

2023

The City of Lancaster, Pennsylvania

Consolidated
Annual
Performance and
Evaluation
Report

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



**CITY OF
LANCASTER**

Department of Community Planning & Economic Development

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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)

In 2023, 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 Table 1 and Table 2, 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	186	232.50%	20	150	750.00%
Expand Economic Opportunities	Non-Housing Community Development		Housing Code Enforcement/Foreclo sed Property Care	Household Housing Unit	100	78	78.00%	100	0	0.00%
Homeless Services	Homeless	ESG: \$728,395.00	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	200	128	64.00%	0	0	0%

Homeless Services	Homeless		Homeless Person Overnight Shelter	Persons Assisted	200	135	67.50%	0	0	0%
Increase Affordable Housing Opportunities	Affordable Housing	CDBG: \$1,914,243	Other	Other	60	2	3.33%	2	2	100%
Maintain Affordable, Good Quality Housing	Affordable Housing	CDBG: \$3,577,792	Rental units rehabilitated	Household Housing Unit	50	84	168%	10	64	640%
Maintain Affordable, Good Quality Housing	Affordable Housing		Homeowner Housing Rehabilitated	Household Housing Unit	50	113	226%	10	37	370%
Maintain Affordable, Good Quality Housing	Affordable Housing		Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	3,000	3,346	111.53%	600	1,208	201.33%
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	10,000	84,140	841.40%	1,000	48,975	4897.50%
Promote Neighborhood Quality of Life	Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10,000	7,426	74.26%	1,000	2,480	248%

Promote Neighborhood Quality of Life	Non-Housing Community Development		Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	400	1,410	352.50%	80	562	702.50%
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Table 1 - Accomplishments – Program Year & Strategic Plan to Date

CDBG-CV Goal	Category	CDBG-CV Funding Allocated	Outcome	Expected	Achieved	%
CV – Public Health Services	Non-Housing Community Development	\$844,660.25 – CDBG-CV	Persons Assisted	12,585	141,406	1,123.61%

Table 2 - CDBG-CV 2023 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 Proactive Housing Code Enforcement Program Activity

The Proactive 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 \$355,576 of its 2023 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 2023, 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 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 1,029 rental properties brought successfully up to code to help improve the quality and safety of housing in predominately disadvantaged and deteriorating neighborhoods, providing overall direct and indirect benefits to residents of the Service Area. Additionally, this project supported health and safety efforts to address childhood lead poisoning instances and enforce the City's recent Lead Ordinance seeking lead poisoning prevention and lead hazard control. Specifically, the City worked to address 44 cases of active elevated blood lead levels (EBLL) in children, conducting 33 home visits and successfully closing 19 cases in the targeted service area in 2023.

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 2023, the City also provided the following improvements and services through this program within the Code Enforcement Area:

- (1) Championed public education through a series of engagement initiatives, such as townhall discussions and resident forums, successfully keeping the community informed of standard procedural updates and ordinance changes;
- (2) Collaborated with multiple departments, including social services and the police, in community block walks in targeted areas. This collaboration successfully secured assistance with the critical repair and lead grant programs and offered guidance to access health insurance benefits;
- (3) Successfully integrated Lead Hazard evaluations into our operations to assess and improve the health of housing conditions;
- (4) Enhanced overall program operational efficiency and ensured departmental accountability through a revised inspection structure resulting in 4,134 completed systematic inspections within a ten-month period. Notably, we achieved a 40% increase in new rental inspections and a 50% increase in systematic inspections, even with the inclusion of Lead Hazard evaluations. The focus on sustainability led to a remarkable 54% reduction in re-inspections; and finally,

- (5) The successful achievements of the program have garnered significant interest from municipalities and government agencies, including the City of Reading, the City of Wilmington Delaware and the National Center for Healthy Housing of HUD's Office of Policy Development and Research, to develop potential partnerships and adopt the successful practices employed by the Bureau within their own municipalities.

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

In 2023, the Critical Repair Program, Lead Hazard Control Program, and Critical Repair and Lead Hazard Control Program Activities leveraged CDBG dollars to help fund affordable housing preservation and improvement projects. 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 8, 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 2023, the City utilized CDBG funding to make 97 homes lead-safe and provided critical repairs to 7 households. A total of 101 projects took place at 66 household units (total also includes households funded with the City's HUD Lead, Healthy Homes, and PA Department of Health grants but administratively supported by the Critical Repair and Lead Hazard Reduction Program Administration activity), with some properties receiving both Critical Repair and Lead Hazard Reduction Program support. 28.79% percent of households assisted were extremely-low income (<30% Area Median Income), 43.94% were low-income (30% - 50% Area Median Income), and the remaining 27.27% were moderate-income (51% - 80% Area Median 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. In 2023, the City committed \$429,362 of 2021 CDBG entitlement funding to use for furthering this effort in the form of a Scattered Site Rehabilitation Project in collaboration with SACA Development

Corporation which will support the rehabilitation of five (5) single-family housing units for sale to low- to moderate-income homebuyers. In 2023, SACA completed the rehabilitation of two (2) single family homes and successfully sold them to two (2) low-income households. This project is currently ongoing and expected to continue through mid-2024.

Additionally, the City allocated \$163,551 in FY2022 CDBG funding to support Partners with Purpose's (PWP) scattered site rehabilitation program, subsidizing the rehabilitation of four (4) single-family homes for rental to low- to moderate-income families. This project commenced in Q4 of 2023 and is expected to continue through 2024. Final accomplishment data will therefore be reported in the City's 2024 CAPER.

