	1898	6512551	629 St Joseph Street	14I	LMH	\$2,000.00
2019	6	1899	6495243	317 Laurel Street	14I	LMH	\$637.00
2019	6	1900	6495243	725 Fremont Street	14I	LMH	\$948.00
2019	6	1901	6545295	512 S Duke Street	14I	LMH	\$1,908.00
2019	6	1901	6555691	512 S Duke Street	14I	LMH	\$118.00
2019	6	1903	6495243	307 New Dorwart Street	14I	LMH	\$838.00
2019	6	1906	6495243	764 Poplar Street	14I	LMH	\$1,342.00
2019	6	1908	6512551	336 Beaver Street	14I	LMH	\$838.00
2019	6	1909	6545295	306 Laurel Street	14I	LMH	\$770.00
2019	6	1913	6578570	627 St Joseph Street	14I	LMH	\$10,794.60
2019	6	1915	6578570	912 High Street	14I	LMH	\$470.00
2019	6	1916	6545295	304 Laurel Street	14I	LMH	\$1,020.00
2019	6	1917	6551933	440 S Plum Street	14I	LMH	\$2,457.00
2019	6	1918	6545295	455 W Vine Street	14I	LMH	\$689.00
2019	6	1921	6551933	538 S Duke Street	14I	LMH	\$5,250.00
2019	6	1921	6555691	538 S Duke Street	14I	LMH	\$3,530.00
2019	6	1923	6578570	340 E Ross Street	14I	LMH	\$8,800.00
2019	6	1924	6578570	329 Mill Street	14I	LMH	\$7,276.00
2019	6	1940	6578570	472 Manor Street	14I	LMH	\$675.00
2019	6	1942	6578570	465 Atlantic Avenue	14I	LMH	\$1,660.00
2019	6	1943	6578570	804 Highland Avenue	14I	LMH	\$11,964.00
2019	6	1944	6578570	415 Chester Street	14I	LMH	\$345.00
2019	6	1946	6578570	441 Pershing Avenue	14I	LMH	\$6,325.00
2019	7	1945	6578570	804 Highland Avenue	14I	LMH	\$10,000.00
2019	7	1958	6578570	636.5 E Walnut Street	14I	LMH	\$5,200.00
					14I	Matrix Code	\$96,299.60
2019	1	1833	6455323	Housing Code Enforcement	15	LMA	\$54,505.02
2019	1	1833	6462107	Housing Code Enforcement	15	LMA	\$45,728.33
2019	1	1833	6471931	Housing Code Enforcement	15	LMA	\$48,314.92
2019	1	1833	6495243	Housing Code Enforcement	15	LMA	\$51,341.12
2020	12	1866	6455323	Housing Code Enforcement	15	LMA	\$2,891.64
2020	12	1866	6462107	Housing Code Enforcement	15	LMA	\$986.26
2020	12	1866	6471931	Housing Code Enforcement	15	LMA	\$1,147.05
2020	12	1866	6495243	Housing Code Enforcement	15	LMA	\$73,770.65
2020	12	1866	6512551	Housing Code Enforcement	15	LMA	\$51,457.20
2020	12	1866	6529488	Housing Code Enforcement	15	LMA	\$72,220.74
2020	12	1866	6545295	Housing Code Enforcement	15	LMA	\$18,535.38
2020	12	1866	6551933	Housing Code Enforcement	15	LMA	\$2,150.73
2020	12	1866	6555691	Housing Code Enforcement	15	LMA	\$17.64
2020	12	1866	6578570	Housing Code Enforcement	15	LMA	\$6,044.96
2021	5	1926	6545295	Housing Code Enforcement	15	LMA	\$87,995.55
2021	5	1926	6547924	Housing Code Enforcement	15	LMA	\$139.46
2021	5	1926	6551933	Housing Code Enforcement	15	LMA	\$69,705.13
2021	5	1926	6578570	Housing Code Enforcement	15	LMA	\$121,573.05
					15	Matrix Code	\$708,524.83
2020	11	1865	6471931	ASSETS Micro-enterprise Development	18C	LMC	\$36,948.00
					18C	Matrix Code	\$36,948.00
Total							\$1,882,993.68

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

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity to prevent, prepare for, and respond to Coronavirus	Activity Name	Grant Number	Fund Type	Matrix Code	National Objective	Drawn Amount
2020	10	1864	6455323	No	Neighborhood Crime Reduction	B20MC420010	EN	05I	LMA	\$4,039.44
2020	10	1864	6462107	No	Neighborhood Crime Reduction	B20MC420010	EN	05I	LMA	\$1,394.38
2020	10	1864	6462107	No	Neighborhood Crime Reduction	B21MC420010	PI	05I	LMA	\$5,511.76



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Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity to prevent, prepare for, and respond to Coronavirus	Activity Name	Grant Number	Fund Type	Matrix Code	National Objective	Drawn Amount
2021	10	1931	6558921	No	Neighborhood Crime Reduction through Police Social Worker Program	B21MC420010	EN	05I	LMA	\$16,071.18
2021	10	1931	6578570	No	Neighborhood Crime Reduction through Police Social Worker Program	B21MC420010	EN	05I	LMA	\$4,721.18
								05I	Matrix Code	\$31,737.94
2020	13	1867	6551933	No	Housing Social Worker	B20MC420010	EN	05X	LMC	\$8,308.86
2020	13	1867	6578570	No	Housing Social Worker	B20MC420010	EN	05X	LMC	\$13,294.18
								05X	Matrix Code	\$21,603.04
				No	Activity to prevent, prepare for, and respond to Coronavirus					\$53,340.98
Total										\$53,340.98

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

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2020	14	1885	6555691	Comprehensive Plan Development	20		\$53,253.45
2020	14	1885	6578570	Comprehensive Plan Development	20		\$25,235.07
					20	Matrix Code	\$78,488.52
2019	2	1821	6455323	CDBG Planning & Admin	21A		\$9,155.49
2019	2	1821	6462107	CDBG Planning & Admin	21A		\$8,826.31
2019	2	1821	6471931	CDBG Planning & Admin	21A		\$9,628.15
2019	2	1821	6495243	CDBG Planning & Admin	21A		\$13,030.00
2019	2	1821	6512551	CDBG Planning & Admin	21A		\$4,432.53
2019	2	1821	6529488	CDBG Planning & Admin	21A		\$9,032.08
2019	2	1821	6545295	CDBG Planning & Admin	21A		\$8,425.32
2019	2	1821	6578570	CDBG Planning & Admin	21A		\$23,137.99
2020	14	1850	6462107	CDBG Administration	21A		\$1,585.30
2020	14	1850	6471931	CDBG Administration	21A		\$1,024.78
2020	14	1850	6495243	CDBG Administration	21A		\$602.25
2020	14	1850	6512551	CDBG Administration	21A		\$32.97
2020	14	1850	6529488	CDBG Administration	21A		\$294.68
2020	14	1850	6545295	CDBG Administration	21A		\$6,546.80
2020	14	1850	6551933	CDBG Administration	21A		\$15,758.18
2020	14	1850	6555691	CDBG Administration	21A		\$24,375.00
					21A	Matrix Code	\$135,887.83
2020	14	1851	6512551	Indirect Admin	21B		\$5,716.53
2020	14	1851	6551933	Indirect Admin	21B		\$1,475.07
2021	2	1928	6551933	Indirect Admin	21B		\$48,338.14
					21B	Matrix Code	\$55,529.74
2020	16	1870	6471931	Fair Housing Services	21D		\$833.25
2020	16	1870	6495243	Fair Housing Services	21D		\$833.25
2020	16	1870	6512551	Fair Housing Services	21D		\$4,249.50
2020	16	1870	6529488	Fair Housing Services	21D		\$7,834.00
2021	3	1930	6578570	Fair Housing Services	21D		\$6,250.00
					21D	Matrix Code	\$20,000.00
Total							\$289,906.09



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**PART I: SUMMARY OF CDBG-CV RESOURCES**

01 CDBG-CV GRANT	1,552,939.00
02 FUNDS RETURNED TO THE LINE-OF-CREDIT	0.00
03 FUNDS RETURNED TO THE LOCAL CDBG ACCOUNT	0.00
04 TOTAL AVAILABLE (SUM, LINES 01-03)	1,552,939.00

**PART II: SUMMARY OF CDBG-CV EXPENDITURES**

05 DISBURSEMENTS OTHER THAN SECTION 108 REPAYMENTS AND PLANNING/ADMINISTRATION	681,261.90
06 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	0.00
07 DISBURSED IN IDIS FOR SECTION 108 REPAYMENTS	0.00
08 TOTAL EXPENDITURES (SUM, LINES 05 - 07)	681,261.90
09 UNEXPENDED BALANCE (LINE 04 - LINE8 )	871,677.10

**PART III: LOWMOD BENEFIT FOR THE CDBG-CV GRANT**

10 EXPENDED FOR LOW/MOD HOUSING IN SPECIAL AREAS	0.00
11 EXPENDED FOR LOW/MOD MULTI-UNIT HOUSING	0.00
12 DISBURSED FOR OTHER LOW/MOD ACTIVITIES	681,261.90
13 TOTAL LOW/MOD CREDIT (SUM, LINES 10 - 12)	681,261.90
14 AMOUNT SUBJECT TO LOW/MOD BENEFIT (LINE 05)	681,261.90
15 PERCENT LOW/MOD CREDIT (LINE 13/LINE 14)	100.00%

**PART IV: PUBLIC SERVICE (PS) CALCULATIONS**

16 DISBURSED IN IDIS FOR PUBLIC SERVICES	376,953.47
17 CDBG-CV GRANT	1,552,939.00
18 PERCENT OF FUNDS DISBURSED FOR PS ACTIVITIES (LINE 16/LINE 17)	24.27%

**PART V: PLANNING AND ADMINISTRATION (PA) CAP**

19 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	0.00
20 CDBG-CV GRANT	1,552,939.00
21 PERCENT OF FUNDS DISBURSED FOR PA ACTIVITIES (LINE 19/LINE 20)	0.00%



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LINE 10 DETAIL: ACTIVITIES TO CONSIDER IN DETERMINING THE AMOUNT TO ENTER ON LINE 10

Report returned no data.

LINE 11 DETAIL: ACTIVITIES TO CONSIDER IN DETERMINING THE AMOUNT TO ENTER ON LINE 11

Report returned no data.

LINE 12 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 12

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount	
2020	5	1873	6529488	City Health Worker for COVID-19 Support	05M	LMA	\$15,854.72	
			6578570	City Health Worker for COVID-19 Support	05M	LMA	\$15,315.97	
			6601348	City Health Worker for COVID-19 Support	05M	LMA	\$20,766.28	
	6	1948	6578570	Public Service Outreach Specialist (CV - Public Health Services)	05Z	LMA	\$16,737.75	
			1874	6471931	Eviction Prevention Network	05Q	LMC	\$64,919.95
				6495243	Eviction Prevention Network	05Q	LMC	\$179,390.06
		6512551		Eviction Prevention Network	05Q	LMC	\$1,413.62	
		6529488		Eviction Prevention Network	05Q	LMC	\$44,828.55	
		1875	6471931	Utility Assistance Program	05Q	LMC	\$7,490.06	
			6495243	Utility Assistance Program	05Q	LMC	\$768.75	
			6529488	Utility Assistance Program	05Q	LMC	\$9,467.76	
		7	1969	6601348	928 N Plum Street	14A	LMH	\$8,807.45
			1972	6601348	740 S Lime Street	14A	LMH	\$6,800.00
			1974	6601348	608 S Ann Street	14H	LMH	\$7,600.00
			1976	6601348	644 East End Avenue	14A	LMH	\$4,300.00
			1977	6601348	45 W Farnum Street	14A	LMH	\$8,500.00
			1982	6601348	736 St Joseph Street	14A	LMH	\$7,199.70
			1983	6601348	144 N Broad Street	14A	LMH	\$6,000.00
	1984		6601348	643 E Chestnut Street	14A	LMH	\$24,290.00	
	8	1877	6471931	ASSETS Technical Assistance for COVID-19 Relief	18B	LMA	\$103,000.00	
		1878	6432521	Building Codes Support for COVID-19 Response	15	LMA	\$10,572.37	
			6444101	Building Codes Support for COVID-19 Response	15	LMA	\$8,704.63	
			6455323	Building Codes Support for COVID-19 Response	15	LMA	\$11,181.64	
			6462107	Building Codes Support for COVID-19 Response	15	LMA	\$7,626.45	
			6471931	Building Codes Support for COVID-19 Response	15	LMA	\$11,484.02	
			6495243	Building Codes Support for COVID-19 Response	15	LMA	\$28,911.79	
			6512551	Building Codes Support for COVID-19 Response	15	LMA	\$11,530.88	
			6529488	Building Codes Support for COVID-19 Response	15	LMA	\$14,585.27	
			6545295	Building Codes Support for COVID-19 Response	15	LMA	\$10,116.26	
			6551933	Building Codes Support for COVID-19 Response	15	LMA	\$3,599.98	
			6578570	Building Codes Support for COVID-19 Response	15	LMA	\$4,548.01	
			6594602	Building Codes Support for COVID-19 Response	15	LMA	\$2,534.57	
			6601348	Building Codes Support for COVID-19 Response	15	LMA	\$2,415.41	
Total							\$681,261.90	

LINE 16 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 16

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2020	5	1873	6529488	City Health Worker for COVID-19 Support	05M	LMA	\$15,854.72
			6578570	City Health Worker for COVID-19 Support	05M	LMA	\$15,315.97
			6601348	City Health Worker for COVID-19 Support	05M	LMA	\$20,766.28
	6	1948	6578570	Public Service Outreach Specialist (CV - Public Health Services)	05Z	LMA	\$16,737.75
		1874	6471931	Eviction Prevention Network	05Q	LMC	\$64,919.95
			6495243	Eviction Prevention Network	05Q	LMC	\$179,390.06
			6512551	Eviction Prevention Network	05Q	LMC	\$1,413.62
			6529488	Eviction Prevention Network	05Q	LMC	\$44,828.55
		1875	6471931	Utility Assistance Program	05Q	LMC	\$7,490.06
			6495243	Utility Assistance Program	05Q	LMC	\$768.75
			6529488	Utility Assistance Program	05Q	LMC	\$9,467.76



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Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
Total							\$376,953.47

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

Report returned no data.

PR26 - Activity Summary by Selected Grant

Date Generated: 03/09/2022

Grantee: LANCASTER

Grant Year: 2021

Formula and Competitive Grants only

Total Grant Amount for 2021 Grant year = \$1,694,127.00														
State	Grantee Name	Grant Year	Grant Number	Activity Group	Matrix Code	National Objective	IDIS Activity	Activity to prevent, prepare for, and respond to Coronavirus	Activity Status	Amount Funded From Selected Grant	Amount Drawn From Selected Grant	% of CDBG Drawn From Selected Grant/Grant	Total CDBG Funded Amount (All Years All Sources)	Total CDBG Drawn Amount (All Years All Sources)
PA	LANCASTER	2021	B21MC420010	Administrative And Planning	21A		1927	No	Open	\$180,000.00	\$0.00		\$180,000.00	
PA	LANCASTER	2021	B21MC420010	Administrative And Planning	21B		1928	No	Open	\$54,235.00	\$48,338.14		\$54,235.00	\$48,338.14
PA	LANCASTER	2021	B21MC420010	Administrative And Planning	21D		1930	No	Open	\$20,000.00	\$7,500.00		\$20,000.00	\$7,500.00
				Total Administrative And Planning						\$254,235.00	\$55,838.14	3.30%	\$254,235.00	\$55,838.14
PA	LANCASTER	2021	B21MC420010	Economic Development	18C	LMC	1932	No	Open	\$20,000.00	\$0.00		\$20,000.00	
				Total Economic Development						\$20,000.00	\$0.00	0.00%	\$20,000.00	\$0.00
PA	LANCASTER	2021	B21MC420010	Housing	14H	LMH	1934	No	Open	\$40,000.00	\$403.41		\$40,000.00	\$403.41
PA	LANCASTER	2021	B21MC420010	Housing	15	LMA	1926	No	Open	\$303,122.29	\$243,144.85		\$358,000.00	\$298,022.56
PA	LANCASTER	2021	B21MC420010	Housing	15	LMA	1933	No	Open	\$150,000.00	\$0.00		\$150,000.00	
				Total Housing						\$493,122.29	\$243,548.26	14.38%	\$548,000.00	\$298,425.97
PA	LANCASTER	2021	B21MC420010	Public Improvements	03E	LMA	2003	No	Open	\$75,000.00	\$0.00		\$75,000.00	
PA	LANCASTER	2021	B21MC420010	Public Improvements	03K	LMA	1929	No	Open	\$225,000.00	\$185,707.22		\$225,000.00	\$185,707.22
				Total Public Improvements						\$300,000.00	\$185,707.22	10.96%	\$300,000.00	\$185,707.22
PA	LANCASTER	2021	B21MC420010	Public Services	05I	LMA	1931	No	Open	\$87,928.00	\$25,016.50		\$87,928.00	\$25,016.50
PA	LANCASTER	2021	B21MC420010	Public Services	05M	LMA	1939	No	Open	\$80,000.00	\$0.00		\$80,000.00	
				Non CARES Related Public Services						\$167,928.00	\$25,016.50	1.48%	\$167,928.00	\$25,016.50
				Total 2021						\$1,235,285.29	\$510,110.12	30.11%	\$1,290,163.00	\$564,987.83
				Grand Total						\$1,235,285.29	\$510,110.12	30.11%	\$1,290,163.00	\$564,987.83

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IDIS

Plan IDIS Year Project	Project Title and Description		Program	Project Estimate	Committed Amount	Amount Drawn Thru Report Year
2021 1	ESG21 City of Lancaster (21-22)	Through the joint funding application process, the City will seek homeless service providers who will meet the growing need for emergency shelter, outreach, and rapid rehousing services. This project also covers 7.5% in administrative costs of the ESG program.	HESG	\$145,679.00	\$145,679.00	\$0.00
2	CDBG Program Administration	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.	CDBG	\$234,235.00	\$234,235.00	\$48,338.14
3	Fair Housing Services	In 2021, the City of Lancaster will continue to support the Fair Housing Program. This program receives CDBG Administrative funds to address impediments identified in the 2021 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.	CDBG	\$20,000.00	\$20,000.00	\$6,250.00

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IDIS

Plan IDIS Year Project	Project Title and Description		Program	Amount Available to Draw	Amount Drawn in Report Year
2021 1	ESG21 City of Lancaster (21-22)	Through the joint funding application process, the City will seek homeless service providers who will meet the growing need for emergency shelter, outreach, and rapid rehousing services. This project also covers 7.5% in administrative costs of the ESG program.	HESG	\$145,679.00	\$0.00
2	CDBG Program Administration	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.	CDBG	\$185,896.86	\$48,338.14
3	Fair Housing Services	In 2021, the City of Lancaster will continue to support the Fair Housing Program. This program receives CDBG Administrative funds to address impediments identified in the 2021 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.	CDBG	\$13,750.00	\$6,250.00



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IDIS

Plan IDIS Year Project	Project Title and Description		Program	Project Estimate	Committed Amount	Amount Drawn Thru Report Year
2021 4	Critical Repair and Lead Hazard Reduction Admin (including Lead match)	<p>This project will cover the administrative costs of the City Lead Hazard Reduction Program and Critical Repair Program.</p> <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 leadsafe. 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>	CDBG	\$40,000.00	\$40,000.00	\$0.00
5	Housing Code Enforcement	<p>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.</p>	CDBG	\$358,000.00	\$358,000.00	\$279,413.19

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IDIS

Plan IDIS Year Project	Project Title and Description		Program	Amount Available to Draw	Amount Drawn in Report Year
2021 4	Critical Repair and Lead Hazard Reduction Admin (including Lead match)	<p>This project will cover the administrative costs of the City Lead Hazard Reduction Program and Critical Repair Program.</p> <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 leadsafe. 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>	CDBG	\$40,000.00	\$0.00
5	Housing Code Enforcement	<p>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.</p>	CDBG	\$78,586.81	\$279,413.19