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 FY2022 and \$20,000 of the City's FY2023 CDBG dollars were committed to and are helping to fund this program from July 1, 2022 to June 30, 2023 (FY2022) and July 1, 2023 to June 30, 2024 (FY2023), respectively. 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 2023, the HRRC utilized a portion of the City's FY2022 and FY2023 CDBG dollars to accomplish following outcomes:

- Completed 189 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.
- Hosted Fair Housing workshops throughout the City.
- Provided technical assistance on Fair Housing issues including facilitating mediations for individuals and assisting in submitting Fair Housing complaint questionnaires to the proper City and/or State enforcement entities, as needed.
- Developed, produced, and distributed the Landlord & Tenant Fair Housing Guide in multiple languages, hosting an electronic version online and distributing hard copies to

City residents and community partners to facilitate accessibility of information.

A total of 189 City residents were served through this activity in 2023, with 86.77% considered to be very-low, low- or moderate-income, receiving direct housing support services from the HRRC. These services included providing fair housing rights information, guidance, and counsel to landlords and tenants on eviction, implied warranty, harassment and intimidation, refusal to rent, security deposits, lease terms and conditions, requests for housing, discrimination, 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.

FY2022 and FY2023 CDBG dollars were committed to and spent on the Place-Based Streetscape Improvements Program. In 2023, this money assisted in subsidizing City's Pedestrian Improvements Project and the City's ADA Ramp projects:

- (1) **Pedestrian Improvements Projects:** The City made improvements to intersections throughout low-moderate income neighborhoods to improve pedestrian accessibility and safety at the following crossroads:

N/S Street	E/W Street	N/S Street	E/W Street
Ann	Fulton	Market	Orange
Ann	Marion	Marshall	New Holland
Ann	Orange	Mary	King
Ann	Grant	Mary	Orange
Ann	Mifflin	Mulberry	Harrisburg
Ann	East End	Nevin	Orange
Cherry	Orange	Pearl/College	King
Christian	King	Pine	Harrisburg
Church	Pershing	Pine	Orange
College	Harrisburg	Pine/Old Dorwart	King
Duke	Frederick	Plum	New Holland
Duke	James	Queen	Frederick
Duke	Chestnut	Queen	James
Duke	Orange	Queen	Grant
Duke	Grant	Queen	King
Duke	Mifflin	Queen	Andrew
Duke	Vine	Queen	Hazel

F&M	Harrisburg		Queen	Highland
Fourth	Manor		Reiker/Caroline	Manor
Franklin	New Holland		Reservoir	Orange
Franklin	King		Shippen	King
Laurel	Manor		Shippen	Orange
Manor	Filbert			

(2) **ADA Ramp Improvements:** The City made ADA ramp accessibility improvements at the following locations in the City using CDBG dollars:

- a. Chester Street from South Duke to East Strawberry
- b. E. Filbert Street from Conestoga to St. Joseph
- c. Fremont Street from Hershey Ave/Euclid to Euclid Ave/Charles
- d. S. Broad from King to Almanac
- e. Seymour Street from Prospect to Fairview
- f. W. Vine Street from Beaver to S. Water
- g. Alley 12 SE from Chesapeake to Highland
- h. Alley 126 NE from N. Ann to N. Marhsall

In 2023, this program has directly contributed to improving the neighborhood quality of life for 32,265 residents through the Pedestrian Street Improvements project and 16,710 residents through ADA ramp improvements.

The Neighborhood Crime Reduction through Police Social Worker Activity

The City dedicated \$1,000 of 2023 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 2023 Program Year, this program assisted 380 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 Health and Housing Social Worker Program Activity

The City's Health and 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. In 2023, the Health and

Housing Social Worker assisted 373 community members in resolving persistent health and housing-related issues to help them locate and secure affordable housing opportunities in the City, with 91.42% of the beneficiaries assisted being low-and moderate-income. The Health and 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. \$75,000 of the City's FY2023 CDBG funding was allocated to support this critical work.

The Neighborhood Engagement Program Manager Activity

This project is designed to support the Department of Neighborhood Engagement (DoNE) in their efforts to improve the quality of life for our community through collaboration and the development of well-rounded, resident-lead strategies and increased collaboration between the community and City government through providing financial assistance for DoNE Program Management activities. The purpose of this activity is to provide project management support for the City's core neighborhood engagement initiatives and activities in order to promote and enhance neighborhood quality of life. \$80,000 in FY2023 CDBG funding was allocated to help further these efforts.

In 2023, the Public Service City Project Manager activity implemented three (3) programs in order to improve the quality of life for City residents and create opportunities for dialogue, learning, partnership, civic leadership building, and action between the city government and neighborhood residents. Specifically, this activity supported the following City initiatives:

- (1) Love Your Block: 2100+ City residents served
- (2) Neighborhood Leaders Academy: TBD
- (3) AmeriCorps VISTA: TBD

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.

During 2023, this program utilized \$20,000 in FY2023 CDBG funding, served 150 City participants, 65.33% of whom were of low- and moderate-income, seeking to start or expand microenterprises thereby empowering them with the necessary training, support, and financial resources necessary for successful small business development and positively contributing to the economic development of the City of Lancaster by expanding small business opportunities. A total of 9 new and 27 existing businesses were directly assisted through this program.

\$20,000 of FY2023 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, 2023 through June 30, 2024. 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.

In 2023, the City did not receive ESG entitlement funding. Additionally, it expended all remaining FY2021 ESG funding in 2022 and was therefore unable to implement any ESG-supported activities this program year. The City continues to seek funding to support homelessness services from alternative sources to continue to meet community needs.

2023 CDBG-CV ACTIVITIES

In 2023, 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 2023 Program Year activities undertaken by the City utilizing this funding to support this effort.

CDBG-CV Goal: Public Health Services (FY2019 Goal – Create Suitable Living Environment)

Community Health Needs Assessment Planning and Administration

In 2023, the City began implementing its City-focused health and wellbeing assessment to collect and analyze quantitative and qualitative resident data to identify and address individual and communal health needs, gaps, and disparities as a result of the COVID-19 pandemic. It has programmed \$200,000 in CDBG-CV funding to support this effort. Throughout the past year, it began initial project planning, securing a local women-owned consultant to assist with the assessment. In addition, project information sharing and dissemination commenced throughout the community, with over 1,000 residents meaningfully engaged and 19 organizations joining

the project's Advisory Committee. Data collection efforts will begin in earnest in Q2 of 2024. Additional project outcomes will be reported in next year's CAPER.

Emergency Overnight and Drop-In Day Shelter Program

The City provided \$75,000 of its Public Health Services CDBG-CV programmed funding to the Lancaster City Housing and Redevelopment Authority to help implement its Emergency Overnight and Drop-In Day Shelter program to help address the health, safety, and homelessness challenges exacerbated by the pandemic. In 2023, this program helped ensure that 121 persons were provided with adequate, safe, and hygienic shelter opportunities during times of extreme cold and heat. Of the total population supported, 74 persons were provided with housing support, 2 received health support, 3 received substance abuse referrals, 73 received improved food access and 74 received improved clothing access.

The Mobile Hygiene Unit Activity

Since December of 2021, the Mobile Hygiene Unit (MHU) 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 2023, the MHU served 441 City beneficiaries who have been negatively impacted by COVID-19, providing a total of 915 showers, distributing 46 laundry vouchers and conducting 55 medical visits encompassing blood pressure checks. The service also connect participants to food and clothing resources and provided health referrals. 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.

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	672	0
Black or African American	315	0
Asian	19	0
American Indian or Alaskan Native	2	0
Native Hawaiian or Other Pacific Islander	0	0
Black or African American, & White	2	0
American Indian/Alaskan Native & Black	0	0
Other Multiracial	315	0
Unable to Obtain	15	0
Total	1342	0
Ethnicity		
Hispanic	442	0
Not Hispanic	900	0
Unable to Obtain	0	0
Total	1342	0

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

Narrative

These statistics only include data from CDBG activities that were performed in 2023 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 Health and Housing Social Worker Program Activity
4. The Small Business Development Activity
5. The Affordable Housing Development Solutions Activity
6. The Mobile Hygiene Unit (CDBG-CV)
7. The Emergency Overnight and Drop-In Day Shelter Activity (CDBG-CV)

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 (2022 Census Data)* for more specific information about the racial and ethnic composition of the City.

Race and Hispanic Origin	
White alone, percent	51.5%
Black or African American alone, percent (a)	17.4%
American Indian and Alaska Native alone, percent (a)	0.4%
Asian alone, percent (a)	2.7%
Native Hawaiian and Other Pacific Islander alone, percent (a)	0.1%
Two or More Races, percent	14.8%
Hispanic or Latino, percent (b)	39.4%
White alone, not Hispanic or Latino, percent	38.9%

Image 1 - Demographics of the City of Lancaster, PA (2023 U.S. Census Bureau Data, based on 2022 American Community Survey 5-Year Estimates)

CR-15 – Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available in 2023	Amount of Funding Expended During Program Year
CDBG	Public - Federal	\$1,586,161.67	\$1,716,163.16
ESG	Public - Federal	\$0	\$0
CDBG-CV	Public - Federal	\$628,075.14	\$94,459.23

Table 4 - Resources Made Available

Narrative

The above expenditures represent CDBG spending that occurred during the 2023 Program Year (January 1, 2023 – December 20, 2023) to support the goals and activities outlined in the City's 2021 – 2025 Consolidated Action Plan and 2023 Annual Action Plan. FY2023 CDBG entitlement funds were subcontracted to subrecipients for the period of July 1, 2023 – June 30, 2024. As such, six (6) months of spending is included in the figures above and all remaining funding will be expended during 2023.

Included in this table under "Other" are the CDBG-CV resources made available in 2020/2021 and expended in the 2023 Program Year. The City plans to utilize the remaining CV funding in 2024 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 CPD funds in 2023 were spent in the City of Lancaster, with a focus on primarily benefitting predominately low- and moderate-income areas and City residents.

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 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 utilized CDBG funding to supplement other state grant funds such as a Keystone Grant as well as City Capital Improvement funds. The Critical Repair and Lead Hazard Control Programs continued to leverage 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 Proactive Housing Code Enforcement Program, the DoNE Program Management Program, 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.

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	0	0
Number of Non-Homeless households to be provided affordable housing units	127	630
Number of Special-Needs households to be provided affordable housing units	0	0
Total	127	630

Table 6 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	2	2
Number of households supported through Rehab of Existing Units	20	66
Number of households supported through Acquisition of Existing Units	0	0
Total	22	68

Table 7 – Number of Households Supported

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

In 2023, the City collectively met or exceeded the goals and outcomes it had established to further affordable housing. Overall, however, the City exceeded its housing rehabilitation goals by 496%.

The City of Lancaster made concerted efforts to address “worst case needs” and meet the needs of persons with disabilities regarding affordable housing in 2023. In 2023, the City completed 101 total affordable housing projects utilizing CDBG funding that rectified critical repair and lead hazard control issues, assisting 66 total households, the majority completed for very-low income (19) and low-income (29) households through a grant mechanism, ensuring continued access to affordable, quality housing for very-low-income residents and those with a status of being housing cost burdened. The City will continue work that supports these vulnerable populations in 2024.