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IDIS

Plan IDIS Year Project	Project Title and Description		Program	Project Estimate	Committed Amount	Amount Drawn Thru Report Year
2021 6	Affordable Housing Development Solutions	<p>The City is committed to exploring and investing in opportunities to increase affordable housing for its community members. The City will be releasing an RFP seeking solutions that might include construction of new housing by a CBDO, homeownership assistance, and acquisition or rehab of existing housing for the purposes of increasing affordable housing.</p> <p>This activity aims to solicit innovative solutions and partnerships to increase affordable housing development. The significant amount allocated to this activity is in alignment with resident input collected during the development of the Consolidated Plan highlighting affordable housing as the most critical issue facing Lancaster City residents. Eligible activities that may be funded within this project include: Acquisition of real property, disposition, clearance, rehabilitation, homeownership assistance, and construction of new housing as a special activity carried out by CBDO's. This project meets the national objective of Low Mod Housing Activities (LMH).</p> <p>Overall, the City of Lancaster is seeking to establish partnerships with mission-driven developers/CBDO's to assist with managing multiple aspects of the affordable housing development process with emphasis on the construction of new affordable housing and rehabilitation of residential/non-residential properties to increase affordable housing.</p>	CDBG	\$453,964.00	\$0.00	\$0.00
7	Place-based Street Scape Improvement	<p>In order for a neighborhood to sustain a strong quality of life for its residents, a well-rounded, resident-lead strategy must be developed to address the myriad of factors driving its success. The Street Improvement Program installs and repairs streets, street drains, storm drains, ADA curbs and gutter, tunnels, bridges, and traffic lights/signs in neighborhood where 51% or more of the residents are low or moderate income.</p>	CDBG	\$225,000.00	\$225,000.00	\$185,707.22

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IDIS

Plan IDIS Year Project	Project Title and Description		Program	Amount Available to Draw	Amount Drawn in Report Year
2021 6	Affordable Housing Development Solutions	<p>The City is committed to exploring and investing in opportunities to increase affordable housing for its community members. The City will be releasing an RFP seeking solutions that might include construction of new housing by a CBDO, homeownership assistance, and acquisition or rehab of existing housing for the purposes of increasing affordable housing.</p> <p>This activity aims to solicit innovative solutions and partnerships to increase affordable housing development. The significant amount allocated to this activity is in alignment with resident input collected during the development of the Consolidated Plan highlighting affordable housing as the most critical issue facing Lancaster City residents. Eligible activities that may be funded within this project include: Acquisition of real property, disposition, clearance, rehabilitation, homeownership assistance, and construction of new housing as a special activity carried out by CBDO's. This project meets the national objective of Low Mod Housing Activities (LMH).</p> <p>Overall, the City of Lancaster is seeking to establish partnerships with mission-driven developers/CBDO's to assist with managing multiple aspects of the affordable housing development process with emphasis on the construction of new affordable housing and rehabilitation of residential/non-residential properties to increase affordable housing.</p>	CDBG	\$0.00	\$0.00
7	Place-based Street Scape Improvement	<p>In order for a neighborhood to sustain a strong quality of life for its residents, a well-rounded, resident-lead strategy must be developed to address the myriad of factors driving its success. The Street Improvement Program installs and repairs streets, street drains, storm drains, ADA curbs and gutter, tunnels, bridges, and traffic lights/signs in neighborhood where 51% or more of the residents are low or moderate income.</p>	CDBG	\$39,292.78	\$185,707.22

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IDIS

Plan IDIS Year Project	Project Title and Description		Program	Project Estimate	Committed Amount	Amount Drawn Thru Report Year
2021 8	Community Facilities Improvements	Public facilities play a large role in the quality of life of its surrounding residents. This activity will be for the rehabilitation of a facility that is designed to serve its neighborhood and that is used for social services.	CDBG	\$75,000.00	\$75,000.00	\$0.00
9	Public Service City Project Manager	This project is designed to support the Department of Neighborhood Engagement in their efforts to improve the quality of life for our community through collaboration and the development of well-rounded, resident-lead strategies.	CDBG	\$80,000.00	\$80,000.00	\$0.00
10	Neighborhood Crime Reduction through Police Social Worker Program	This project supports a community-oriented policing program aimed at preventing crime through engagement and connection.	CDBG	\$87,928.00	\$87,928.00	\$20,792.36
11	Small Business Development	This project provides small business training, mentoring, loans and other technical assistance to lower-income men and women who wish to establish or expand micro-enterprise businesses.	CDBG	\$20,000.00	\$20,000.00	\$0.00
12	Building Codes	This project provides opportunity to build economic opportunity within the community through the support of businesses who in turn provide job opportunities to community.	CDBG	\$150,000.00	\$150,000.00	\$0.00
13	CDBG Program Administration	Direct and Indirect Administration of the CDBG program	CDBG	\$234,235.00	\$0.00	\$0.00

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IDIS

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2021 8	Community Facilities Improvements	Public facilities play a large role in the quality of life of its surrounding residents. This activity will be for the rehabilitation of a facility that is designed to serve its neighborhood and that is used for social services.	CDBG	\$75,000.00	\$0.00
9	Public Service City Project Manager	This project is designed to support the Department of Neighborhood Engagement in their efforts to improve the quality of life for our community through collaboration and the development of well-rounded, resident-lead strategies.	CDBG	\$80,000.00	\$0.00
10	Neighborhood Crime Reduction through Police Social Worker Program	This project supports a community-oriented policing program aimed at preventing crime through engagement and connection.	CDBG	\$67,135.64	\$20,792.36
11	Small Business Development	This project provides small business training, mentoring, loans and other technical assistance to lower-income men and women who wish to establish or expand micro-enterprise businesses.	CDBG	\$20,000.00	\$0.00
12	Building Codes	This project provides opportunity to build economic opportunity within the community through the support of businesses who in turn provide job opportunities to community.	CDBG	\$150,000.00	\$0.00
13	CDBG Program Administration	Direct and Indirect Administration of the CDBG program	CDBG	\$0.00	\$0.00



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Appendix 2

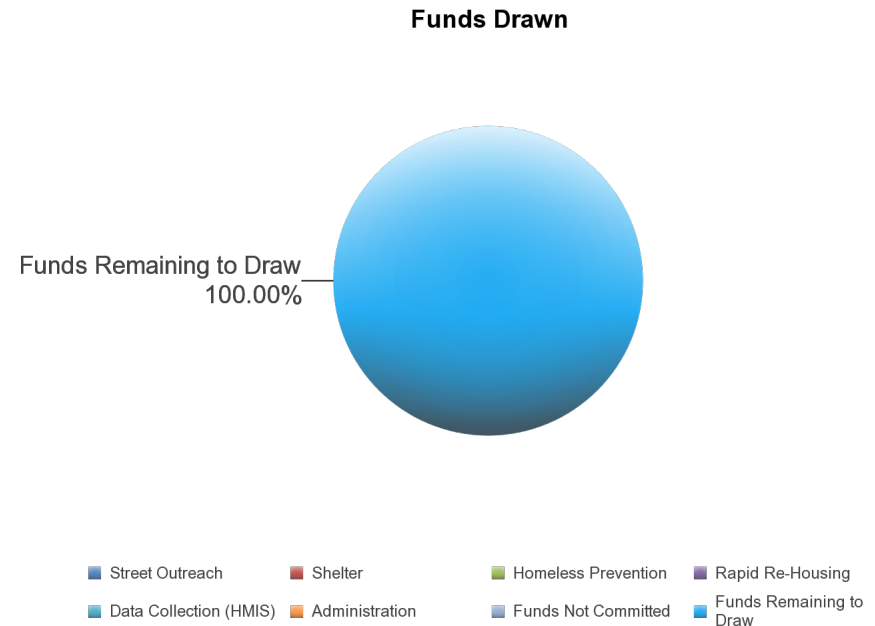
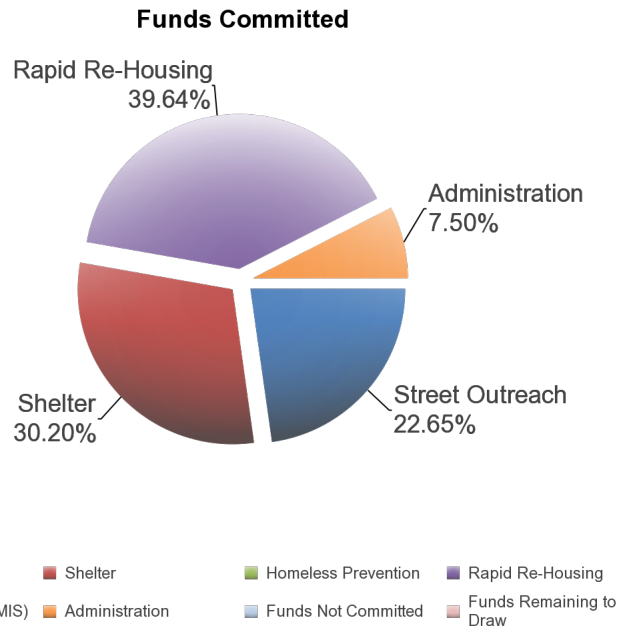
LANCASTER, PA  
2021

ESG Program Level Summary

Grant Number	Total Grant Amount	Total Funds Committed	Total Funds Available to Commit	% of Grant Funds Not Committed	Grant Funds Drawn	% of Grant Funds Drawn	Available to Draw	% Remaining to Draw
E21MC420010	\$145,679.00	\$145,679.00	\$0.00	0.00%	\$0.00	0.00%	\$145,679.00	100.00%

ESG Program Components

Activity Type	Total Committed to Activities	% of Grant Committed	Drawn Amount	% of Grant Drawn
Street Outreach	\$33,000.00	22.65%	\$0.00	0.00%
Shelter	\$44,000.00	30.20%	\$0.00	0.00%
Homeless Prevention	\$0.00	0.00%	\$0.00	0.00%
Rapid Re-Housing	\$57,754.00	39.64%	\$0.00	0.00%
Data Collection (HMIS)	\$0.00	0.00%	\$0.00	0.00%
Administration	\$10,925.00	7.50%	\$0.00	0.00%
Funds Not Committed	\$0.00	0.00%	\$0.00	0.00%
Funds Remaining to Draw	\$0.00	0.00%	\$145,679.00	100.00%
<b>Total</b>	<b>\$145,679.00</b>	<b>100.00%</b>	<b>\$145,679.00</b>	<b>100.00%</b>





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## 24-Month Grant Expenditure Deadline

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

Grant Amount: \$145,679.00

Grant Number	Draws to Date	HUD Obligation Date	Expenditure Deadline	Days Remaining to Meet Requirement Date	Expenditures Required
E21MC420010	\$0.00	08/03/2021	08/03/2023	513	\$145,679.00

## 60% Cap on Emergency Shelter and Street Outreach

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

Amount Committed to Shelter	Amount Committed to Street Outreach	Total Amount Committed to Shelter and Street Outreach	% Committed to Shelter and Street Outreach	2010 Funds Committed to Homeless Assistance Activities	Total Drawn for Shelter and Street Outreach	% Drawn for Shelter and Street Outreach
\$44,000.00	\$33,000.00	\$77,000.00	52.86%		\$0.00	0.00%





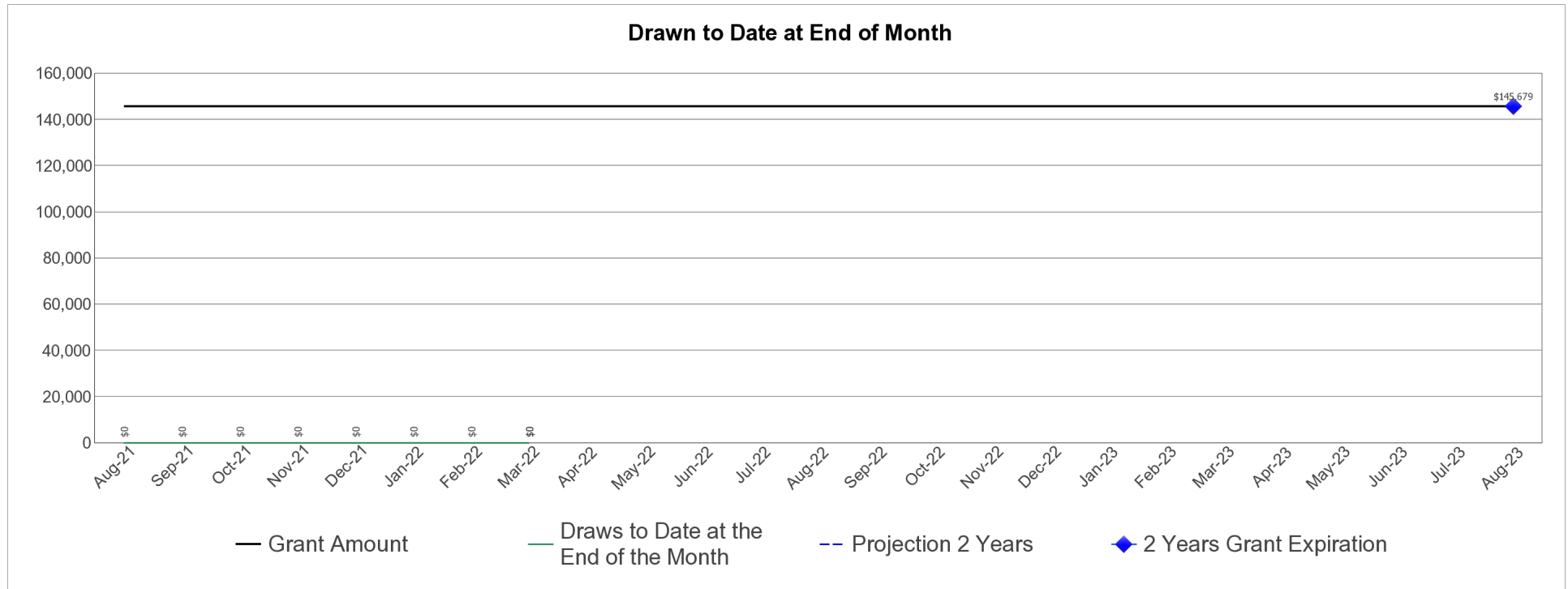
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**ESG Draws By Month (at the total grant level):**

Grant Amount: 145,679.00



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

Quarter End Date	Draws for the Quarter	Draws to Date at the End of the Quarter	% Drawn for the Quarter	% Drawn to Date at End of Quarter
09/30/2021	\$0.00	\$0.00	0.00%	0.00%
12/31/2021	\$0.00	\$0.00	0.00%	0.00%
03/31/2022	\$0.00	\$0.00	0.00%	0.00%



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**ESG Subrecipient Commitments and Draws by Activity Category :**

Subrecipient	Activity Type	Committed	Drawn
LANCASTER	Administration	\$10,925.00	\$0.00
	Total	\$10,925.00	\$0.00
	Total Remaining to be Drawn	\$0.00	\$10,925.00
	Percentage Remaining to be Drawn	\$0.00	100.00%
YWCA	Shelter	\$44,000.00	\$0.00
	Total	\$44,000.00	\$0.00
	Total Remaining to be Drawn	\$0.00	\$44,000.00
	Percentage Remaining to be Drawn	\$0.00	100.00%
TABOR COMMUNITY SERVICES	Street Outreach	\$33,000.00	\$0.00
	Rapid Re-Housing	\$57,754.00	\$0.00
	Total	\$90,754.00	\$0.00
	Total Remaining to be Drawn	\$0.00	\$90,754.00
	Percentage Remaining to be Drawn	\$0.00	100.00%



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**ESG Subrecipients by Activity Category**

Activity Type	Subecipient
Street Outreach	TABOR COMMUNITY SERVICES
Shelter	YWCA
Rapid Re-Housing	TABOR COMMUNITY SERVICES
Administration	LANCASTER

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Subrecipient	Activity Type	IDIS Activity ID	Activity Name	Voucher Number	Voucher Line Item	Paid Date	Drawn Amount
LANCASTER	Administration	1884	ESG20 Administration	6429229	1	11/10/2020	\$2,055.41
				6432521	8	11/24/2020	\$1,627.20
				6444110	1	12/29/2020	\$1,263.22
				6455323	10	2/2/2021	\$1,712.84
				6462107	13	2/20/2021	\$1,712.99
				6471931	15	3/17/2021	\$1,643.48
				6495329	1	5/21/2021	\$928.86
TABOR COMMUNITY SERVICES	Rapid Re-Housing	1883	ESG20 Rapid Rehousing	6512551	18	7/2/2021	\$103,698.69
				6529488	17	8/17/2021	\$24,562.50
				6545295	17	9/25/2021	\$2,995.81
				6601348	33	3/5/2022	\$3,728.00
<b>Total</b>							<b>\$145,929.00</b>

2016

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>



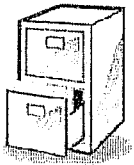
# Homeless Definition

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

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	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.



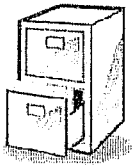
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	Category 2	Imminent Risk of Homelessness	<p>(2) Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ul style="list-style-type: none"> <li>(i) Residence will be lost within 14 days of the date of application 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>
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# At Risk of Homelessness

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# Appendix C

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

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

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

Section 214 regulates the following HUD funded programs:

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

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

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

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

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

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

The full text of this law can be found at:

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



# Appendix D

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

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

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

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

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

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

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

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

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

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

Examples for services listed as meeting these criteria are:

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

# Appendix E

## DEFINITIONS FOR LANCASTER COUNTY WRITTEN STANDARDS AND POLICIES

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

### **Chronically Homeless**

(a) An individual who:

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

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

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

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

**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.](#)).

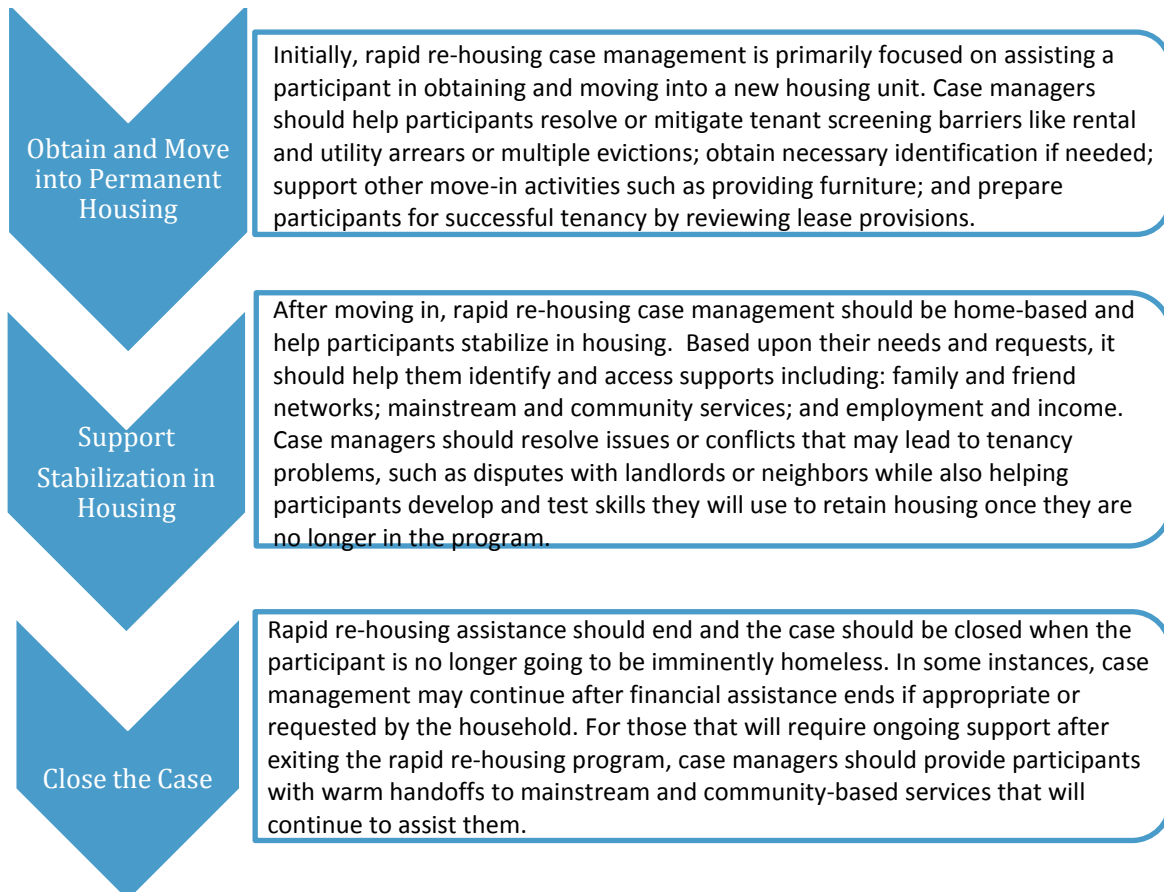
### Examples of Meeting Program Standards: Rent and Move-In Assistance

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.