The City worked to meet the affordable housing needs of persons with disabilities by providing education and support to program staff and partner organizations on proper income verification requirements as they pertain to disabled households. This was done to ensure proper eligibility determination for disabled households to prevent them from being unduly disqualified from receiving affordable housing assistance due to an improper income verification process as it relates to live-in aides. The City's Critical Repair and Healthy Homes programs included adaptations to homes providing improved safety and accessibility to meet the housing needs of disabled households. Further, the City's Fair Housing program, implemented by subrecipient partner Tenfold, provided affordable and fair housing support for persons with disabilities through the CDBG-assisted Fair Housing Services activity. They oversaw set-aside units in the City and supported persons with disabilities in filing fair housing complaints and submitting reasonable modification and accommodation requests.

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 Health and Housing Social Worker activity, which assisted 341 City residents in accessing affordable housing, over seventeen times its initial annual goal of 20 people and a quantifiable increase in the service since 2021. 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 within future action plans to sufficiently adjust the activity to achieve our overall strategic goals and ensure that our community's housing needs are fully addressed efficiently and effectively.

The City did not receive FY 22 ESG Entitlement funding and does not anticipate receiving FY 23 ESG Entitlement funding. Future annual action plans may reflect a reduction in available resources and associated outcomes. However, the City continues work to identify and secure alternative funding opportunities from Federal, State, and local sources to address this funding deficit.

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	336
Low-income	179

Moderate-income	58
Above Moderate-income	12
Unable to Obtain	45
Total	630

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 2023 Program Year. This data can be further distilled by income level and activity, included below:

The Critical Repair and Lead Hazard Control Program Activities: 66 Low-and Moderate-Income Beneficiaries (100% LMI)

- Extremely Low-Income: 19 households
- Low-Income: 29 households
- Moderate-Income: 18 households

The Fair Housing Services Program Activity: 164 Low- and Moderate-Income Beneficiaries (86.77% LMI)

- Extremely Low-Income: 113 households
- Low-Income: 35 households
- Moderate-Income: 16 households

The Health and Housing Social Worker Program Activity: 341 Low- and Moderate-Income Beneficiaries (91.42% LMI)

- Extremely Low-Income: 204 households
- Low-Income: 114 households
- Moderate-Income: 23 households

The Affordable Housing Development Solutions Program: 2 Low- and Moderate-Income Beneficiaries (100% LMI)

- Extremely Low-Income: 204 households
- Low-Income: 114 households
- Moderate-Income: 23 households

Overall in 2023, the City provided direct affordable housing benefit to 630 total households through HUD-assisted programming. Specifically, it served 336 extremely-low-income households, 179 low-income households, and 8 moderate-income households, resulting in a total of 573 low-and moderate-income household who represent 90.95% of the City's total CDBG-supported direct affordable housing program clientele, thereby furthering HUD's Community Planning & Development (CPD) Program goal of providing tangible affordable housing benefit to 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://lanasterpa.maps.arcgis.com/apps/MapSeries/index.html?appid=5e8866dfe5654c94998e1949e06f123e>, which details relevant investments the City has made in housing projects.

Please see CR-05 - Goals and Outcomes for more information on the impact of all services provided to City residents. Additionally, please see Image 1, on page 15 above 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.

DRAFT

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 CDBG activities such as the Public Service Outreach Worker, the Mobile Hygiene Unit, the Emergency Overnight and Drop-In Day Shelter Program and the Health and Housing Social Worker. However, the City did not receive an FY2023 ESG Entitlement Award and therefore did not have adequate resources to perform significant outreach to homeless persons and our efforts to assess their individual needs were limited to resources readily available.

In the absence of direct ESG FY2023 entitlement funding, we leveraged our partnerships with the Lancaster County Redevelopment Authority, Homelessness Coalition, and Continuum of Care to support the administration and delivery of services to ensure that homelessness needs were adequately met utilizing the available resources. The City applied for DCED ESG funding in 2023 to help fill these funding gaps.

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 Homelessness Coalition 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 2023 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), Food Hub (overnight) 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.

City/County HOME-ARP funding has been awarded to projects that further transitional/supportive housing projects in the City. They will add an additional 12 units to the City's transitional/supportive housing stock.

The City also utilized CDBG-CV funding in 2023 to support expanded Emergency Overnight and Drop-In Day Shelter programs with the Coalition, providing funding to support emergency shelter service provision during instances of extremely cold weather (Code Blue) and hot weather (Code Red), adding additional bed capacity.

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.

Both the LCCH and the Re-entry Coalition are operated under the purview of the Lancaster County Redevelopment Authority in an effort to streamline the provision 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 one (1) rapid re-housing activity program "Shelter To Independent Living Program."

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 2023, 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. In addition, the City seeks to secure additional funding to support Public Housing improvements through City ARPA allocations and external grant application processes.

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” and to reduce barriers to affordable housing for City residents. 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 2023 Program Year:

The City continued to implement the Health and 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. The City also 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 Health and Housing Social Worker provides bilingual English and Spanish support to further reduce access barriers to accessing affordable housing.

City staff worked with the Redevelopment Authority of the City of Lancaster to implement income and affordability requirements to generate improved affordable housing opportunities for its low- and moderate-income residents. Moreover, in 2023, the City committed \$7.4 million of its ARPA funding to nine (9) projects increasing the number and quality of affordable housing units through the creation of 85 new affordable housing units and preservation of 443 affordable housing units through renovation.