HUD ESG CAPER

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

Report Date Range  
1/1/2021 to 12/31/2021

Contact Information

First Name Simone  
Middle Name  
Last Name Dia  
Suffix  
Title  
Street Address 1 120 N. Duke Street  
Street Address 2  
City Lancaster  
State Pennsylvania  
ZIP Code 17608  
E-mail Address sdia@cityoflanasterpa.com  
Phone Number (717)291-4743  
Extension  
Fax Number 0-

Project types carried out during the program year

Components	Projects	Total Persons Reported	Total Households Reported
Emergency Shelter	1	44	16
Day Shelter	0	0	0
Transitional Housing	0	0	0
Total Emergency Shelter Component	1	44	16
Total Street Outreach	2	185	185
Total PH - Rapid Re-Housing	2	157	78
Total Homelessness Prevention	0	0	0

Grant Information

Emergency Shelter Rehab/Conversion

Did you create additional shelter beds/units through an ESG-funded rehab project No  
Did you create additional shelter beds/units through an ESG-funded conversion project No

Data Participation Information

Are there any funded projects, except HMIS or Admin, which are not listed on the Project Links and Uploads form? This includes projects in the HMIS and from VSP No  
How many of the VSP projects have a HUD approved plan and are using a template rather than a comparable database report uploaded? 0

Project Outcomes

- no data -



## ESG Information from IDIS

As of 3/4/2022

FY	Grant Number	Current Authorized Amount	Funds Committed By Recipient	Funds Drawn	Balance Remaining	Obligation Date	Expenditure Deadline
2021	E21MC420010	\$145,679.00	\$145,679.00	\$0	\$145,679.00	8/3/2021	8/3/2023
2020	E20MC420010	\$145,929.00	\$145,929.00	\$145,929.00	\$0	7/14/2020	7/14/2022
2019	E19MC420010	\$142,487.00	\$142,487.00	\$142,286.00	\$201.00	8/13/2019	8/13/2021
2018	E18MC420010	\$139,155.00	\$139,155.00	\$139,155.00	\$0	8/22/2018	8/22/2020
2017	E17MC420010	\$141,883.00	\$141,883.00	\$141,883.00	\$0	10/19/2017	10/19/2019
2016	E16MC420010	\$140,679.00	\$140,679.00	\$140,679.00	\$0	7/14/2016	7/14/2018
2015	E15MC420010	\$139,052.00	\$139,052.00	\$139,052.00	\$0	6/24/2015	6/24/2017
Total		\$1,121,503.00	\$1,121,503.00	\$975,623.00	\$145,880.00		

Expenditures	2021 No	2020 Yes	2019 Yes	2018 No	2017 No	2016 No	2015 No
Homelessness Prevention		FY2020 Annual ESG Funds for Non-COVID	FY2019 Annual ESG Funds for Non-COVID				
Rental Assistance							
Relocation and Stabilization Services - Financial Assistance							
Relocation and Stabilization Services - Services							
Hazard Pay (unique activity)							
Landlord Incentives (unique activity)							
Volunteer Incentives (unique activity)							
Training (unique activity)							
Homeless Prevention Expenses		0.00	0.00	0.00	0.00		
		FY2020 Annual ESG Funds for	FY2019 Annual ESG Funds for				
		Non-COVID	COVID	Non-COVID	COVID		
Rapid Re-Housing							
Rental Assistance							
Relocation and Stabilization Services - Financial Assistance							
Relocation and Stabilization Services - Services		134,985.00	81,232.22				
Hazard Pay (unique activity)							
Landlord Incentives (unique activity)							
Volunteer Incentives (unique activity)							
Training (unique activity)							
RRH Expenses		134,985.00	0.00	81,232.22	0.00		
		FY2020 Annual ESG Funds for	FY2019 Annual ESG Funds for				
		Non-COVID	COVID	Non-COVID	COVID		
Emergency Shelter							
Essential Services							
Operations							
Renovation							
Major Rehab							
Conversion							
Hazard Pay (unique activity)							
Volunteer Incentives (unique activity)							
Training (unique activity)							
Emergency Shelter Expenses		0.00	0.00	0.00	0.00		
		FY2020 Annual ESG Funds for	FY2019 Annual ESG Funds for				
		Non-COVID	COVID	Non-COVID	COVID		
Temporary Emergency Shelter							
Essential Services							
Operations							
Leasing existing real property or temporary structures							
Acquisition							
Renovation							
Hazard Pay (unique activity)							
Volunteer Incentives (unique activity)							
Training (unique activity)							
Other Shelter Costs							
Temporary Emergency Shelter Expenses			0.00		0.00		
		FY2020 Annual ESG Funds for	FY2019 Annual ESG Funds for				
		Non-COVID	COVID	Non-COVID	COVID		
Street Outreach							
Essential Services							
Hazard Pay (unique activity)							
Volunteer Incentives (unique activity)							
Training (unique activity)							
Handwashing Stations/Portable Bathrooms (unique activity)							
Street Outreach Expenses		0.00	0.00	0.00	0.00		
		FY2020 Annual ESG Funds for	FY2019 Annual ESG Funds for				
		Non-COVID	COVID	Non-COVID	COVID		
Other ESG Expenditures							
Cell Phones - for persons in CoC/YHDP funded projects (unique activity)							
Coordinated Entry COVID Enhancements (unique activity)							



Vaccine Incentives (*unique activity*)

HMIS

Administration

Other Expenses

4,285.33

4,285.33

0.00

0.00

0.00

FY2020 Annual ESG Funds for  
Non-COVID COVID

FY2019 Annual ESG Funds for  
Non-COVID COVID

Total Expenditures

139,270.33

0.00

81,232.22

0.00

Match

4,285.33

Total ESG expenditures plus match

143,555.66

81,232.22

Total expenditures plus match for all years

224,787.88

City of Lancaster, Pennsylvania  
Department of Economic and Community Development

## CITIZEN PARTICIPATION PLAN

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

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

\*\*\*\*\*

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

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

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

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

## CITIZEN PARTICIPATION PLAN – REQUIRED ELEMENTS

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

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

#### Phase One: Announcement of the Consolidated Plan Development Process

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

#### Phase Two: Community Briefings and Hearings

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

### Phase Three: Release of Funding Applications

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

### Phase Four: Citizen Review of Funding Applications

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

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

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

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

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

#### Phase Five: Plan Advertisement and Public Hearing Presentation

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

#### Phase Six: Official Adoption of the Plan

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

#### Phase Seven: Submission of the Plan to HUD

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

#### Phase Eight: Implementation

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

## B. Program Amendments

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

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

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

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

## C. Performance

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

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

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

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

2. Performance Reviews

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

3. Public Meetings on Program Performance

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

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

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

D. Comments or Complaints Regarding the Consolidated Grant Program

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

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

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

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

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

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

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

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



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

City of Lancaster, Pennsylvania

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

UNDERSTANDING LANCASTER'S 'CONSOLIDATED PLAN'

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

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

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

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

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

Goal One: Provide Decent Housing

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

Goal Two: Provide a Suitable Living Environment

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

Goal Three: Expand Economic Opportunities

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

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

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

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

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

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

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

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

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

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

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

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

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

Account: <b>218465</b>	Ad ID: <b>4437668</b>
Client Type: <b>LT</b>	Description: <b>PUBLIC NOTICE Notice of a Public Rev</b>
Name:	Run Dates: <b>03/11/22 to 03/11/22</b>
Company: <b>CITY OF LANCASTER</b>	Class: <b>107</b>
Address: <b>HOUSING &amp; NEIGHBORHOOD REVI-</b>	Orig User: <b>KMCKILLIPS</b>
<b>TALIZATION</b>	Lines: <b>70</b>
<b>120 N DUKE ST, PO BOX 1599</b>	Agate Lines: <b>125</b>
<b>LANCASTER, PA 17608-1599</b>	Inserts: <b>1</b>

Other Charges:	<b>\$48.00</b>	Gross:	<b>\$395.20</b>
Discount:	<b>\$0.00</b>		
Surcharge:	<b>\$0.00</b>	Paid Amount:	<b>- \$0.00</b>
Credits:	<b>\$0.00</b>		
Bill Depth:	<b>8.986</b>	Amount Due:	<b>\$395.20</b>

Notes: 3/11

**PUBLIC NOTICE  
Notice of a Public  
Review and Comment  
Period for  
Lancaster City's  
Draft 2021  
CONSOLIDATED  
ANNUAL  
PERFORMANCE AND  
EVALUATION REPORT  
(CAPER)**

The City of Lancaster's draft Consolidated Annual Performance and Evaluation Report (CAPER) describes the performance of activities funded in 2021 under the Federal Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG) Programs.

A copy of the 2021 CAPER is available on the City's website at <https://www.cityoflanasterpa.com/departments/departments-of-community-planning-economic-development/health-housing-community-development-division/bureau-of-lead-safety-community-development/> under the "DOCUMENTS AND RESOURCES" tab and at City Hall, 120 North Duke Street, Lancaster, PA 17602.

The City will accept citizen comments regarding the CAPER for 16 days (from today, March 11, 2022, to March 27, 2022). Persons interested in commenting on

the CAPER should contact the Department of Community Planning and Economic Development (CPED), Monday – Friday between the hours of 8:30 a.m. and 5:00 p.m. at the following:

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

Phone: (717) 291 – 4708 or (717) 291 – 4743

Email: [BMcGowan@cityoflanasterpa.com](mailto:BMcGowan@cityoflanasterpa.com) or [SDia@cityoflanasterpa.com](mailto:SDia@cityoflanasterpa.com)

If you are a person with language access needs, please contact Brynn McGowan or Simone Dia at the above contact information for special accommodations.

Danene Sorace  
Mayor

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

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

INCOME AND BENEFITS			
	Count	Percent	Margin of Error
<b>Total Households</b>	<b>22,092</b>	<b>22,092</b>	<b>±549</b>
Less than \$10,000	2,202	10.0%	±1.6
\$10,000 to \$14,999	1,438	6.5%	±1.2
\$15,000 to \$24,999	2,777	12.6%	±1.7
\$25,000 to \$34,999	2,291	10.4%	±1.5
\$35,000 to \$49,999	3,200	14.5%	±1.6
\$50,000 to \$74,999	4,015	18.2%	±1.7
\$75,000 to \$99,999	3,022	13.7%	±1.6
\$100,000 to \$149,999	1,981	9.0%	±1.3
\$150,000 to \$199,999	772	3.5%	±0.8
\$200,000 or more	394	1.8%	±0.5
<b>Income and Benefits - Median Household Income (dollars)</b>	<b>\$ 45,514.00</b>		<b>± \$ 2,838</b>
<b>Income and Benefits - Mean Household Income (dollars)</b>	<b>\$ 57,768.00</b>		<b>± \$ 1,873</b>

EMPLOYMENT STATUS			
	Count	Percent	Margin of Error
Population 16 years and over	47,397	100%	±572
Total Population in Labor Force	31,921	67.3%	±770
Employed	29,615	62.5%	±778
<b>Unemployed</b>	<b>2,291</b>	<b>4.8%</b>	<b>±399</b>

SOURCE OF INCOME AND BENEFITS			
With earnings (Count of Population)	17,904	81.0%	±544
Mean earnings (dollars)	\$ 59,165.00	± \$	2,079
With Social Security (Count of Population)	5,969	27.0%	±421
Mean Social Security income (dollars)	\$ 16,019.00	± \$	898
With retirement income (Count of Population)	2,450	11.1%	±286
Mean retirement income (dollars)	\$ 17,047.00	± \$	2,174
With Supplemental Security Income (Count of Population)	2,630	11.9%	±250
Mean Supplemental Security Income (dollars)	\$ 8,741.00	± \$	764
With cash public assistance income (Count of Population)	1,581	7.2%	±277
Mean cash public assistance income (dollars)	\$ 2,890.00	± \$	479

HEALTH INSURANCE			
		Percent	Margin of Error
<b><u>Employed:</u></b>			
With health insurance coverage	✓	89.6%	±803
With private health insurance	✓	75.1%	±778
With public coverage	✓	18.3%	±549
No health insurance coverage	✓	10.4%	±400
<b><u>Unemployed:</u></b>			
With health insurance coverage	✓	70.6%	±290
With private health insurance	✓	17.1%	±131
With public coverage	✓	54.6%	±258
No health insurance coverage	✓	29.4%	±184
<b><u>Not in labor force:</u></b>			
With health insurance coverage	✓	91.7%	±468
With private health insurance	✓	32.7%	±315
With public coverage	✓	65.9%	±414
No health insurance coverage	✓	8.3%	±188



**PERCENTAGE OF FAMILIES AND PEOPLE WHOSE INCOME IN THE PAST 12 MONTHS IS BELOW THE POVERTY LEVEL**

**All Families**

With related children of the householder under 18 years

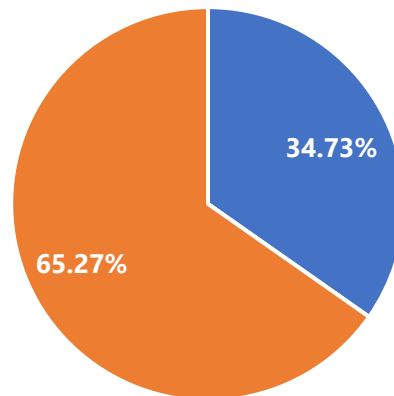
Married couple families

Families with female householder, no spouse present

Percent	Margin of Error
18.5%	±2.2%
28.5%	±4.0%
7.3%	±1.9%
36.5%	±6.4%

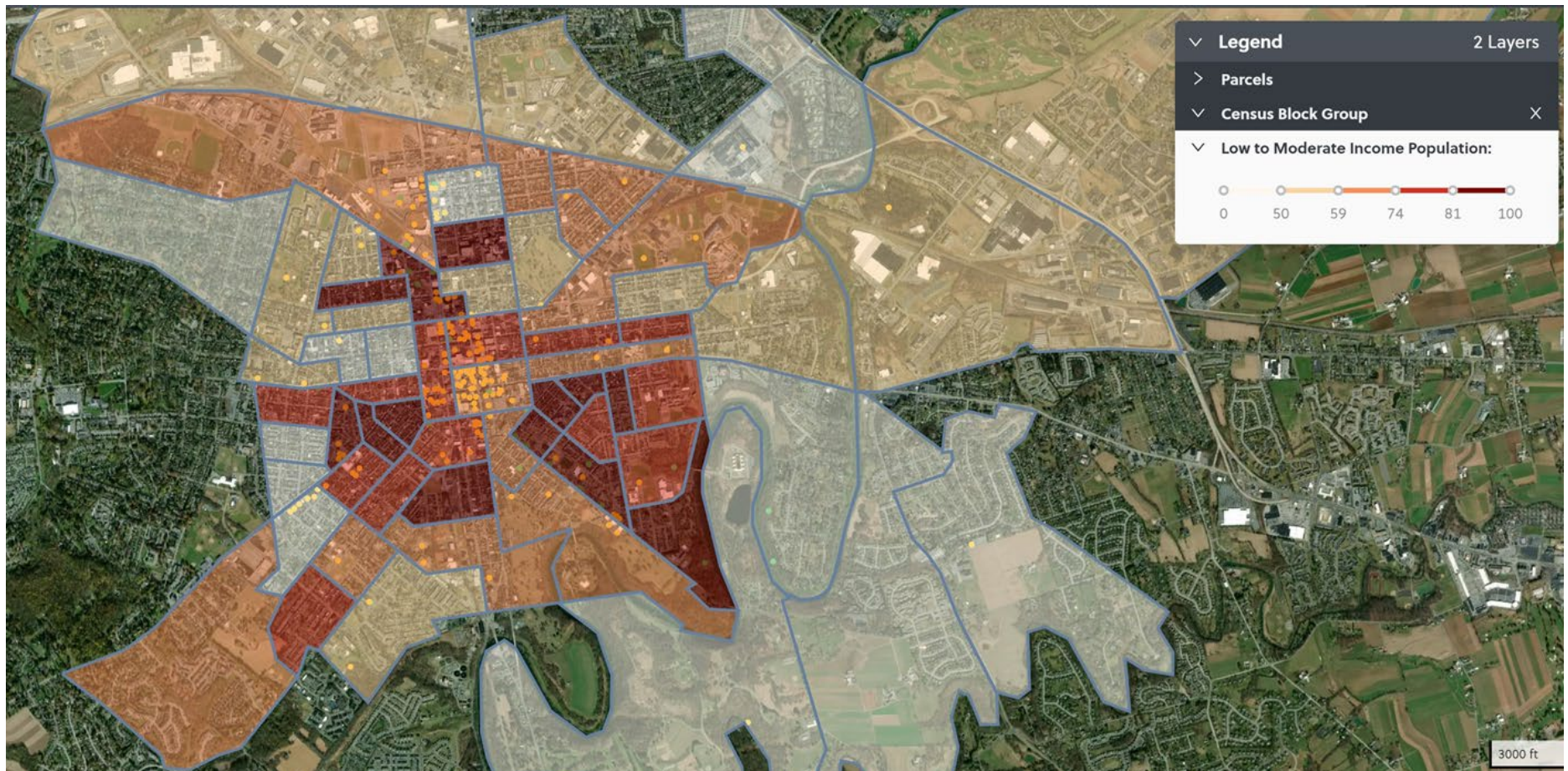
## Housing Cost Burden - City of Lancaster, PA

(U.S. Census Bureau, 2019 American Community Survey)



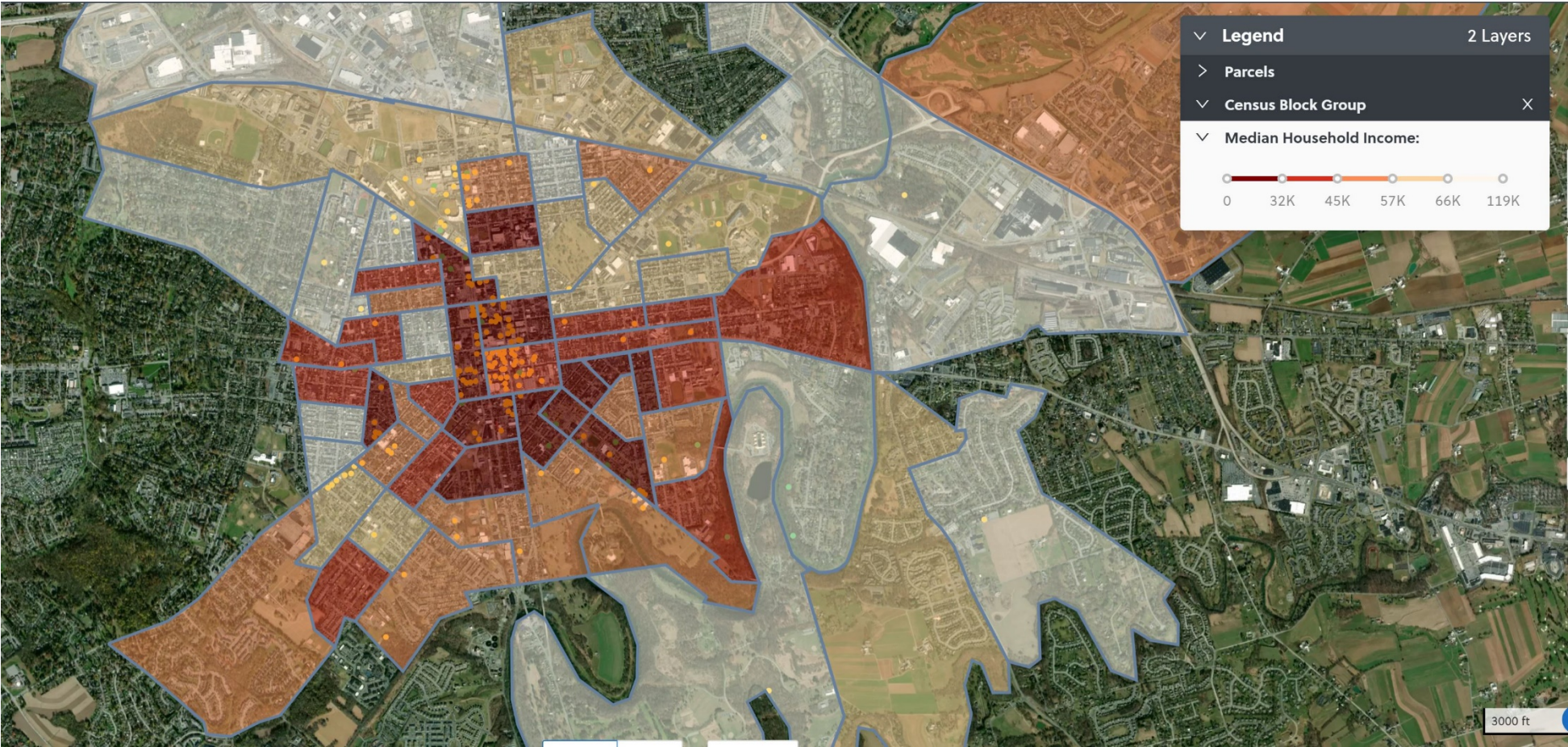
- Percentage of Households with a Housing Cost Burden (30% or more of income goes to housing)
- Percentage of Households without a Housing Cost Burden (less than 30% of income goes to housing)

*City of Lancaster – Low- and Moderate-Income Population Distribution*





City of Lancaster – Median Household Income Distribution





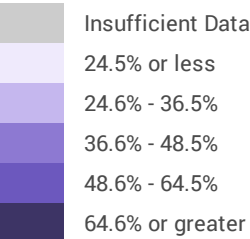
# Percent of population below the area low and moderate income threshold in FY2019.

Percent of the population with low and moderate incomes in the area in FY2019. Low and moderate income individuals are defined as residents of households with income below 80% of Area Median Income. Percents were suppressed in cases where the number of individuals in the area was less than 11. Income calculations come from the 2011-2015 American Community Survey and HUD Income Limits for Metropolitan Areas and Non Metropolitan Counties. Areas with insufficient data are marked in gray on the map.

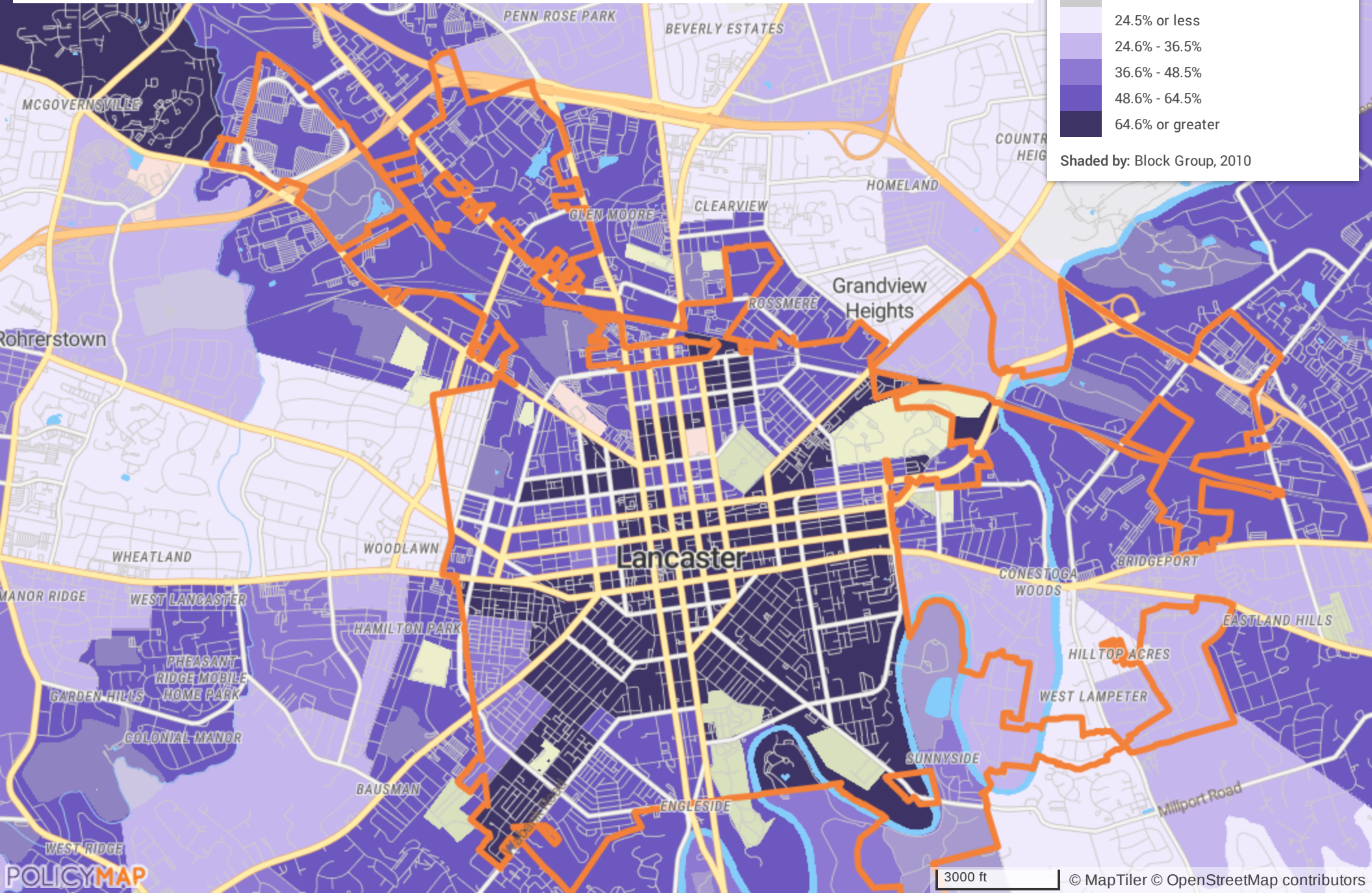
Percent of Low Mod Income Persons

Source: HUD

Year: 2019



Shaded by: Block Group, 2010



A faint, light gray map of Lancaster, Pennsylvania, serves as a background for the title page. The map shows the city's irregular shape, including its various streets and surrounding areas.

# ***HOUSING AVAILABILITY IN THE CITY OF LANCASTER AND IMPLICATIONS FOR HOUSING AFFORDABILITY***

*PREPARED FOR:*

City of Lancaster, PA

*PREPARED BY:*

Center for Regional Analysis  
at Economic Development Company  
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*FINAL REPORT:*

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## KEY FINDINGS

The City of Lancaster commissioned the Center for Regional Analysis (CRA) to conduct an analysis of housing affordability in the rental market for wage earners.

The analysis relied on three key sources of data: (1) parcel data; (2) Census Bureau data and (3) the City's rental license database. Using these data sources, CRA analyzed the rental housing market from both the supply and demand sides to understand their relative importance in impacting housing affordability.

Five key insights emerged from the analysis.

### *FINDING #1.*

*Housing affordability is caused by demand and supply dynamics. Solutions need to address both.*

Implications:

- *On the supply side, housing stock acts as a constraint on the City's population growth.*
- *On the demand side, housing cost burden is wide-spread, largely a result of household incomes.*
- *The two dynamics act as barriers to market driven solutions. Shortage drives prices up, and incomes are not adequate to meet market prevailing rental rates.*

### *FINDING #2.*

*The City of Lancaster has a housing shortage.*

The City has approximately 24,300 housing units. The City's population is 22,100 households. This suggests

that 9% of the City's housing units (2,200) are vacant. This vacancy rate overstates the availability of housing supply. The housing estimate does not reflect several important factors such as: (1) how the housing stock is divided between rental and homeownership markets; (2) how quality reduces the housing supply; and (3) how well housing supply matches the needs of City residents. These factors contribute to more acute shortages in some markets and for some populations.

Data points:

- *The City has 22,100 households, occupying 91% of the City's housing stock. This suggests 9% or 2,200 of the City's housing units are not occupied. However, the Census Bureau estimates the City's housing vacancy rate is 2.2% in the homeowner market (220 unoccupied units) and 2.5% in the rental market (320 vacant units). This level of vacancy is very low. 5-10% is considered a healthy vacancy rate, suggesting the City needs an additional 1,165-2,455 housing units (660 to 1,388 in the rental market and 505-1,070 in the homeownership market).*

Implications:

- *Without significantly expanding the City's housing stock, the price pressure will continue to rise.*
- *This shortage, when coupled with the income profile of the City's current residents, amplifies the housing affordability challenge.*
- *Over the medium to long term, the implications of a sustained tight housing market are to either cause displacement (as a result of gentrification) or create incentives for housing stock to be run down (particularly in the rental market). More*



*plainly, lower income residents may be priced out of the City's market and owners of rental properties will not feel market pressure to continuously invest in maintenance and capital improvements to preserve the property's appeal.*

### FINDING #3.

*The City's housing stock does not align with the household composition of its residents.*

#### Data points:

- *Over half of the City's housing stock (56%) is comprised of single-family dwelling, with 83% of these units having three or more bedrooms. In contrast, only 30% of the City's households have children under the age of 18.*
- *22% of the City's housing units are estimated to have one bedroom, but 30% of the City's households live alone.*

#### Implications:

- *This misalignment likely exacerbates the aggregate housing shortage and housing cost burden – particularly for households with single income earners (which are the most economically vulnerable).*
- *To meet the current population's housing needs, the City's housing stock requires more one- and two-bedroom units.*
- *With an awareness that transforming the City's housing stock takes time, the City can respond to current demand and plan for future needs through policies that influence the type and size*

*of existing and future housing stock. For example, expanding the supply of multi-family dwellings and large apartment buildings (comprised of one and two bedrooms) will supplement housing for non-family residents. Increasing the availability of smaller single-family housing could better align with the size and composition of current and future families living in the City.*

### FINDING #4.

*The opportunities to increase housing supply are limited.*

The City is highly residential. The extensive integration of housing throughout the City suggests that intentional redevelopment at a substantial scale is needed to ease or eliminate the housing shortage.

#### Data points:

- *An estimated 88% of the City's parcels have some form of housing on it.*

#### Implications:

- *As long as there is demand – or interest – in living in the City, limited housing stock will place upward pressure on the cost of housing.*
- *The City needs intentionality in developing housing stock with a focus on large scale projects.*
- *Intentional development in combination with land use and zoning policy that facilitates housing density are critical to significantly increase housing availability. Small changes in zoning requirements will have limited potential to materially change the supply. Both the rehabilitation of existing low to*

*moderate density housing units and building more medium and high density housing units where feasible are important.*

#### **FINDING #5.**

*Housing cost burden is widespread reflecting the income profile of City residents.*

Median household income in 2019 was \$45,570. This level of income suggests monthly housing costs of \$1,140 (rent or mortgage) imposes a housing cost burden for half of the City's households. When considering that income distribution looks different based on household composition, the threshold is lower. Nearly 67% of the City's households are comprised of one individual or family with one head of household, suggesting they have a single income earner. Over half of these households (7,850 households) had annual incomes of less than \$35,000. For these households, the City's median rent of \$870 exceeds the 30% threshold. The net effect is that one-third of the City's households are housing cost burdened.

Data points:

- *According to US Census data, median household income in 2019 was \$45,570. However, income distribution varies significantly by household type: for families, \$57,800, and married couples, \$72,900; and for nonfamilies, \$33,200. Nonfamily households represent 40% of all households in the City.*
- *One-third of the City's households are housing cost burdened, and almost half of all renting households are estimated to pay at least 30% of their gross income to rent.*

- *Median rent is \$870 but varies across the City sections (\$795 in the Southeast Quadrant to \$975 in the Northwest Quadrant). An additional 20-35% of renters paid between \$1,000 and \$1,499 per month.*

- *Across sections of the City, the share of households burdened by housing costs ranges from 41% in the Northwest Quadrant to as high as 56% in the Southeast Quadrant.*

Implications:

- *The housing shortage is a challenge for a wide range of household incomes, not just the lowest income.*
- *Household incomes are not adequate to meet market rental rates.*

## **Conclusions**

Affordable housing in the City of Lancaster is a real challenge as a result of both supply and demand dynamics. This analysis starts with the view that housing is infrastructure. Its "fixed," physical nature requires longer time horizons to shape and expand it. In contrast, household demand is more adaptive and responsive, because households are mobile. A household's (potential) ability to move suggests that, at least in the short run, the quality, composition and quantity of housing drives the scale of demand (resulting in vacancies and price pressure). More research is needed to understand which segments of the population are most mobile and how housing choices are influenced by price and location. Nearly 80% of the City's

residents reported living in the same residence a year ago, suggesting that in any given year 20% of the population changed residence. Residential mobility varies across the City, largely correlated with the type of housing and prevalence of rental units.

With this in mind, conclusions emerge that impact the pathways for addressing housing in the City. They are as follows:

- *Many city households have incomes too low to afford prevailing rental rates without being housing cost burdened. The rental rates are driven by a range of factors. For new construction, particularly for apartment buildings, the rental rates reflect high fixed costs of land development and building construction. For older, multi-family housing which makes up a large portion of rental housing market, the rental rates generally reflect a scarcity of housing.*
- *Increasing housing supply could alleviate price pressure but would require a significant shift in supply. Absent potential to strongly raise incomes, increasing supply is a likely key market driver.*
- *Because housing stock requires such a substantial increase, the City has an opportunity to think critically about how it can transform housing to meet the needs of its residents and shape physical development in response to anticipated population growth in the metro region.*

# HOUSING STOCK

## Aggregate Supply

Lancaster City has nearly 18,300 parcels occupying 4,800 acres. Based on the County's land use categories, the vast majority of parcels are designated for residential purposes (88% or 16,040 parcels). From an acreage lens, residential land use accounts for less than one-quarter of the City's footprint.

To characterize the availability of housing in the City, the analysis divides the City into six sections (shown on the map). The sections divide the City into four quadrants plus an corridor that accounts for the "downtown" or business district and a satellite area. These sections are constructed using information in the County parcel data which divides the City of Lancaster into 12 areas (identified as wards and annexes).

## Type of Housing

The City's housing supply is varied in composition and distribution. This analysis categorizes housing units into several categories, ranging from single family buildings to multi-family buildings (on parcels zoned as residential) to apartments (which are mainly found on parcels zoned mixed use, commercial or retail). Figure 2 summarizes how housing units are distributed across the housing categories and city sections.

Figure 1

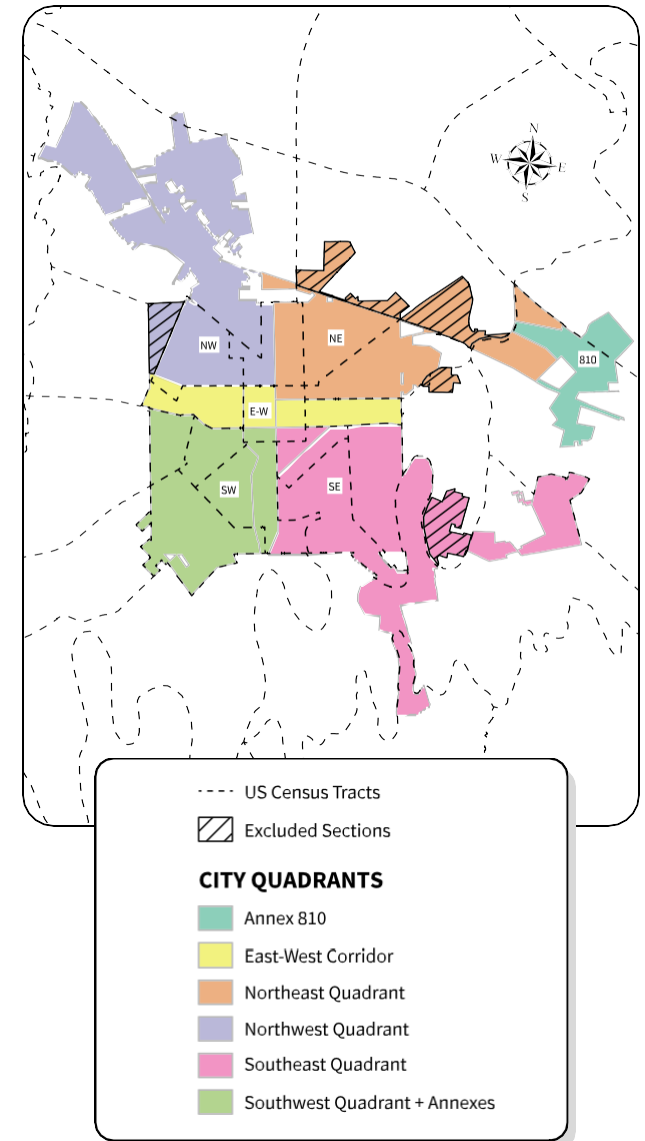


Figure 2

TYPES OF HOUSING BY CITY SECTION							
HOUSING TYPE	ANNEX 810	E-W	NE	NW	SE + ANNEX	SW	TOTAL
SINGLE FAMILY	158	1,424	2,708	1,409	2,888	5,030	13,617
TWO-FAMILY		496	503	358	329	558	2,244
THREE-FAMILY		279	285	219	131	194	1,108
FOUR-FAMILY		114	153	120	53	45	485
FIVE+ FAMILY		204	176	63	38	52	533
CONDO		324	63	69	4		460
APARTMENT	213	1,032	938	878	1,570	1,128	5,759
OTHER 500*		14	5	35	13	45	112
<b>TOTAL UNIT COUNT</b>	<b>371</b>	<b>3,887</b>	<b>4,831</b>	<b>3,151</b>	<b>5,026</b>	<b>7,052</b>	<b>24,318</b>
<b>% OF HOUSING UNITS</b>	<b>2%</b>	<b>16%</b>	<b>20%</b>	<b>13%</b>	<b>21%</b>	<b>29%</b>	<b>100%</b>

### Single-family – Detached or Attached

Single family housing (detached or attached, such as row home or townhouse) represents the largest category of housing in Lancaster City. 56% of housing units fall into this category. Across the six sections of the City, this type of housing varies in concentration. The Southwest section of the City is dominated by single family housing (71%). The lowest concentration is found in the East-West Corridor (37%) which includes the City's downtown.

This type of housing tends to be larger in terms of the number of bedrooms. Over half are estimated to have three bedrooms. Another 18% have four bedrooms. Less than 20% are estimated to have two or fewer bedrooms.