Further, the City’s Interim Housing Strategy continues to guide policy and funding decisions and 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 of 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 the City's Interim Housing Strategy is included as an attachment to this report.

Furthermore, the City is finalized its Comprehensive Plan in 2023, which was 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 since 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.

However, the City did not receive a FY2023 ESG Entitlement Award and therefore the plight of addressing the needs of the underserved did not fulfill our strategic goals.

Specifically, the City completed the following actions during the 2023 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 Health and 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.
- In 2023, the City commenced activities to complete a Community Health Needs Assessment (CHNA) utilizing CDBG-CV funding in order to identify analyze unmet health needs exacerbated by the pandemic utilizing a Social Determinants of Health (SDOH) framework. Findings from the CHNA will form a data-driven basis for the City to develop and implement inclusive, equitable solutions that reduces barriers to resident wellbeing and improve overall community health.
- The City provided funding to two (2) affordable housing development organization in 2023 to create homeownership and rental opportunities for low-income City residents through the rehabilitation of five (5) single family scattered site homes for sale and four (4) single family scattered site homes for rental.
- The City applied to HUDs PRO Housing Grant Application in 2023 seeking to secure up to \$10M in grant dollars to support the planning and development of affordable housing and help implement our recently adopted Comprehensive Plan.

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 five Census tracts (8, 9, 10, 14, and 147) in the southern and eastern half of the City where 16,350 residents live. In 2022, Census Tract 8 was added to expand the program's impact and meet an unmet need. An overwhelming majority 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. Furthermore, over 81.3% of families in the target area have low incomes and 82.21% the population is a minority (including 60.12% Hispanic), meaning that this is a problem that is disproportionately affecting the City's most vulnerable populations.

In 2023, 97 properties were addressed by the City's lead programming to reduce lead-based paint hazards. Additionally, the City updated its Lead Hazard Control ordinance in early 2022 formally requiring all rental properties built prior to 1978 to maintain lead-safe certification, all day care centers and facilities to maintain lead-safe certification, and all Lancaster City Housing Authority properties to maintain lead-safe certification.

Over the next five years, the City of Lancaster will successfully make 500 housing units 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 2023, 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 programs represent actions that City undertook in 2023 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 Health and 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 Proactive 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. *The Affordable Housing Development Solutions Activity:* Furthering efforts to create and sustain affordable homeownership and rental opportunities for nine (9) households.

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.

CPED worked to collaborate within and across departments and organizations to develop feasible, inclusive, and equitable solutions to addressing homelessness. For example, a Homelessness Response Team (HRT) was stood up connecting key decision makers in the City from the Bureaus of Health and Police, Parks Department, and Community Development to strategize and coordinate policy and implementation approaches. Further, CPED joined the LCHC on their joint funding efforts with the Bureau Chief of Lead Safety and Community Development serving as Vice Chair of the committee.

Moreover, 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 2023, 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 Homelessness Coalition
- Lancaster County HOME Consortium
- Emergency Food and Shelter Program (Local Board)
- SoWe: Southwest Neighbors
- Elm Street Revitalization Program for Southeast Lancaster
- Beaver Street Working Group
- Homelessness Response Team
- Eviction Prevention Network
- Tenfold's Housing Rights and Resource Center
- PA Shelter Taskforce
- PA Feeding Taskforce
- Housing Rights and Resource Center

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 and the Lancaster County Homelessness Coalition. 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 Lancaster County Homelessness Coalition to streamline provision of affordable housing and supportive services.

Through the Police Social Worker activity, the City has also taken actions to enhance coordination between itself, the Bureau of Police, and local health, housing, and social service agencies to meet the intersecting needs of residents. This activity provides a mechanism to collocate and enhance public and private coordination that provides direct assistance to City residents providing a connection to the appropriate agencies and 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 Lancaster County Homelessness Coalition, 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 2023, 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 (HRRC) 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. 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 2023 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 2023, 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. Work with local disability organizations to explore creation of housing opportunities that will increase housing choice for this community.
2. Provide 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. One (1) Fair Housing Summit – format and date dependent on COVID-19 restrictions and safety measures. Cancellation may be necessary.

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. Provide Fair Lending information to consumers through homebuyer classes.
2. Host one (1) Fair Lending network event for city lending institutions – format and date dependent on COVID-19 restrictions and safety measures. Cancellation may be necessary.

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. Work 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. Utilize telephonic language lines to serve consumers with varying language needs.
4. Utilize 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-assisted activities. Additionally, the City, in collaboration with the Lancaster County Homelessness Coalition 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 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

The City utilizes various policies and procedures to help ensure that it takes the appropriate affirmative steps to encourage Minority Business Enterprise (MBE) participation in its projects and to monitor for compliance. The City is operating with a general standard to include MBE participation in its construction projects to the greatest extent practicable and works to divide larger projects into smaller tasks to promote and encourage equitable participation by MBEs as a best practice.

In 2023, the Office of Lead Safety provided Lead Renovation, Repair, and Painting trainings in coordination with Thaddeus Stevens and Tec Centro to promote inclusion of MBEs in Lead Hazard Control Program contracting opportunities. Additionally, the City includes an Affirmative Marketing component to MBEs in its procurement contracts to encourage and track MBE participation. The City employs HUD Form 2516 to help monitor MBE participation and compliance, which is compiled and reviewed with internal stakeholders at the initiation and completion of all applicable projects. Further, the City has instituted quarterly subrecipient monitoring meetings which serve as touch points to track progress in MBE project participation for all applicable activities.

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 will be placed in the City of Lancaster's most prominent local newspaper, the LNP, on Tuesday, March 12, 2023, announcing a 16-day public comment period that conclude on March 27, 2023.

A copy of the draft report will be posted on the City's website on March 11th, 2023 and a hard copy version of the report was made available in City Hall during this period. A public meeting was also be held at City Hall in City Council Chambers on Thursday March 21st at 12:00 PM and streamed online with the recording available on the City's YouTube page. The City will also solicit comments and feedback on its 2023 performance report via the following link:

<https://www.cityoflanasterpa.gov/departments/department-of-community-planning-economic-development/health-housing-community-development-division/bureau-of-lead-safety-community-development/>

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 2023, 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

2023 CAPER APPENDICES

Appendix 1: 2023 CDBG and CDBG-CV Financial Summary (Activity and Grant Level Summary)

Appendix 2: Citizen Participation Plan

Appendix 3: Public Comment Period Notice and Proof of Publication

Appendix 4: City of Lancaster U.S. Census Bureau Demographic Information (2021 Inflation Adjusted Dollars)

Appendix 5: Interim Housing Strategy

Appendix 6: Language Access Plan

Appendix 7: 2023 Section 3 Reporting: TBD

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PART I: SUMMARY OF CDBG RESOURCES

01 UNEXPENDED CDBG FUNDS AT END OF PREVIOUS PROGRAM YEAR	2,131,650.01
02 ENTITLEMENT GRANT	1,524,362.00
03 SURPLUS URBAN RENEWAL	0.00
04 SECTION 108 GUARANTEED LOAN FUNDS	0.00
05 CURRENT YEAR PROGRAM INCOME	61,799.67
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)	3,717,811.68

PART II: SUMMARY OF CDBG EXPENDITURES

09 DISBURSEMENTS OTHER THAN SECTION 108 REPAYMENTS AND PLANNING/ADMINISTRATION	1,492,434.22
10 ADJUSTMENT TO COMPUTE TOTAL AMOUNT SUBJECT TO LOW/MOD BENEFIT	0.00
11 AMOUNT SUBJECT TO LOW/MOD BENEFIT (LINE 09 + LINE 10)	1,492,434.22
12 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	223,728.94
13 DISBURSED IN IDIS FOR SECTION 108 REPAYMENTS	0.00
14 ADJUSTMENT TO COMPUTE TOTAL EXPENDITURES	0.00
15 TOTAL EXPENDITURES (SUM, LINES 11-14)	1,716,163.16
16 UNEXPENDED BALANCE (LINE 08 - LINE 15)	2,001,648.52

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	1,492,434.22
20 ADJUSTMENT TO COMPUTE TOTAL LOW/MOD CREDIT	0.00
21 TOTAL LOW/MOD CREDIT (SUM, LINES 17-20)	1,492,434.22
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	153,745.67
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)	153,745.67
32 ENTITLEMENT GRANT	1,524,362.00
33 PRIOR YEAR PROGRAM INCOME	55,632.06
34 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PS CAP	0.00
35 TOTAL SUBJECT TO PS CAP (SUM, LINES 32-34)	1,579,994.06
36 PERCENT FUNDS OBLIGATED FOR PS ACTIVITIES (LINE 31/LINE 35)	9.73%

PART V: PLANNING AND ADMINISTRATION (PA) CAP

37 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	223,728.94
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)	223,728.94
42 ENTITLEMENT GRANT	1,524,362.00
43 CURRENT YEAR PROGRAM INCOME	61,799.67
44 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PA CAP	0.00
45 TOTAL SUBJECT TO PA CAP (SUM, LINES 42-44)	1,586,161.67
46 PERCENT FUNDS OBLIGATED FOR PA ACTIVITIES (LINE 41/LINE 45)	14.11%