### Multi-family Dwellings

This category captures housing on residential parcels where the building has multiple units, such as two- and three-family buildings or a detached single family house that has been broken up into several units. Housing in this category differs from apartments and condominiums. Apartments tend to be in buildings that are much larger than multi-family dwellings. Multi-family dwellings are different from condominiums given their ownership structure even though they may visually look similar. Multi-family dwellings have a one-to-many relationship for parcels to housing units. Condominiums have a one-to-one relationship between the parcel and housing unit. In other words, each condominium unit has its

own unique parcel number, while located in the same building with other condominium units. For example, 101 North Queen St has mixed use, with condominiums. Each condominium in this building has its own unique parcel number. In contrast, a three-family building on West End Ave will have a single parcel number, while still being comprised of three distinct housing units.

The default assumption in this analysis is that each multi-family dwelling has one owner-occupied unit, with the remaining units available in the rental market. This assumption is modified where information exists from the City's rental database.

Multi-family dwellings represent 18% of the City's housing units. Although found throughout the City, they are more intensely present in the Northwest, Northeast and East-West Corridor. In these three sections of the City, they make up anywhere from 23% to 28% of the housing units. In the southern half of the City, multi-family dwellings are less frequently found, making up only 11% to 12% of the housing stock.

Housing units in multi-family dwellings tend to be comparable to apartments, predominantly offering one and two-bedroom units.

### *Apartments*

Apartments account for just under one-quarter of the City's housing stock. Defined as housing units found on parcels with land uses other than residential, apartments are typically found in buildings with a large number of housing units. This analysis assumes apartments are in the rental market because they are managed in a structure that does not allow home ownership (unlike condominiums and townhouses). The availability of apartment housing varies across the City. This type of housing is most prevalent in the Southeast, representing 31% of its housing units. In the East-West Corridor and Northwest, apartments account for roughly 27% of the available housing. They have the lowest share of housing units in the Southwest and Northeast (16% and 19%, respectively).

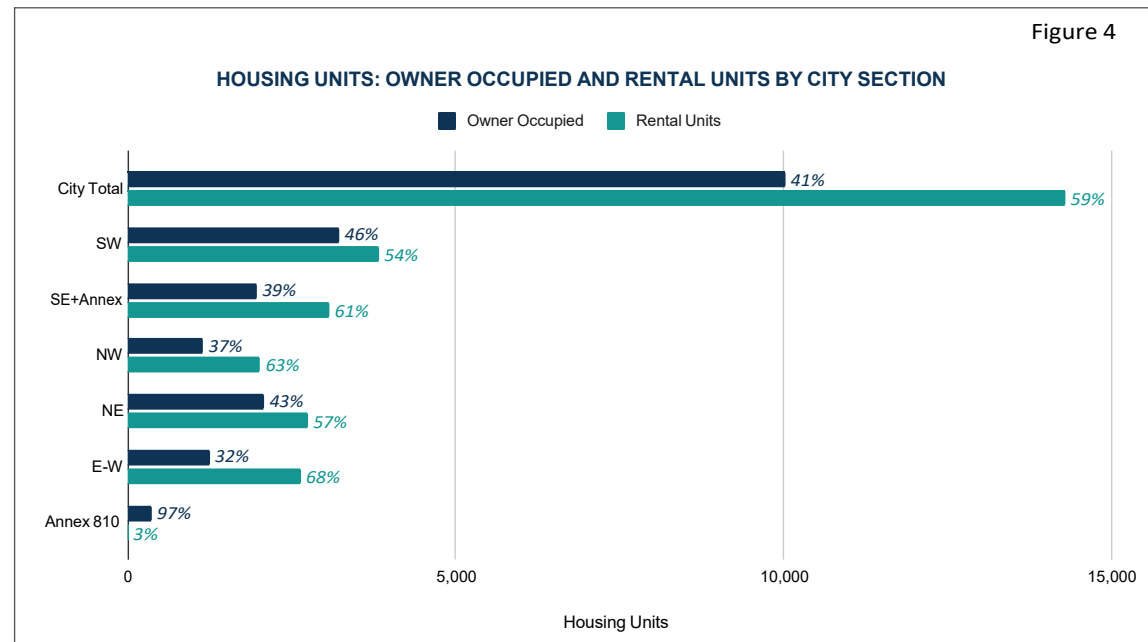
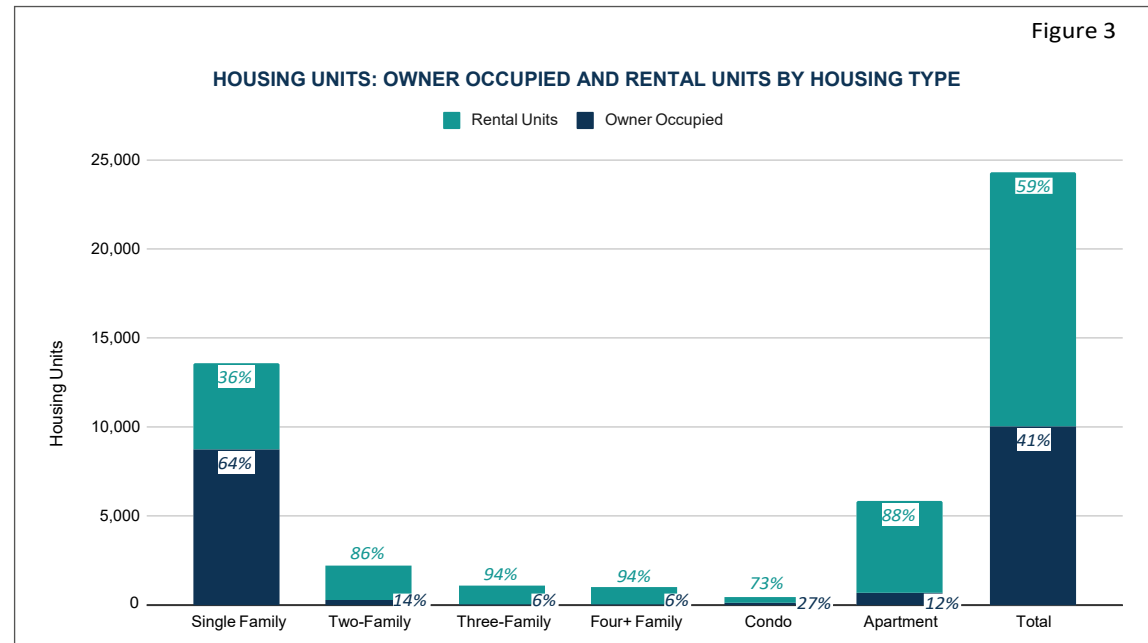
The County's parcel data has limited information on the number of bedrooms in each housing unit. As a result, this analysis draws on the information recorded with each parcel in combination with the information from the US Census Bureau's American Community Survey (ACS). Collectively the two data points suggest just over half of the apartments and multi-family dwellings are two-bedrooms. One-bedroom units make up 36% of apartments and multi-family units, and 9% are efficiencies.

## Rental Market

Nearly 60% of the City's housing stock is estimated to be in the rental market. These charts illustrate how the concentration of rental housing varies by the type of housing and location.

By housing type (Figure 3), the rental market is highest in multi-family dwellings and apartments. In contrast, the owner-occupied rate for single family housing is roughly 64% across the City.

By City section (Figure 4), the owner-occupied rates of housing ranges from 32% in the East-West Corridor to 46% in the Southwest and 97% in Annex 810. As noted previously, the availability of single family dwellings plays an important factor in the rate of owner-occupied housing units. In the Southwest Quadrant and Annex 810, single family dwellings make up a substantial portion of the housing units. In the East-West Corridor, multi-family buildings and apartments account for the majority of housing units.



# IMPLICATIONS OF EXISTING HOUSING STOCK

Healthy housing markets are the result of both supply- and demand-side factors. Supply-side conditions reflect the amount and type of housing units. The demand-side takes into account the needs and resources that City residents have for housing.

In the City of Lancaster, supply-side factors feature prominently in the challenges of affordable housing, but are not the sole contributing factors. The shortage of specific types of housing exacerbates conditions, fueling higher housing costs (in rental and home ownership markets). At the same time, the income profiles of the City’s household population are also at play. They amplify the problem of affordable housing and the widespread prevalence of housing cost burden among City residents. These challenges can be more acute in some parts of the City given the diversity and variation of residents and housing across the City’s section.

## Housing Stock by City Section

To understand both sides of the housing affordability equation, the analysis draws on two data sets. The County parcel data provides a basis for characterizing the total supply of housing and how it is distributed across the City. The 2019 data from the American Community Survey (ACS) provides the most readily available information on the City’s population, detailing estimates that help characterize household composition and incomes.

The two data sources use different geographic disaggregation of the City. As noted earlier, the County parcel data divides the City into wards and annexes. These areas are loosely block-shaped and follow the City’s municipal boundary. The ACS

HOUSING STOCK BY CITY SECTION						Figure 5
HOUSING TYPE	E-W	NE	NW	SE + ANNEX	SW	CITY
HOUSING UNITS	3,872	4,827	2,783	4,470	7,044	22,996
HOUSEHOLDS	3,468	4,281	2,423	4,184	6,480	20,835
RATIO OF UNITS TO HOUSEHOLDS	1.1	1.1	1.2	1.1	1.1	1.1
NOTE: The housing unit estimates exclude some sections of the City to facilitate alignment with population estimates available at the Census tract level. This approach omits approximately 4-5% of the City’s population and housing units.						



divides the City into Census tracts. The Census tracts meander and do not follow municipal boundaries.

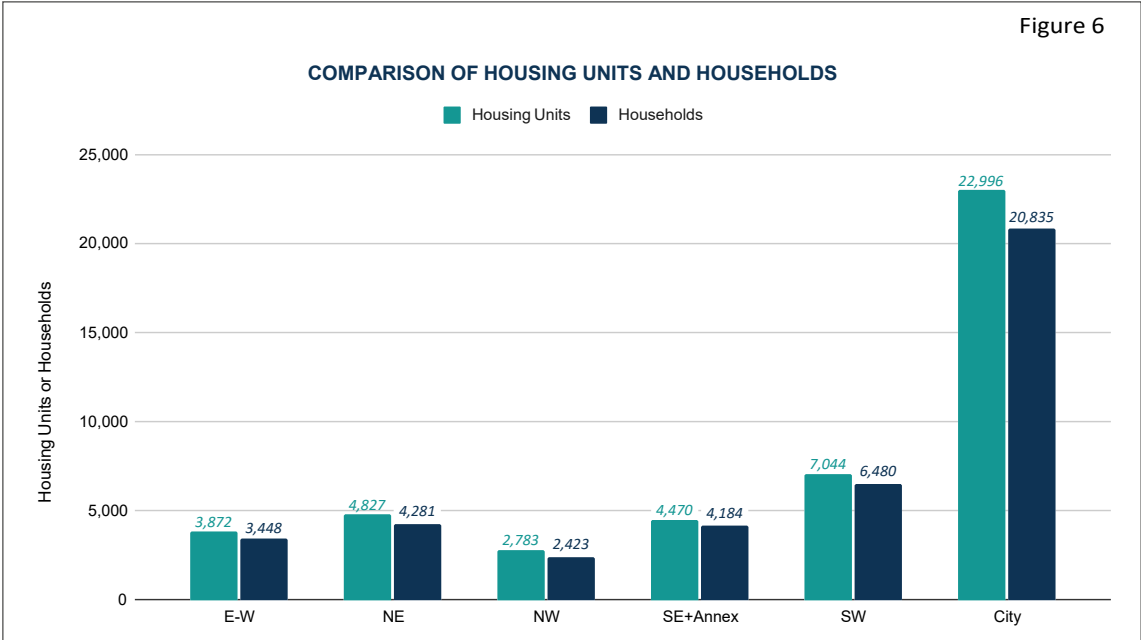
Because of the imperfect alignment between City sections and Census tracts, detailing housing for each City section is based on a sample. The 2019 ACS data estimates that the City's 59,300 residents were comprised of roughly 22,100 households. The parcel-level analysis of housing estimates that the City has around 24,300 housing units. The sample captures around 95% of each, focusing on the central parts of the City and generally excluding some Annex areas.

Based on this sample, the City's vacancy rate is 9%. This rate seems high at an aggregate level, but it translates to 1.1 housing units per household. In other words, for every 10 households, there is one vacant unit. This ratio does not give consideration to the type and size of housing, nor does it account for housing quality. The result is that the vacancy rate likely overstates the excess supply of housing in the City. Figure 5 and Figure 6 also highlight that vacancy rates vary across the City.

*Families are defined as households with two or more individuals that are married or related by birth, marriage or adoption.*

*Nonfamily households consist of one or more persons that are unrelated.*

Household composition varies across the City. The following sections detail how the City's housing stock aligns with household characteristics within each of the five analytic sections of the City. To evaluate where housing supply challenges may be most acute, the analysis makes assumptions about the minimum number of bedrooms required for households based on their composition. For example, individuals living alone are assumed to require an efficiency or a one-bedroom housing unit. Couples (married or co-habiting) and without children are assumed to require one or two bedroom units. Families with children under the age of 18 are assumed to need single family dwellings or three-bedroom housing units.



# East-West Corridor

The East-West Corridor has an estimated 3,870 housing units. Given the Main Street composition of this City section, the housing stock is largely comprised of apartments and multi-family dwellings (including condominiums).

Aligning with this type of housing, the household population in this part of the City is largely made up of people living alone (36% of households) or households without children (40%). Less than one-quarter of the households have children under the age of 18.

The vacancy rate in this section is 10%, with 3,500 of the 3,900 housing units occupied. However, Figure 7 illustrates that the excess supply is likely confined to single family dwellings, and Figure 8 details the housing stock.

## Rental Market

Just under 70% of the housing stock in this part of the City is in the rental market. Single family dwellings have the lowest share of units in the rental market (30%). While over 87% of all other housing types are in the rental market.

The ACS estimates 66% of the households rent (2,300 of 3,470 households). Median rent ranges from \$815 to \$845. Nearly 42% of renting households are housing cost burdened (ie, allocating at least 30% of household income to rent), and 29% pay at least \$1,000 per month in rent.

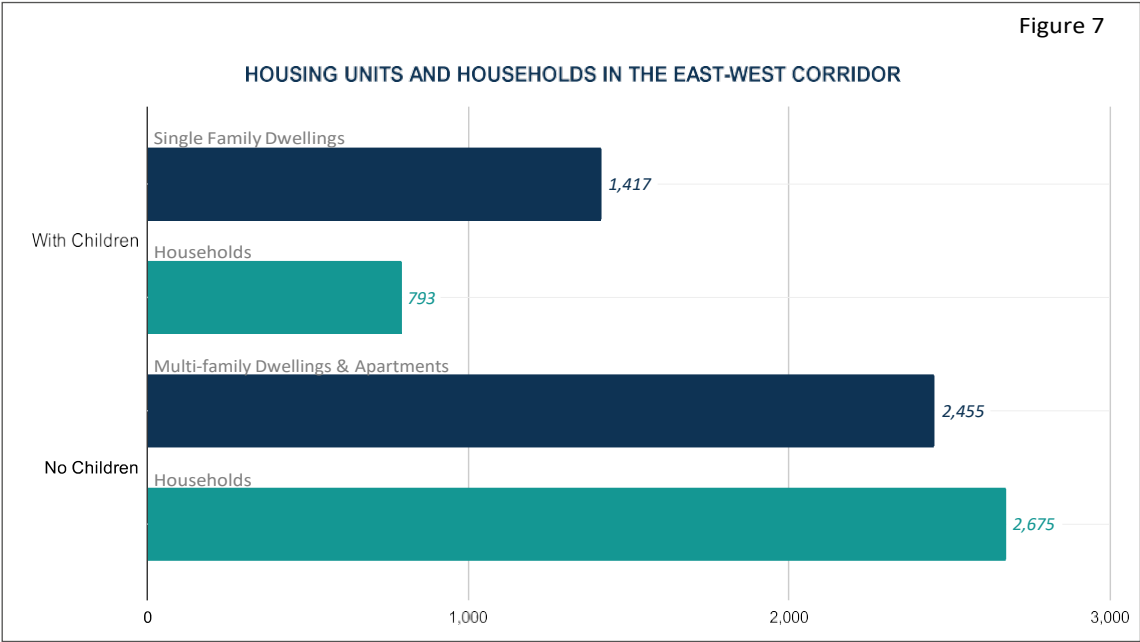


Figure 8

HOUSING STOCK AND VACANCIES IN EAST-WEST CORRIDOR					
	UNITS	HOUSEHOLDS W/ CHILDREN	HOUSEHOLDERS LIVING ALONE	HOUSEHOLDS W/ NO CHILDREN	RATIO HOUSING TO HOUSEHOLDS
SINGLE FAMILY	1,417	793			1.8
TWO-FAMILY	488				
THREE-FAMILY	279				
FOUR-FAMILY	114				
FIVE+ FAMILY	204				
CONDO	324				
APT + OTHER 500	1,046				
TOTAL	3,872		3,468		1.1
VACANCY RATE	10%				
VACANT UNITS	404				

## Northeast Quadrant

The Northeast Quadrant's housing stock is not well aligned with its resident population. It has an estimated 4,830 housing units. Over half of the housing units (56%) are single family dwellings, but only 27% of the households have children. Multi-family dwellings and apartments make up 44% of the housing units, while 73% of the households live alone or do not have children. Multi-family dwellings (which account for 24% of the housing stock) are slightly more prominent than apartments.

The vacancy rate in the Northeast Quadrant is 11%, with 550 of the housing units unoccupied. Figure 9 illustrates that the excess supply is likely confined to single family dwellings, and Figure 10 provides greater detail.

### Rental Market

The Northeast Quadrant has among the lowest share of housing in the rental market. Just under 60% of the housing stock is in the rental market. Single family dwellings have the lowest share of units in the rental market (32%). Over 90% of all other housing types are in the rental market.

The ACS estimates roughly half of the households rent (2,200 of 4,280 households). This section of the City has the widest range in rent. Median values range from \$790 to \$981. Just over 40% of renting households are housing cost burdened (ie, allocating at least 30% of household income to rent), and one-third pay at least \$1,000 per month in rent.

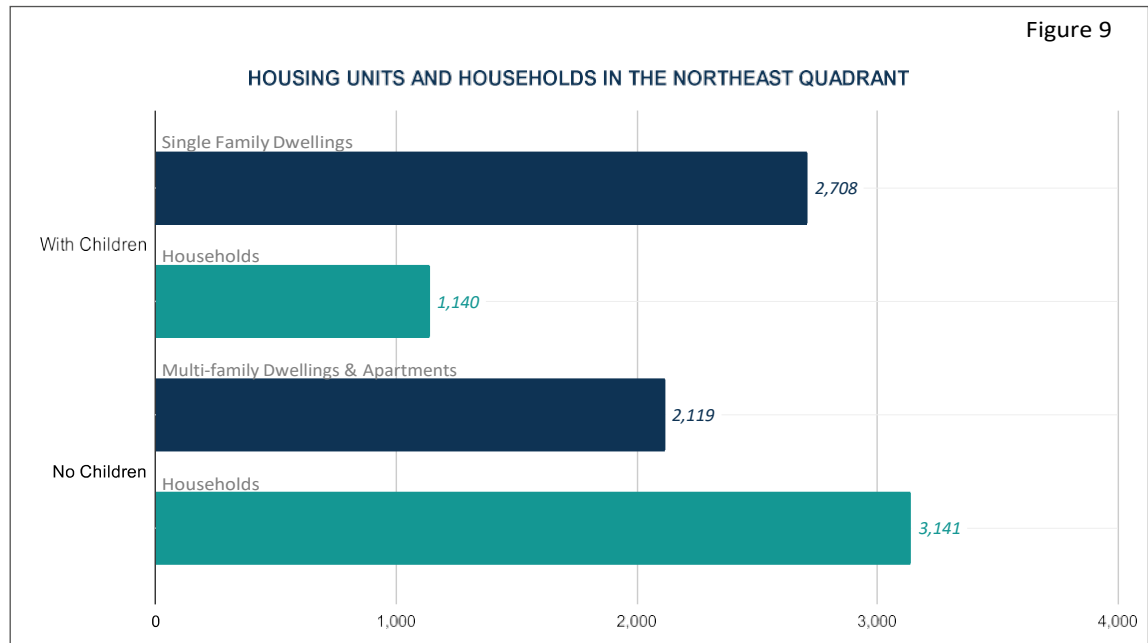


Figure 10

HOUSING STOCK AND VACANCIES IN NORTHEAST QUADRANT

	UNITS	HOUSEHOLDS W/ CHILDREN	HOUSEHOLDERS LIVING ALONE	HOUSEHOLDS W/ NO CHILDREN	RATIO HOUSING TO HOUSEHOLDS
SINGLE FAMILY	2,708	1,140			2.4
TWO-FAMILY	503				
THREE-FAMILY	282				
FOUR-FAMILY	153				
FIVE+ FAMILY	176		1,387	1,754	0.7
CONDO	63				
APT + OTHER 500	942				
<b>TOTAL</b>	<b>4,827</b>		<b>4,281</b>		<b>1.1</b>
<b>VACANCY RATE</b>	<b>11%</b>				
<b>VACANT UNITS</b>	<b>546</b>				

# Northwest Quadrant

The Northwest Quadrant of the City has an estimated 2,780 housing units. Single family dwellings comprise 42% of the housing stock (1,170). Multi-family dwellings and apartments make up the other 58%. In this area, it is estimated that there are twice the number of single family dwellings than there are households with children under the age of 18. Three-quarters of the households are a person living alone or people living together but without children.

The vacancy rate in the Northwest Quadrant is 13%, with 360 of the housing units unoccupied. Figure 11 illustrates that the excess supply is likely confined to single family dwellings, and Figure 12 provides greater detail.

## Rental Market

Two-thirds of the housing stock in the Northwest Quadrant is estimated to be in the rental market. Single family dwellings, like other sections of the City, have higher owner-occupied rates. An estimated 40% of the single family dwellings are in the rental market. Rental rates for all other housing types are generally in excess of 90%.

The ACS estimates 64% of households rent (1,540 of 2,420 households). Median rent in this section of the City has a range similar to the Northeast (\$790 to \$970). Over 40% of renting households are housing cost burdened (ie, allocating at least 30% of household income to rent), and 34% pay at least \$1,000 per month in rent.

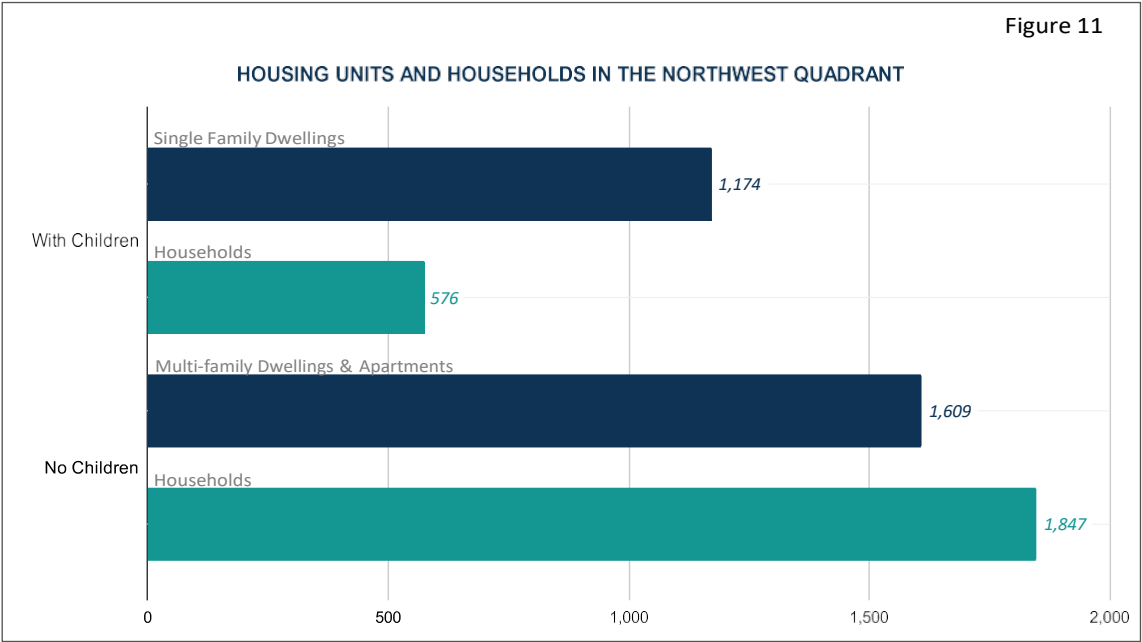


Figure 12

HOUSING STOCK AND VACANCIES IN NORTHWEST CORRIDOR

	UNITS	HOUSEHOLDS W/ CHILDREN	HOUSEHOLDERS LIVING ALONE	HOUSEHOLDS W/ NO CHILDREN	RATIO HOUSING TO HOUSEHOLDS
SINGLE FAMILY	1,174	576			2.0
TWO-FAMILY	354				
THREE-FAMILY	216				
FOUR-FAMILY	120				
FIVE+ FAMILY	63				
CONDO	69				
APT + OTHER 500	787				
TOTAL	2,783		2,423		1.1
VACANCY RATE	13%				
VACANT UNITS	360				

Southeast Quadrant and Selected Annexes

The Southeast Quadrant (combined with selected annexes) has an estimated 4,470 housing units. Single family dwellings comprise 52% of the housing stock (2,350). Multi-family dwellings and apartments make up the other portion. In this area, 40% of the households have children, with the other 60% comprised of persons living alone or without children under the age of 18.

The vacancy rate in the Southeast Quadrant, 6%, is the lowest across the City sections. This equates to an estimated 290 vacant housing units. Figure 13 illustrates that the excess supply is likely confined to single family dwellings, and Figure 14 provides greater detail.

Rental Market

The rental market is most significant in this section of the City. Just over two-thirds of the housing stock is estimated to be in the rental market, and 67% of the households rent (2,820 of 4,180 households).

In this section of the City, median rent ranges from \$715 to \$880. This range is lower than the other parts of the City. Reflecting the lower range of rent, only 21% of renting households pay more than \$1,000 per month. Despite lower rent, this part of the City has the highest share of households that are housing cost burdened. 56% of renting households allocate at least 30% of their income to housing.

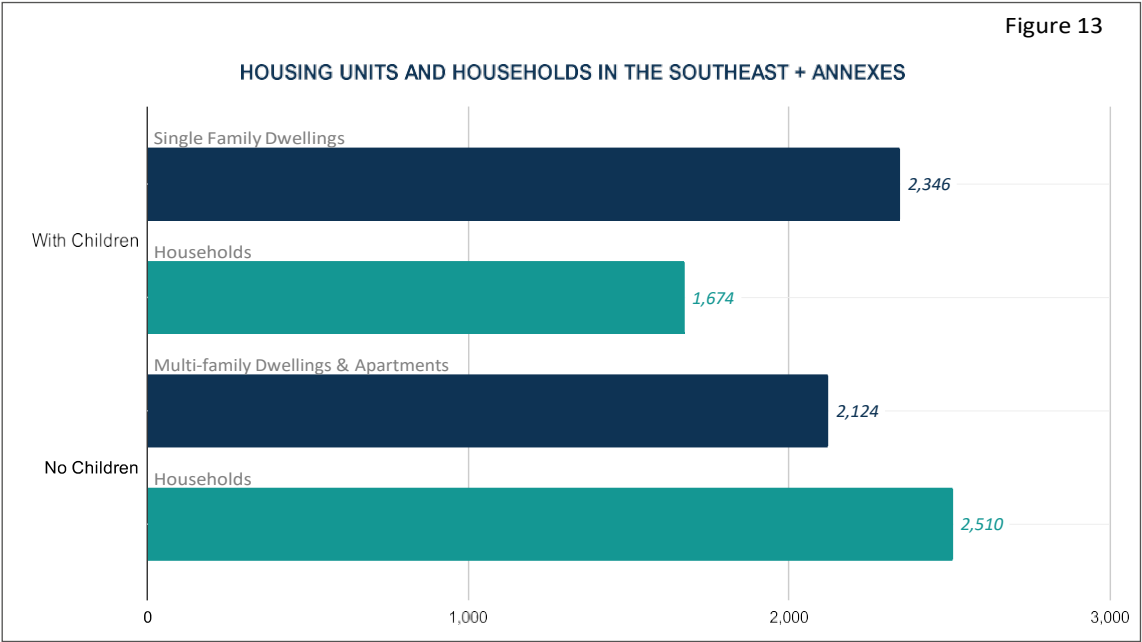


Figure 14

HOUSING STOCK AND VACANCIES IN SOUTHEAST + ANNEXES

	UNITS	HOUSEHOLDS W/ CHILDREN	HOUSEHOLDERS LIVING ALONE	HOUSEHOLDS W/ NO CHILDREN	RATIO HOUSING TO HOUSEHOLDS
SINGLE FAMILY	2,346	1,674			1.4
TWO-FAMILY	325				
THREE-FAMILY	131				
FOUR-FAMILY	53				
FIVE+ FAMILY	33		1,169	1,340	0.6
CONDO	4				
APT + OTHER 500	1,578				
TOTAL	4,470		4,184		1.1
VACANCY RATE	6%				
VACANT UNITS	286				

# Southwest Quadrant

The Southwest Quadrant of the City has an estimated 7,040 housing units. Across the City sections, the Southwest has the largest share of single family dwellings. They comprise 71% of the section’s housing stock (5,020). Multi-family dwellings and apartments make up less than 30% of the housing units. Despite the significant availability of single family dwellings, households without children or individuals living alone are the majority. 37% of households have no children. Another 27% of households have someone living alone. Only 36% of the households in the Southwest Quadrant have children.

Despite the differences in composition between the types of available housing and household composition, this part of the City has a relatively low vacancy rate (8%). Approximately 560 housing units are vacant. Figure 15 illustrates the differences in housing stock and household composition, and Figure 16 provides greater detail.

## Rental Market

Across the City sections, the Southwest Quadrant has the lowest portion of housing in the rental market. Approximately 3,840 of the 7,040 housing units (54%) are in the rental market. At the same time, it has a larger share of single-family dwellings in the rental market (40%).

The ACS estimates almost half of the households rent (3,220 of 6,480 households) in the Southwest Quadrant. Median rent in this section of the City ranges from \$735 to \$955, which is slightly higher than the Southeast Quadrant. Just under 50% of renting households are housing cost burdened (ie, allocating at least 30% of household income to rent), and 34% pay at least \$1000 per month in rent.

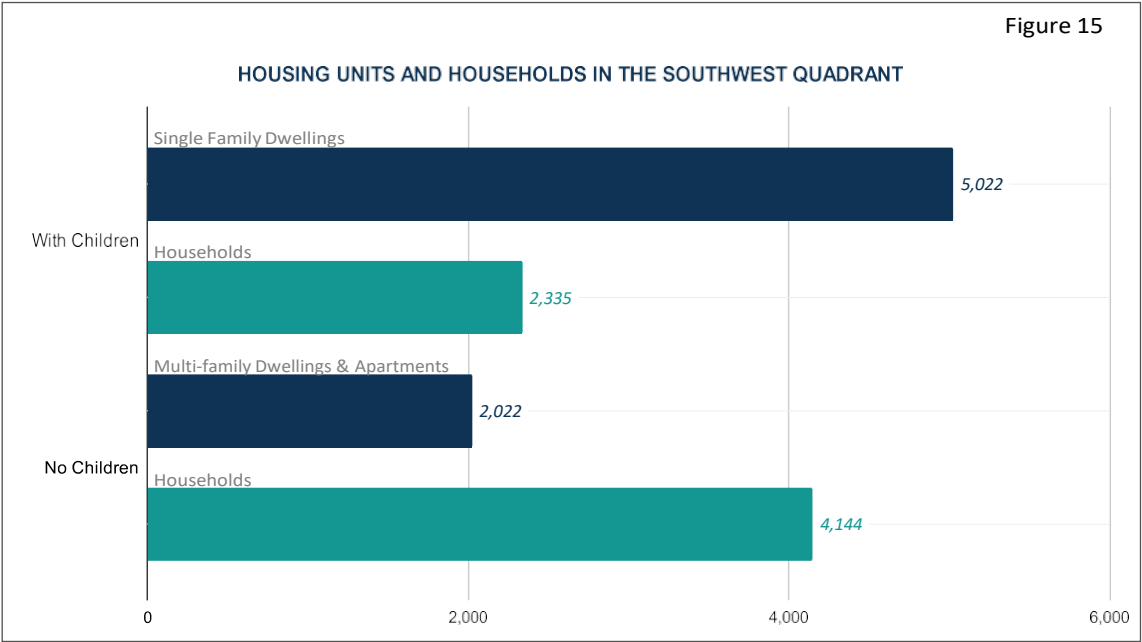


Figure 16

HOUSING STOCK AND VACANCIES IN SOUTHWEST QUADRANT					
	UNITS	HOUSEHOLDS W/ CHILDREN	HOUSEHOLDERS LIVING ALONE	HOUSEHOLDS W/ NO CHILDREN	RATIO HOUSING TO HOUSEHOLDS
SINGLE FAMILY	5,022	2,335			2.2
TWO-FAMILY	558		1,733	2,412	0.3
THREE-FAMILY	194				
FOUR-FAMILY	45				
FIVE+ FAMILY	52				
CONDO	0				
APT+ OTHER 500	1,173				
TOTAL	7,044	6,480			1.1
VACANCY RATE	8%				
VACANT UNITS	564				

Summary

The table summarizes key data points about housing cost burden across the City.

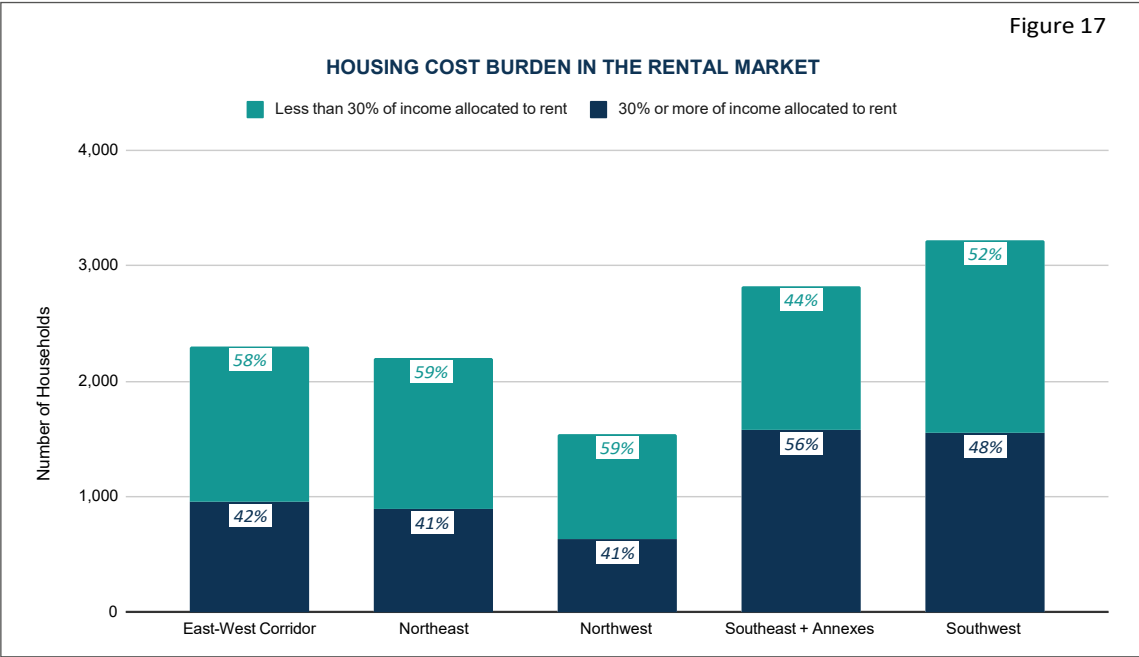


Figure 18

HOUSING COST BURDEN IN THE RENTAL MARKET (VALUES)

		EAST-WEST CORRIDOR	NORTHEAST	NORTHWEST	SOUTHEAST + ANNEXES	SOUTHWEST
RENTING HOUSEHOLDS	Number of Households	2,302	2,204	1,540	2,822	3,219
	Share of Total Households	66%	51%	64%	67%	50%
HOUSING COST BURDENED	Number of Households	956	900	633	1,576	1,552
	Share of Renting Households	42%	41%	41%	56%	48%
PAYING \$1,000+ IN RENT	Number of Households	669	719	520	607	1100
MEDIAN RENT	Rent Per Month	\$816 - \$845	\$790 - \$981	\$790 - \$973	\$715 - \$880	\$735 - \$954
MEDIAN HOUSEHOLD INCOME	Annual Income	\$28,300 - \$48,800	\$28,300 - \$61,600	\$39,300 - \$54,800	\$28,300 - \$45,800	\$28,300 - \$55,400
TOTAL HOUSEHOLDS		3,468	4,281	2,423	4,184	6,480

## DATA & KEY ASSUMPTIONS

### Data Sources

#### *Lancaster County Parcel database (2019)*

- *Property - Identify all parcels in the City & Annex (by Ward)*
  - *Land use code*
  - *Parcel address*
  - *Property class code*
- *Attribute*
  - *Attribute description (accommodation, apartment/units)*
  - *Number of families, bedrooms and/or units*
- *Occupancies*
  - *Occupancy description (multiple residential, apartment, dormitory, fraternity)*
  - *Number of units*

#### *Lancaster City Rental License database (January 2021)*

- *Parcels licensed for rent and number of units*

#### *US Census Bureau (2019)*

- *Household composition and location (by Census Tract)*
- *Number of housing units – rented v. own*

*\* Housing units are defined as parcels with residential occupancy on any land use category, such as single or multi-family dwellings, condos, apartments, multi-family residential, dormitory.*

### Rental Housing Units

- *Identify based on rental license database*
- *Assume all apartments & units in multi-use property (not condo) are rental.*
- *All multi-family dwellings at least one unit assumed owner-occupied and all others are rental.*

### Detailing City's Population

#### *US Census Bureau (2019) - Selected tables from the American Community Survey (2019)*

- *Median income in the past 12 months*
- *Selected social characteristics of households and families*
- *Selected housing characteristics, homeownership rate*
- *Households and families*

*\* Data is accessed at Census Tract and aggregated to construct "City Sections".*



**CENTER FOR REGIONAL ANALYSIS**  
**AT**  
**ECONOMIC DEVELOPMENT COMPANY**  
**OF LANCASTER COUNTY**

115 EAST KING STREET  
LANCASTER, PA 17602

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# INTERIM HOUSING STRATEGY

OCTOBER 2021



CITY OF  
LANCASTER

[CITYOFLANCASTERPA.COM/AFFORDABLE-HOUSING](http://CITYOFLANCASTERPA.COM/AFFORDABLE-HOUSING)

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## GUIDING FRAMEWORK

### I. Strategy Purpose

This housing strategy contains overarching quantitative policy targets, broad strategic goals, and key program tools for implementation of those goals over the next five (5) years. It is called an interim or working strategy because we view this effort as a foundation, which we will build upon and refine, especially during the Comprehensive Plan process, over the next one to two years. The strategy is not intended to be exhaustive, but rather shine a light on where we can and should focus our limited time, energy, and funds.

It is the intention of the City to increase the supply and diversity of housing in the city, with an emphasis on achieving

affordable homes for both rent and purchase. "Achieving" affordable homes can take the form of producing affordable housing units in new buildings or finding ways to protect or redevelop affordable housing units that are in structures that already exist.