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

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

No data returned for this view. This might be because the applied filter excludes all 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
2021	8	2003	6747799	Community Facilities Improvements - Rec Center HVAC Replacement	03E	LMA	\$1,350.00
					03E	Matrix Code	\$1,350.00
2021	7	1929	6747799	Place-based Streetscape Improvement	03K	LMA	\$9,342.78
2022	8	2025	6747799	2022 Place-based Streetscape Improvements	03K	LMA	\$45,437.51
2022	8	2025	6810659	2022 Place-based Streetscape Improvements	03K	LMA	\$164,562.49
2023	8	2072	6829017	2023 Place-based Streetscape Improvements	03K	LMA	\$198,056.25
					03K	Matrix Code	\$417,399.03
2021	10	1931	6751754	Neighborhood Crime Reduction through Police Social Worker Program	05I	LMA	\$1,793.90
2021	10	1931	6810659	Neighborhood Crime Reduction through Police Social Worker Program	05I	LMA	\$7,515.49
2021	10	1931	6820637	Neighborhood Crime Reduction through Police Social Worker Program	05I	LMA	\$1,425.92
2021	10	1931	6829017	Neighborhood Crime Reduction through Police Social Worker Program	05I	LMA	\$3,066.52
					05I	Matrix Code	\$13,801.83
2022	11	2026	6751754	2022 Health and Housing Social Worker Program	05X	LMC	\$15,866.77
2022	11	2026	6810659	2022 Health and Housing Social Worker Program	05X	LMC	\$15,216.85
2023	11	2073	6810659	2023 Health & Housing Social Worker	05X	LMC	\$21,782.36
2023	11	2073	6820637	2023 Health & Housing Social Worker	05X	LMC	\$8,785.80
2023	11	2073	6829017	2023 Health & Housing Social Worker	05X	LMC	\$7,028.64
					05X	Matrix Code	\$68,680.42
2022	9	2027	6751754	2022 Public Service City Project Manager	05Z	LMA	\$18,390.91
2022	9	2027	6810659	2022 Public Service City Project Manager	05Z	LMA	\$27,409.12
2022	9	2027	6820637	2022 Public Service City Project Manager	05Z	LMA	\$14,146.33
2022	9	2027	6829017	2022 Public Service City Project Manager	05Z	LMA	\$11,317.06
					05Z	Matrix Code	\$71,263.42
2018	7	2002	6738543	445 N Prince Street	14A	LMH	\$9,426.00
2021	6	2064	6824593	Affordable Housing Development Solutions: Scattered Site Single-Family Rehabilitation	14A	LMH	\$118,080.27
2021	6	2064	6829017	Affordable Housing Development Solutions: Scattered Site Single-Family Rehabilitation	14A	LMH	\$136,141.45
2022	5	2047	6747799	944 E Walnut Street	14A	LMH	\$9,100.00
2022	5	2048	6747799	545 S Prince Street	14A	LMH	\$8,900.00
2022	7	2077	6831521	2022 Affordable Housing Development Solutions - Scattered Site Single Family Rehab	14A	LMH	\$163,549.80
2023	5	2065	6820637	630 S Ann Street	14A	LMH	\$4,000.00
2023	5	2078	6831521	834 N Reservoir Street	14A	LMH	\$8,717.00
					14A	Matrix Code	\$457,914.52
2020	9	1849	6751754	Critical Repair and Lead Hazard Reduction Program Admin	14H	LMC	\$17,354.81
2020	9	1849	6810659	Critical Repair and Lead Hazard Reduction Program Admin	14H	LMC	\$60,567.68
2020	9	1849	6820637	Critical Repair and Lead Hazard Reduction Program Admin	14H	LMC	\$525.08
2020	9	1849	6824593	Critical Repair and Lead Hazard Reduction Program Admin	14H	LMC	\$263.08
2021	4	1934	6747799	Critical Repair and Lead Hazard Reduction Program Admin	14H	LMH	\$847.16
2021	4	1934	6751754	Critical Repair and Lead Hazard Reduction Program Admin	14H	LMH	\$1,558.89
2021	4	1934	6810659	Critical Repair and Lead Hazard Reduction Program Admin	14H	LMH	\$621.75
2022	3	2015	6747799	2022 Critical Repair and Lead Hazard Control Program Administration	14H	LMH	\$1,277.37
2022	3	2015	6751754	2022 Critical Repair and Lead Hazard Control Program Administration	14H	LMH	\$16,124.06
2022	3	2015	6810659	2022 Critical Repair and Lead Hazard Control Program Administration	14H	LMH	\$6,239.41
2022	3	2015	6820637	2022 Critical Repair and Lead Hazard Control Program Administration	14H	LMH	\$22,894.54
2022	3	2015	6824593	2022 Critical Repair and Lead Hazard Control Program Administration	14H	LMH	\$142.40
2022	3	2015	6829017	2022 Critical Repair and Lead Hazard Control Program Administration	14H	LMH	\$26,595.65
2023	3	2070	6810659	2023 Critical Repair and Lead Hazard Control Program Administration	14H	LMH	\$1,429.12
2023	3	2070	6824593	2023 Critical Repair and Lead Hazard Control Program Administration	14H	LMH	\$149.77
					14H	Matrix Code	\$156,590.77
2019	6	2021	6747799	570 S Duke Street	14I	LMH	\$1,986.00

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2019	6	2023	6747799	532 S Duke Street	14I	LMH	\$1,986.00
2019	6	2031	6751754	55 S Franklin Street	14I	LMH	\$2,763.00
2019	6	2050	6751754	56 Locust Street	14I	LMH	\$1,906.00
2019	6	2051	6751754	516 Pershing Avenue	14I	LMH	\$1,954.00
2019	6	2052	6751754	33 Caroline Street	14I	LMH	\$881.00
2019	6	2053	6751754	636 S Queen Street	14I	LMH	\$1,180.00
2019	6	2054	6751754	433 St Joseph Street	14I	LMH	\$845.00
2019	6	2055	6751754	724 S Queen Street	14I	LMH	\$677.00
2019	6	2056	6751754	613 Beaver Street	14I	LMH	\$413.00
2019	6	2057	6751754	524 Woodward Street	14I	LMH	\$1,693.00
2019	6	2058	6751754	634 St Joseph Street	14I	LMH	\$5,130.00
2019	6	2059	6810659	119 Coral Street	14I	LMH	\$2,116.00
2019	6	2060	6810659	626 S Ann Street	14I	LMH	\$306.00
2019	6	2061	6810659	33 Coral Street	14I	LMH	\$1,097.00
					14I	Matrix Code	\$24,933.00
2021	5	1926	6751754	Housing Code Enforcement	15	LMA	\$26,902.15
2021	5	1926	6810659	Housing Code Enforcement	15	LMA	\$695.49
2022	6	2024	6747799	2022 Proactive Housing Code Enforcement	15	LMA	\$2,418.53
2022	6	2024	6751754	2022 Proactive Housing Code Enforcement	15	LMA	\$10,128.06
2022	6	2024	6810659	2022 Proactive Housing Code Enforcement	15	LMA	\$11,807.97
2022	6	2024	6820637	2022 Proactive Housing Code Enforcement	15	LMA	\$26,166.26
2023	6	2071	6810659	2023 Proactive Housing Code Enforcement	15	LMA	\$71,202.90
2023	6	2071	6820637	2023 Proactive Housing Code Enforcement	15	LMA	\$82,527.63
2023	6	2071	6824593	2023 Proactive Housing Code Enforcement	15	LMA	\$558.85
2023	6	2071	6829017	2023 Proactive Housing Code Enforcement	15	LMA	\$28,093.39
					15	Matrix Code	\$260,501.23
2022	12	2029	6824593	2022 Small Business Development (Microenterprise Development)	18C	LMC	\$20,000.00
					18C	Matrix Code	\$20,000.00
Total							\$1,492,434.22