Housing development, as a practice, takes a great deal of time, painstaking effort, and financial capital, as well as effective coordination and collaboration with a variety of stakeholders. Therefore, we must plan and align our resources for maximum impact.

### II. Market Context

Based on several indicators such as vacancy rates, housing price increases, and citizen input, we know the city needs more housing, serving a range of household types, income levels, and occupancy styles.

Preliminary analysis shows that housing cost burden is widespread across the income profile of residents (note: housing cost burden is defined as spending more than 30 percent of a household's gross income on housing). This situation of housing cost burden is being driven by a shortage in housing supply and generally low incomes in the City of Lancaster. Further, we have learned that the City's housing

stock does not align with the current household composition of the city, meaning that most homes are single-family, multi-bedroom dwellings, while the majority of households are composed of one or two people.

Effective housing development also relies upon strong neighborhood design, including access to transportation, goods and services, employment, recreational amenities, and attractive public spaces. Mixed-income and mixed-use development have been identified as international best practice in promoting equitable and cohesive growth.

### III. Equity Lens

We believe in affirmatively furthering fair housing and acknowledging the history of structural racism that has impacted where people live and what resources they have. This means, in part, addressing housing quality and choice throughout all areas of the city – with an emphasis on creating more housing options for disenfranchised populations, which disproportionately make up our low- and moderate-income households.

It means creating more pathways to homeownership in the southern quadrants of the city for existing residents and subsidizing additional affordable rental units (at different

price points) in the northern quadrants of the city. It means striving for consistency in housing condition and quality across all quadrants.

Finally, it means an amplified focus on increasing household incomes. While that is not an explicit component of *this* housing strategy, it does factor in new, specific ways in the City's Strategic Plan for 2022–2025.

There is no silver bullet for solving housing challenges here in Lancaster, as we face what is a national crisis at the local level. As such, we need an integrated and iterative approach.

## Guiding Framework (Continued)

### IV. Evidence-Based Decision Making

Housing is a serious public policy topic, which brings forth a range of ideas, opinions, and emotions. The City is dedicated to better understanding the existing conditions and trends through research and analysis and making decisions based on that data.

The City has commissioned an initial study of affordable housing through the Center for Regional Analysis and will be conducting additional analyses through the Comprehensive Plan and beyond, initiating a cycle of more

informed policies in the future. Periodic resources such as the American Community Survey and American Housing Survey will also be used to help provide a clearer, sustained picture of the housing situation in the City over time.

Further, the City will track metrics every year to evaluate how much progress is being made against our housing targets and what program tools are working well and which are not.

### V. Partnerships

The City cannot tackle housing challenges alone. We work with a network of organizations and agencies to implement projects and programs. Our partners include governmental agencies and authorities, community and nonprofit housing development organizations, housing assistance and counseling organizations, neighborhood leaders and associations, private developers and property owners, and others.

We believe in building off a strong track record of communication and collaboration with and between these partners, in an effort to further coordinate impact, reduce competition for resources, and expand our community's capacity. Ultimately, it is our partners that actually build

and renovate housing – so the City must ensure assets and funding are going to those partners with clear direction and parameters for development.

It is important to note in closing that attaining successful housing solutions for persons experiencing homelessness is an especially complex part of this puzzle and deserves its own dedicated strategy. Coordination of homeless service provision occurs primarily through the LancCo MyHome Coalition and County government. The City encourages a cohesive analysis and plan and wishes to be part of the team to determine and implement appropriate actions.

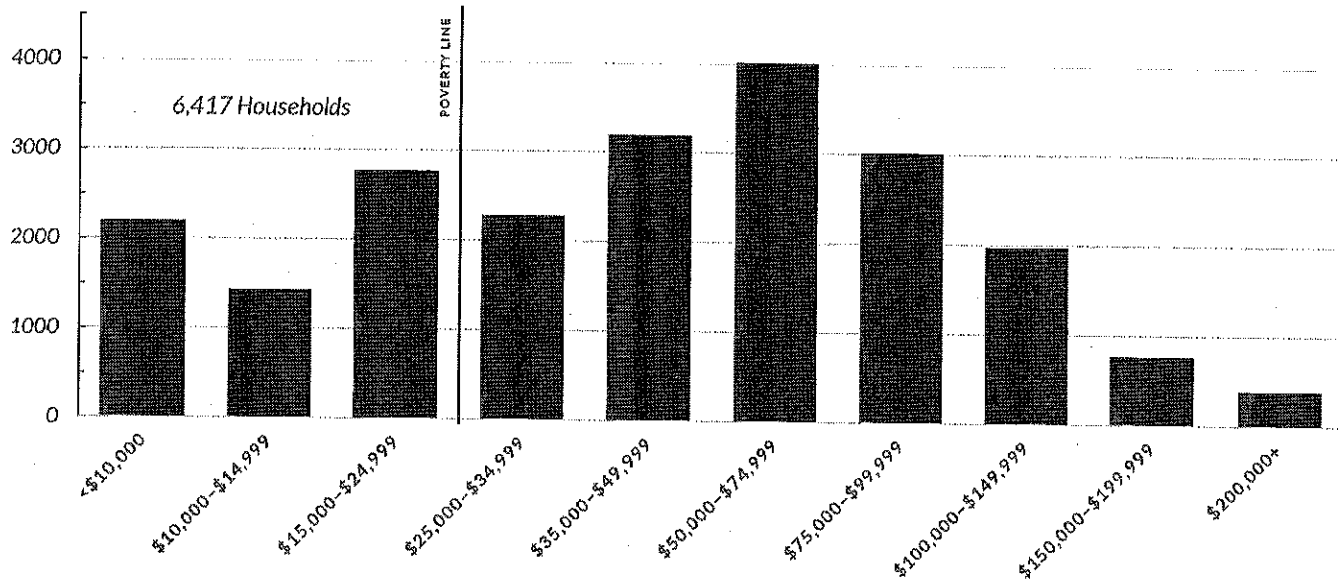
## QUANTITATIVE POLICY TARGETS

As determined in *Housing Availability in the City of Lancaster and Implications for Housing Affordability* by the Center for Regional Analysis, we know the City of Lancaster has a housing shortage estimated between 1,165–2,455 units across rental and homeownership markets. Based on this finding, and on known market conditions, the city will aim to meet the following, overarching targets by 2026:

1. The City will facilitate the creation of 2,000 new housing units, with the goal of at least 15 percent affordable.
2. The City will protect and improve 1,000 existing low- to moderate-income homes.
3. The City will evaluate and address every rental housing unit in the City, with the goal that at least 85 percent are rated fair or good condition.

\*Affordable housing units are defined as below 80 percent of the Area Median Income (AMI), according to U.S. Department of Housing and Urban Development calculations for the Metropolitan Statistical Area, which comprises the County as a whole. As a rule of thumb, City AMI is a little more than 60 percent of the County AMI.

## Distribution of Household Income in Lancaster City (2019)



### STRATEGIC GOALS & PROGRAM TOOLS FOR IMPLEMENTATION

- Goal 1 **PRODUCE** approximately 2000 new units, 300 of which are affordable
- Goal 2 **PROTECT** approximately 14,000 existing units, and improve 1,000+ units
- Goal 3 **ACQUIRE** approximately 200 units for affordability-focused redevelopment
- Goal 4 **INNOVATE** to create approximately 100 new units
- Goal 5 **SUSTAIN** existing affordability and neighborhood vitality

#### GOAL 1 **PRODUCE** [~2000 total units / 300 affordable]

Produce housing units in new construction to meet demand and expand the number of available homes, both affordable and market-rate.

- A. Comprehensive Plan / Land Development / Zoning: Create land use rules that promote housing supply while balancing good design. Put more units in the right places, create more of the right-sized units, and focus on livability and walkability. Because land development opportunities are limited, increasing housing supply depends upon repurposing and rehabilitating buildings, building up in height, and boosting density.
- B. Investment Capital: Create an urban environment that establishes a place where people want to live, work, and play and attracts investment capital to develop housing and mixed-use projects. Leverage financial tools like Local Economic Revitalization Tax Assistance (LERTA) and the City Revitalization and Improvement Zone (CRIZ) to help activate land development.
- C. Subsidy for Affordable Units: Realizing 15 percent of new units as affordable will require significant grant subsidy and/or low-cost financing. Use a combination of public and private funding sources to make affordable units within new land development economically feasible. Sources may include federal and state monies such as HOME, CDBG, NAP, PHARE, and ARPA monies, plus philanthropic or civic-oriented contributions.

## Strategic Goals & Program Tools for Implementation (Continued)

### GOAL 2 PROTECT [*~14,000 units evaluated / 1,000+ improved*]

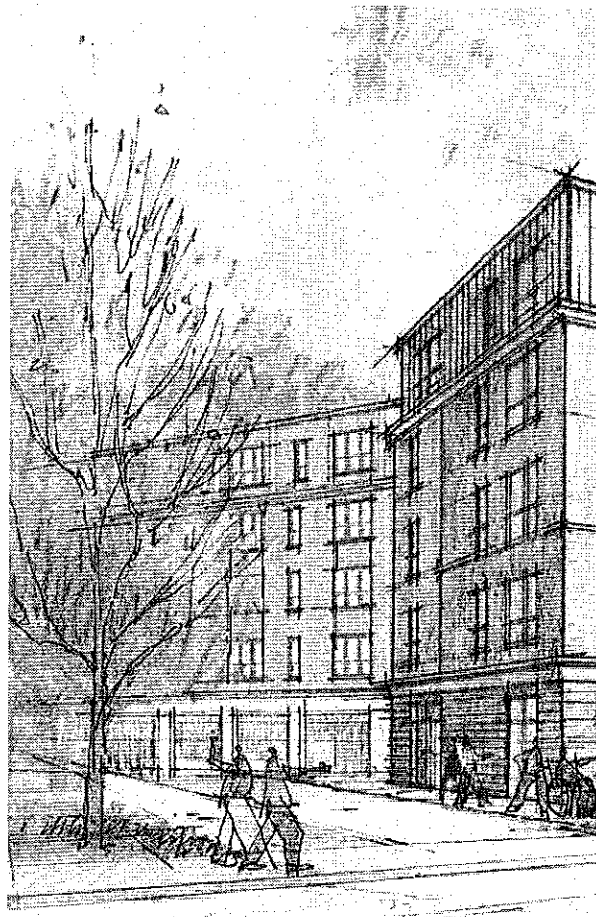
Protect, maintain, and improve the quality of existing housing to help keep households safe and affordable.

- A. Housing Inspections and Maintenance: Proactively protect properties and structures through systematic and complaint-based inspections and property maintenance actions. Hold all landlords accountable for providing safe and good-quality housing to their tenants. Update the City's Rental Property and Lead ordinances to focus resources and increase the number of inspections and incentivize rental housing upgrades where they are needed most. Boost landlord education efforts to foster a culture of commitment and compliance with City standards.
- B. Lead Remediation & Healthy Home Grants: Utilize the City and LGH lead programs to make as many homes lead safe as possible throughout the City, with a focus on the most under-served and vulnerable neighborhoods. Focus U.S. Department of Housing and Urban Development (HUD) funds on targeted Census tracts and LGH funds on other locations such as daycare facilities, Lancaster City Housing Authority properties, and low- to moderate income households in other tracts / quadrants.
- C. Critical Repair Grants and Loans: Provide financial support to low- and moderate- income homeowners to address costly repairs that can put families in jeopardy of harm or financial hardship when they face necessary fixes such as roofs, furnaces, utility lines, and home accessibility. Adapt the program to offer grants to households (versus loans) at or below 50 percent AMI.

### GOAL 3 ACQUIRE [*~200 units*]

Acquire properties and redevelop for the express purpose of neighborhood revitalization and affordability.

- A. Redevelopment Authority of the City of Lancaster (RACL): Partner with RACL to acquire blighted properties through the Property Reinvestment process. Move those properties into the hands of new owners who will redevelop for housing purposes. Rehabilitated RACL properties must be sold to families under 80% AMI who will occupy the home or rented to households below 60% AMI.
- B. Land Bank: Partner with the City's Land Bank to strategically purchase properties that can satisfy housing needs in the City. Offer those properties for sale first to Community Housing Development Organizations (CHDO), per established agreement. Coordinate a shared approach with the CHDOs to acquire for redevelopment.
- C. City-Led Conversion: The City will identify and oversee the purchase of select properties for affordable housing development and move those properties to housing developers, with deed restrictions or covenants that designate those properties for affordable or mixed-income redevelopment.
- D. Transitional Facility: In concert with the County and LancCo MyHome, identify and develop a permanent facility or facilities to provide transitional living housing and wrap-around services to meet the needs of those individuals moving from homelessness to a stable living situation, including an additional 40 units in the City.





## Strategic Goals & Program Tools for Implementation (Continued)

### GOAL 4 INNOVATE [~100 units]

Innovate by exploring emerging housing design types, which may facilitate lower-cost housing units.

Possibilities may include:

- A. Home Sharing and Community Living Models: Evaluate and where appropriate enable more flexible shared living arrangements, which may lend themselves, especially, to younger or older households who tend to have lower or fixed incomes.
- B. Accessory Dwelling Units: Ensure zoning and building codes encourage accessory dwelling units where feasible. Explore opportunities for community housing development organizations to build out ADUs and create wealth for low- to moderate- income households.
- C. Tiny Homes: Analyze square footage requirements and other rules to determine where smaller units may provide more options and meet specific demand in the market. Revise ordinances as needed.
- D. Reduced Parking Requirements: Implement reduced parking minimums in targeted areas, such as Downtown, on commercial corridors with bus transit service, and around the train station.

*Below: Planned new construction affordable housing at 213 College Avenue made possible by a combination of grant subsidy and low-cost financing.*



### GOAL 5 SUSTAIN [# of households/persons served; \$ dispersed]

Sustain and foster housing stability and neighborhood vitality.

- A. Safety Nets: Provide financial supports to prevent housing loss through programs such as Emergency Rental Assistance and Utility Assistance. Cover gap expenses for missed rent or utility payments to prevent residents from being evicted; couple with related capacity supports, such as case management, financial counseling, and/or job navigation as possible. Maintain the financial health of landlords to avoid hardship and property deterioration through the Emergency Assistance programming.
- B. Home Ownership Protections: Expand and explore programs to help low-income homeowners stay in their homes as they age and build equity, such as Low-Interest Home Loans and Façade Improvement Grants.
- C. Pathways to Home Ownership: Expand and explore pathways to help low-income residents purchase a home and build wealth, such as Down Payment Assistance, Live Near Your Work Grants and the Tenants Opportunity to Purchase Act (TOPA).
- D. Homeless Shelter: Contribute resources and support to help establish appropriate planning, funding levels, and program management with the County and LancCo MyHome to ensure at least 100 quality, emergency shelter beds in the City, including 20-30 new shelter beds.



GOAL	PROGRAM TOOL	IMPLEMENTERS	METRIC	TARGET
PRODUCE	Comp Plan/Land Development	City of Lancaster LCA Land/Housing Developers Anchor Institutions	# of Housing Units % Affordable	2,000 15%
	Investment Capital	Land/Housing Developers Property Owners Banks/CDFIs/LCA	Private \$ Invested	\$1B
	Subsidy for Affordable Units	City of Lancaster Land/Housing Developers Foundations/CDFIs	# of Affordable Units	300
PROTECT	Housing Inspections and Maintenance	Property Owners City of Lancaster	# of Units Evaluated # of Units Improved Condition (Fair/Good)	14,000 1,000 (85%)
	Lead Remediation and Healthy Homes	City of Lancaster Penn Medicine Lanc. General Health	# of Units	700 460
	Critical Repair	City of Lancaster NSPs	# of Units	200
ACQUIRE	Redevelopment Authority of City of Lancaster (RACL)	Redevelopers Rehab Agents	# of Units	40
	Land Bank	CHDOs	# of Units	30
	City-Led Conversion	Land/Housing Developers City of Lancaster	# of Units	90
	Transitional Facility	LCMH NSPs City of Lancaster	# of Units / Beds	40
INNOVATE	Shared Living Models	Land/Housing Developers City of Lancaster	# of Units	60
	Accessory Dwelling Units	Property Owners CHDOs Foundations/Philanthropists	# of Units	20
	Tiny Homes	Land/Housing Developers City of Lancaster	# of Units	20
	Reduced Parking Requirements	City of Lancaster	Parking Ratios	N/A
SUSTAIN	Safety Net Assistance	Lancaster County NSPs/LEAs	# of Households Served \$ Dispersed	TBD
	Homeowner Protections	NSPs/LEAs/LCA City of Lancaster	# of Households Served \$ Dispersed	250 TBD
	Pathways to Homeownership	NSPs/LEAs City of Lancaster	# of Households Served \$ Dispersed	200 TBD
	Homeless Shelter	LCMH/NSPs City of Lancaster	Total Beds New Beds	100 30

#### ACRONYMS

CDFIs Community Development Financial Institutions  
CHDOs Community Housing Development Organizations  
LCA Lancaster City Alliance

LEAs Lancaster Equity Agencies  
LCMH Lanc Co MyHome  
NSPs Nonprofit Service Partners

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## AFFORDABLE HOUSING IN THE CITY OF LANCASTER

The City of Lancaster is committed to using all of the tools we have to create as many affordable housing units as possible. The availability of affordable housing is a key issue for our city residents and neighbors in Lancaster County. The City is making budgetary and programmatic commitments to increase affordable housing units within the City. While the City has made this commitment, the City's tools alone cannot solve this issue. Local governments like Lancaster City are funded through taxes, so the City depends on County, State and Federal funds to support this effort to avoid placing additional tax burden on City residents.

The Sorace Administration continues to advocate for increased federal and state funds toward creating affordable housing units in Lancaster City and County. Join us in this advocacy at [cityoflanasterpa.com/take-action](http://cityoflanasterpa.com/take-action).

## LEARN MORE ABOUT AFFORDABLE HOUSING IN THE CITY OF LANCASTER

[CityOfLancasterPA.com/affordable-housing](http://CityOfLancasterPA.com/affordable-housing)

DEPARTMENT OF COMMUNITY PLANING &  
ECONOMIC DEVELOPMENT  
120 North Duke Street • P.O. Box 1599  
Lancaster, PA 17608

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## **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).

## **Is Your Business a Section 3 Business?**

### Section 3 Resident:

1. A resident of public housing, or who is on public assistance.
2. A Low Income Person who resides in the neighborhood or project area in which the HUD Section 3 covered assistance is expended. A low income person is defined as a member of a family (including single persons) whose income does not exceed 80% of the median income for Lancaster County. (See Attachment A)
3. A Very Low Income Person who resides in the neighborhood or project area in which the Section 3 covered assistance is expended. A very low income person is defined as a member of a family (including single persons) whose income does not exceed 50% of the median income for Lancaster County. (See Attachment A)

### Section 3 Business:

1. A business that is 51% or more owned by Section 3 residents; or
2. A business where at least 30% of the permanent, full time staff are Section 3 residents, or who within three years of their employment date were Section 3 residents; or
3. A business that provides evidence of a commitment to subcontract in excess of 25% of all awarded contracts to Section 3 business concerns that meet either 1 or 2 above.

ATTACHMENT “A”  
Lancaster, PA MSA  
Income Limits – 2021

**Median Family Income - \$83,000**

<b>Number of Persons in Family</b>	<b>Extremely Low Income Limits (\$)*</b>	<b>Very Low (50%) Income Limits (\$)</b>	<b>Low (80%) Income Limits (\$)</b>
1	\$17,450	\$29,050	\$46,500
2	\$19,950	\$33,200	\$53,150
3	\$22,450	\$37,350	\$59,800
<b>4</b>	<b>\$26,500</b>	<b>\$41,500</b>	<b>\$66,400</b>
5	\$31,040	\$44,850	\$71,750
6	\$35,580	\$48,150	\$77,050
7	\$40,120	\$51,500	\$82,350
8	\$44,660	\$54,800	\$87,650

**NOTE:** Lancaster County is part of the **Lancaster, PA MSA**, so all information presented here applies to all of the **Lancaster, PA MSA**.

The **Lancaster, PA MSA** contains the following areas: Lancaster County, PA

\* The FY 2014 Consolidated Appropriations Act changed the definition of extremely low-income to be the greater of 30/50ths (60 percent) of the Section 8 very low-income limit or the poverty guideline as [established by the Department of Health and Human Services \(HHS\)](#), provided that this amount is not greater than the Section 8 50% very low-income limit. Consequently, the extremely low-income limits may equal the very low (50%) income limits. Income Limit areas are based on FY 2019 Fair Market Rent (FMR) areas. For information on FMRs, please see our associated FY 2019 [Fair Market Rent documentation system](#).

Page 1 of 1  
ATTACHMENT "B"  
CERTIFICATION OF COMMITMENT  
SECTION 3 AFFIRMATIVE ACTION  
CITY OF LANCASTER

NOTE: Attachment "B" is to be submitted with all project bids. Bids that do not include this attachment will be rejected as non-responsive.


This certification is freely given by the undersigned as a demonstration of compliance with the requirement that a commitment be made by contractors and their subcontractors on federally assisted HUD housing and community development assistance (including Section 8, housing rehabilitation, housing construction, and other public construction) to which Section 3 of the Housing and Urban Development Act of 1968 applies to ensure that employment and other economic opportunities generated by or on this project shall, to the greatest extent feasible, be directed to low and very low income persons, particularly person who are recipients of HUD assistance for housing.

The specific commitment engendered by this certification is that (to the greatest extent feasible the undersigned) will

1. employ Section 3 Residents as a percentage of the aggregate number of new hires for each year of the duration of this project; the minimum numerical goal for Section 3 new hires is 30%, and
2. make awards of contracts or subcontracts to Section 3 Business Concerns as detailed under Numerical Goals of this Section 3 Plan; the minimum numerical goal for Section 3 construction opportunities is 10%.

It is understood that the undersigned gives this certification as an inducement for acknowledgement that the undersigned will comply with Section 3 and is therefore responsive in this regard to the project bid specification of which this Attachment is made part. Noncompliance with Section 3 regulations may result in sanctions, termination for default of the contract that this certification is made part, debarment or suspension from future HUD assisted contracts and initiation of action under federal or state laws concerning false statements.

The undersigned swears that the foregoing statements are true and correct. Further, the undersigned agrees to provide current, complete, and accurate information regarding actual employment and/or training provided to Section 3 Residents and contract or subcontracts awards made to Section 3 Business Concerns and to permit the audit and examination of books, records, and files of the undersigned regarding such Residents and Concerns.

Signature:  Title: Construction Manager  
Company Name: Doug Lamb Construction, Inc. Date: 08/18/2021

### SECTION 3 ACTION PLAN DOCUMENTATION

Project Title: Howard Avenue Street Revitalization Project

This form is to be used for documentation of actual numerical goals achieved by the General Contractor and all Subcontractors, and for documentation of their actions taken and impediments they encountered while attempting to reach the minimum numerical goals contained in this Section 3 Affirmative Action Plan.

1. List all tiers of subcontractors and indicate which are Section 3 Business Concerns:

Name of Firm	Section 3 Business Concern? Yes or No	Dollar Amount of all Subcontracts Awarded
NESL	No	\$106,639.00
Rota Mill	Yes	\$30,047.00
DE Gemmill	No	\$7,400.00

Total Amount of Subcontracts Awarded: \$144,086.00

2. List of actual new hires for your firm and all tiers of subcontracts:

Name of New Hire	Section 3 Resident? Yes/No
None	

Total of All Hires: 0

3. If the Section 3 minimum numerical target goals are not achieved for either subcontracting or new hires; your firm and any of your subcontractors with contracts exceeding \$100,000.00 must provide (1) documentation for the actions taken by your firm to meet the Section 3 goals, and (2) documentation of any impediments encountered by your firm to meet the Section 3 goals. Contractors and their subcontractors are required by federal regulation to make the maximum feasible effort in taking actions to award contracts to Section 3 Business Concerns and to hire Section 3 Residents when they are needed. Please attach copies of appropriate correspondence, media advertisements, etc. for every action taken or impediment encountered. This documentation will be used to judge your compliance in meeting the intent of the Section 3 regulations.

**NOTE:**  
**ALL THREE (3) PAGES OF THIS FORM MUST**  
**ACCOMPANY YOUR BID.**

## ATTACHMENT "C"

### VERIFICATION OF SECTION 3 RESIDENCY

NOTE: This form is to be used to verify that an employee is a resident of the service area or neighborhood designation for this Section 3 covered project.

I, (print name) N/A  
declare that I am a new hire ( ); or a current employee ( ) of this company.

The undersigned swears that the foregoing statements are true and correct and understands false statements may initiate action under Federal or State laws concerning false statements.

Signature: \_\_\_\_\_

Date Signed: \_\_\_\_\_

Address: \_\_\_\_\_  
Street Number      Street      City      State      Zip Code



ATTACHMENT "D"  
SECTION 3 BUSINESS CONCERN CERTIFICATION

CITY OF LANCASTER

Project Title: Howard Avenue Street Revitalization Project

The undersigned acknowledges by this certification its understanding that the aforementioned project is subject to the County of Lancaster's Section 3 Action Plan which warrants that work generated by certain United States Department of Housing and Urban Development (HUD) financial assistance shall, to the greatest extent feasible, and consistent with existing Federal, State and local laws and regulations, be directed to business concerns which provide economic opportunities to low and very low income persons.

In reliance of that said warranty and with intent to claim the preference to be given business concerns providing economic opportunities to low and very low income persons (that is, to be given to Section 3 Business Concerns), it is hereby certified that the firm named herein below is a Section 3 Business Concern by virtue of meeting the criteria defined in this Section 3 Action Plan.

The undersigned swears that this certification is true and correct and understands that false statements may initiate action under Federal or State laws concerning false statements.

Name of Firm: Doug Lamb Construction, Inc.

Address: 1180 Zeager Road Elizabethtown, Pa 17022

Signature: 

Title: Construction Manager

Date Signed: 08/18/2021

**ATTACHMENT “E”**  
**ECONOMIC OPPORTUNITIES FOR LOW AND VERY LOW**  
**INCOME PERSONS IN CONNECTION WITH ASSISTED**  
**SECTION 3 PROJECTS**

Project Title:

Contractor Name and Address:

Federal I.D. Number:	Dollar Amount of Contract:
Contact Person:	Reporting Period:
Phone Number:	Date Report Submitted:

Part I: Employment and Training (\*include New Hires in columns C and D) Show Numbers for Columns D and E.

A Job category	B Number of New Hires	C Number of New Hires that are Section 3 Residents	D % of Section 3 New Hires	E % of Total Staff Hours for Section 3 Employees	F Number of Section 3 Trainees
Administration					
Carpentry					
Case Management					
Clerical					
Electrical					
Facilities/Maintenance					
Masonry					
Plumbing					
Professional Technical (Bookkeeping, IT, etc.)					
Other (List)					
Total					

Instruction for completion of Part I: Employment and Training Opportunities – cumulative to date reporting required.

Block A: Contains various job categories. Professionals are defined as people who have special knowledge of an occupation (i.e., supervisors, architects, surveyors, planners, and computer programmers). For construction positions, list each trade and provide data in columns B through E for each trade where persons were employed. The category of “Other” includes occupations such as service workers.

Block B: Enter the percentage of all new hires (Section 3 Residents) in connection with this project contract award. New hairs include full time positions (permanent, temporary, and seasonal).

Block C: Enter the percentage of the total staff hours worked for Section 3 employees and trainees (including new hires) connected with this project contract award. Include staff hours for part time and full time positions.

Block D: Enter the number of Section 3 Residents that were hired and trained in connection with the project contract award.

Block E: Enter the percentage of Total Staff Hours for Section 3 Employees

Block F: Enter the number of Section 3 Trainees

## Part II: Contracts Awarded Cumulative to Date

### 1. Construction Contracts:

- A. Total amount of all contracts over \$100,000.00 awarded on this project: \$ \$144,086.00
- B. Total dollar amount of contracts awarded to Section 3 Businesses: \$ \$30,047.00
- C. Percentage of the total dollar amount that was awarded to Section 3 Businesses 21 %
- D. Total Number of Section 3 Businesses receiving contracts: 1

Part III: Summary – Cumulative to Date:

Indicate the efforts made to direct the employment and other economic opportunities generated by HUD financial assistance for housing and community development programs, to the greatest extent feasible, toward low and very low income persons, particularly those recipients of government assistance for housing. Check all that apply.

☐ Attempted to recruit low income residents through local advertising media, signs prominently displayed at the project site, contacts with community organizations and public or private agencies operating within the metropolitan area or non-metropolitan county in which this Section 3 covered project is located, or similar methods.

☐ Participated in a HUD program or other program which promotes the training or employment of Section 3 Residents.

☐ Participated in a HUD program or other program which promotes the award of contracts to business concerns which meet the definition of Section 3 Business concerns.

☐ Coordinated with the Youthbuild Programs administered in the metropolitan area in which this Section 3 covered project is located.

☐ Other, describe on additional attached pages.

**NOTE:**

**SUBMISSION OF THIS ATTACHEMENT IS REQUIRED AT THE END OF THE PROJECT. FINAL PAYMENT WILL NOT BE RELEASED TO THE CONTRACTOR BY THE CITY UNTIL A PROPERLY COMPLETED FORM IS RECEIVED.**

Public Reporting Burden for this collection of information is estimated to average .50 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This information is voluntary. HUD may not collect this information, and you are not required to complete this form, unless it displays a currently valid OMB Control Number.

Executive Order 12421 dated July 14, 1983, directs the Minority Business Development Plans shall be developed by each Federal Agency and that these annual plans shall establish minority business development objectives. The information is used by HUD to monitor and evaluate MBE activities against the total program activity and the designated minority business enterprise (MBE) goals. The Department requires the information to provide guidance and oversight for programs for the development of minority business enterprise concerning Minority Business Development. If the information is not collected HUD would not be able to establish meaningful MBE goals nor evaluate MBE performance against these goals. While no assurances of confidentiality is pledged to respondents, HUD generally discloses this data only in response to a Freedom of Information request.

**Privacy Act Notice** - The United States Department of Housing and Urban Development, Federal Housing Administration, is authorized to solicit the information requested in this form by virtue of Title 12, United States Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. It will not be disclosed or released outside the United States Department of Housing and Urban Development without your consent, except as required or permitted by law.

1. Grantee/Project Owner/Developer/Sponsor/Builder/Agency

Check if:  
PHA ☐  
IHA ☐

2. Location (City, State, ZIP Code)

3a. Name of Contact Person

3b. Phone Number (Including Area Code)

4. Reporting Period  
☐ Oct. 1 - Sept. 30 (Annual-FY)

5. Program Code (Not applicable for CPD programs.)  
See explanation of codes at bottom of page.  
Use a separate sheet for each program code.

6. Date Submitted to Field Office

Grant/Project Number or HUD Case Number or other identification of property, subdivision, dwelling unit, etc.  7a.	Amount of Contract or Subcontract  7b.	Type of Trade Code (See below) 7c.	Contractor or Subcontractor Business Racial/Ethnic Code (See below) 7d.	Woman Owned Business (Yes or No) 7e.	Prime Contractor Identification (ID) Number 7f.	Sec. 3 7g.	Subcontractor Identification (ID) Number 7h.	Sec. 3 7i.	Contractor/Subcontractor Name and Address 7j.				
									Name	Street	City	State	Zip Code

**CPD:**  
1 = New Construction  
2 = Education/Training  
3 = Other

**7c: Type of Trade Codes:**  
**Housing/Public Housing:**  
1 = New Construction  
2 = Substantial Rehab.  
3 = Repair  
4 = Service  
5 = Project Mangt.

6 = Professional  
7 = Tenant Services  
8 = Education/Training  
9 = Arch./Engrg. Appraisal  
0 = Other

**7d: Racial/Ethnic Codes:**  
1 = White Americans  
2 = Black Americans  
3 = Native Americans  
4 = Hispanic Americans  
5 = Asian/Pacific Americans  
6 = Hasidic Jews

**5: Program Codes** (Complete for Housing and Public and Indian Housing programs only):  
1 = All insured, including Section 8  
2 = Flexible Subsidy  
3 = Section 8 Noninsured, Non-HFDA  
4 = Insured (Management)  
5 = Section 202  
6 = HUD-Held (Management)  
7 = Public/Indian Housing

This report is to be completed by grantees, developers, sponsors, builders, agencies, and/or project owners for reporting contract and subcontract activities of \$10,000 or more under the following programs: Community Development Block Grants (entitlement and small cities); Urban Development Action Grants; Housing Development Grants; Multifamily Insured and Noninsured; Public and Indian Housing Authorities; and contracts entered into by recipients of CDBG rehabilitation assistance.

Contracts/subcontracts of less than \$10,000 need be reported only if such contracts represent a significant portion of your total contracting activity. Include only contracts executed during this reporting period.

This form has been modified to capture Section 3 contract data in columns 7g and 7i. Section 3 requires that the employment and other economic opportunities generated by HUD financial assistance for housing and community development programs shall, to the greatest extent feasible, be directed toward low- and very low-income persons, particularly those who are recipients of government assistance for housing. Recipients using this form to report Section 3 contract data must also use Part I of form HUD-60002 to report employment and training opportunities data. Form HUD-2516 is to be

completed for public and Indian housing and most community development programs. Form HUD-60002 is to be completed by all other HUD programs including State administered community development programs covered under Section 3.

A Section 3 contractor/subcontractor is a business concern that provides economic opportunities to low- and very low-income residents of the metropolitan area (or nonmetropolitan county), including a business concern that is 51 percent or more owned by low- or very low-income residents; employs a substantial number of low- or very low-income residents; or provides subcontracting or business development opportunities to businesses owned by low- or very low-income residents. Low- and very low-income residents include participants in Youthbuild programs established under Subtitle D of Title IV of the Cranston-Gonzalez National Affordable Housing Act.

The terms “low-income persons” and “very low-income persons” have the same meanings given the terms in section 3(b)(2) of the United States Housing Act of 1937. Low-income persons mean families (including single persons) whose incomes do not exceed 80 per centum of the median income for the area, as determined by the Secretary, with adjustments for smaller and larger families, except that the Secretary

may establish income ceilings higher or lower than 80 per centum of the median for the area on the basis of the Secretary’s findings that such variations are necessary because of prevailing levels of construction costs or unusually high or low-income families. Very low-income persons means low-income families (including single persons) whose incomes do not exceed 50 per centum of the median family income for the area, as determined by the Secretary with adjustments for smaller and larger families, except that the Secretary may establish income ceilings higher or lower than 50 per centum of the median for the area on the basis of the Secretary’s findings that such variations are necessary because of unusually high or low family incomes.

Submit two (2) copies of this report to your local HUD Office within ten (10) days after the end of the reporting period you checked in item 4 on the front.

Complete item 7h. only once for each contractor/subcontractor on each semi-annual report.

Enter the prime contractor's ID in item 7f. for all contracts and subcontracts. Include only contracts executed during this reporting period. PHAs/IHAs are to report all contracts/subcontracts.

Community Development Programs

- 1. **Grantee:** Enter the name of the unit of government submitting this report.
- 3. **Contact Person:** Enter name and phone of person responsible for maintaining and submitting contract/subcontract data.
- 7a. **Grant Number:** Enter the HUD Community Development Block Grant Identification Number (with dashes). For example: B-32-MC-25-0034. For Entitlement Programs and Small City multi-year comprehensive programs, enter the latest approved grant number.
- 7b. **Amount of Contract/Subcontract:** Enter the dollar amount rounded to the nearest dollar. If subcontractor ID number is provided in 7f, the dollar figure would be for the subcontract only and not for the prime contract.
- 7c. **Type of Trade:** Enter the numeric codes which best indicates the contractor's/ subcontractor's service. If subcontractor ID number is provided in 7f., the type of trade code would be for the subcontractor only and not for the prime contractor. The "other" category includes supply, professional services and all other activities except construction and education/training activities.
- 7d. **Business Racial/Ethnic/Gender Code:** Enter the numeric code which indicates the racial/ethnic /gender character of the owner(s) and controller(s) of 51% of the business. When 51% or more is not owned and controlled by any single racial/ethnic/ gender category, enter the code which seems most appropriate. If the subcontractor ID number is provided, the code would apply to the subcontractor and not to the prime contractor.
- 7e. **Woman Owned Business:** Enter Yes or No.
- 7f. **Contractor Identification (ID) Number:** Enter the Employer (IRS) Number of the Prime Contractor as the unique identifier for prime recipient of HUD funds. Note that the Employer (IRS) Number must be provided for each contract/subcontract awarded.
- 7g. **Section 3 Contractor:** Enter Yes or No.
- 7h. **Subcontractor Identification (ID) Number:** Enter the Employer (IRS) Number of the subcontractor as the unique identifier for each subcontract awarded from HUD funds. When the subcontractor ID Number is provided, the respective Prime Contractor ID Number must also be provided.
- 7i. **Section 3 Contractor:** Enter Yes or No.
- 7j. **Contractor/Subcontractor Name and Address:** Enter this information for each

Previous editions are obsolete.

firm receiving contract/subcontract activity only one time on each report for each firm.

Multifamily Housing Programs

- 1. **Grantee/Project Owner:** Enter the name of the unit of government, agency or mortgagor entity submitting this report.
- 3. **Contact Person:** Same as item 3 under CPD Programs.
- 4. **Reporting Period:** Check only one period.
- 5. **Program Code:** Enter the appropriate program code.
- 7a. **Grant/Project Number:** Enter the HUD Project Number or Housing Development Grant or number assigned.
- 7b. **Amount of Contract/Subcontract:** Same as item 7b. under CPD Programs.
- 7c. **Type of Trade:** Same as item 7c. under CPD Programs.
- 7d. **Business Racial/Ethnic/Gender Code:** Same as item 7d. under CPD Programs.
- 7e. **Woman Owned Business:** Enter Yes or No.
- 7f. **Contractor Identification (ID) Number:** Same as item 7f. under CPD Programs.
- 7g. **Section 3 Contractor:** Enter Yes or No.
- 7h. **Subcontractor Identification (ID) Number:** Same as item 7h. under CPD Programs.
- 7i. **Section 3 Contractor:** Enter Yes or No.
- 7j. **Contractor/Subcontractor Name and Address:** Same as item 7j. under CPD Programs.

Public Housing and Indian Housing Programs

PHAs/IHAs are to report all contracts/subcontracts. Include only contracts executed during this reporting period.

- 1. **Project Owner:** Enter the name of the unit of government, agency or mortgagor entity submitting this report. Check box as appropriate.
- 3. **Contact Person:** Same as item 3 under CPD Programs.
- 4. **Reporting Period:** Check only one period.
- 5. **Program Code:** Enter the appropriate program code.
- 7a. **Grant/Project Number:** Enter the HUD Project Number or Housing Development Grant or number assigned.
- 7b. **Amount of Contract/Subcontract:** Same as item 7b. under CPD Programs.
- 7c. **Type of Trade:** Same as item 7c. under CPD Programs.
- 7d. **Business Racial/Ethnic/Gender Code:** Same as item 7d. under CPD Programs.
- 7e. **Woman Owned Business:** Enter Yes or No.
- 7f. **Contractor Identification (ID) Number:** Same as item 7f. under CPD Programs.
- 7g. **Section 3 Contractor:** Enter Yes or No.
- 7h. **Subcontractor Identification (ID) Number:** Same as item 7h. under CPD Programs.
- 7i. **Section 3 Contractor:** Enter Yes or No.
- 7j. **Contractor/Subcontractor Name and Address:** Same as item 7j. under CPD Programs.