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
2021	10	1931	6751754	No	Neighborhood Crime Reduction through Police Social Worker Program	B21MC420010	EN	05I	LMA	\$1,793.90
2021	10	1931	6810659	No	Neighborhood Crime Reduction through Police Social Worker Program	B21MC420010	EN	05I	LMA	\$7,515.49
2021	10	1931	6820637	No	Neighborhood Crime Reduction through Police Social Worker Program	B21MC420010	EN	05I	LMA	\$1,425.92
2021	10	1931	6829017	No	Neighborhood Crime Reduction through Police Social Worker Program	B21MC420010	EN	05I	LMA	\$3,066.52
									05I Matrix Code	\$13,801.83
2022	11	2026	6751754	No	2022 Health and Housing Social Worker Program	B22MC420010	EN	05X	LMC	\$15,866.77
2022	11	2026	6810659	No	2022 Health and Housing Social Worker Program	B22MC420010	EN	05X	LMC	\$15,216.85
2023	11	2073	6810659	No	2023 Health & Housing Social Worker	B23MC420010	EN	05X	LMC	\$21,782.36
2023	11	2073	6820637	No	2023 Health & Housing Social Worker	B23MC420010	EN	05X	LMC	\$8,785.80
2023	11	2073	6829017	No	2023 Health & Housing Social Worker	B23MC420010	EN	05X	LMC	\$7,028.64
									05X Matrix Code	\$68,680.42
2022	9	2027	6751754	No	2022 Public Service City Project Manager	B22MC420010	EN	05Z	LMA	\$18,390.91
2022	9	2027	6810659	No	2022 Public Service City Project Manager	B22MC420010	EN	05Z	LMA	\$27,409.12
2022	9	2027	6820637	No	2022 Public Service City Project Manager	B22MC420010	EN	05Z	LMA	\$14,146.33
2022	9	2027	6829017	No	2022 Public Service City Project Manager	B22MC420010	EN	05Z	LMA	\$11,317.06
									05Z Matrix Code	\$71,263.42
										\$153,745.67
Total										\$153,745.67

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
2022	4	2018	6810659	2022 City Planning	20	Matrix Code	\$22,147.79
					20		\$22,147.79
2020	14	1850	6747799	CDBG Administration	21A		\$149.50
2021	2	1927	6747799	CDBG Administration	21A		\$4,948.42
2021	2	1927	6751754	CDBG Administration	21A		\$84.22
2021	2	1927	6810659	CDBG Administration	21A		\$2,006.04
2021	2	1927	6820637	CDBG Administration	21A		\$168.36
2022	1	2016	6747799	2022 CDBG Program Administration	21A		\$1,741.64
2022	1	2016	6751754	2022 CDBG Program Administration	21A		\$25,056.57



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 CDBG-CV FUNDS AWARDED	1,552,939.00

PART II: SUMMARY OF CDBG-CV EXPENDITURES

05 DISBURSEMENTS OTHER THAN SECTION 108 REPAYMENTS AND PLANNING/ADMINISTRATION	1,010,468.45
06 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	443.64
07 DISBURSED IN IDIS FOR SECTION 108 REPAYMENTS	0.00
08 TOTAL EXPENDITURES (SUM, LINES 05 - 07)	1,010,912.09
09 UNEXPENDED BALANCE (LINE 04 - LINE8)	542,026.91

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	1,010,468.45
13 TOTAL LOW/MOD CREDIT (SUM, LINES 10 - 12)	1,010,468.45
14 AMOUNT SUBJECT TO LOW/MOD BENEFIT (LINE 05)	1,010,468.45
15 PERCENT LOW/MOD CREDIT (LINE 13/LINE 14)	100.00%

PART IV: PUBLIC SERVICE (PS) CALCULATIONS

16 DISBURSED IN IDIS FOR PUBLIC SERVICES	727,716.43
17 CDBG-CV GRANT	1,552,939.00
18 PERCENT OF FUNDS DISBURSED FOR PS ACTIVITIES (LINE 16/LINE 17)	46.86%

PART V: PLANNING AND ADMINISTRATION (PA) CAP

19 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	574.23
20 CDBG-CV GRANT	1,552,939.00
21 PERCENT OF FUNDS DISBURSED FOR PA ACTIVITIES (LINE 19/LINE 20)	0.04%



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

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

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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
			6648271	City Health Worker for COVID-19 Support	05M	LMA	\$15,285.10
			6670706	City Health Worker for COVID-19 Support	05M	LMA	\$12,712.94
		1948	6578570	Public Service Outreach Specialist (CV - Public Health Services)	05Z	LMA	\$16,737.75
			6617778	Public Service Outreach Specialist (CV - Public Health Services)	05Z	LMA	\$16,737.75
			6670706	Public Service Outreach Specialist (CV - Public Health Services)	05Z	LMA	\$16,737.75
			6717221	Public Service Outreach Specialist (CV - Public Health Services)	05Z	LMA	\$16,786.75
		1995	6617778	Public Health Services - Mobile Hygiene Unit (Year 1)	05M	LMC	\$6,975.00
			6648271	Public Health Services - Mobile Hygiene Unit (Year 1)	05M	LMC	\$8,770.00
			6670706	Public Health Services - Mobile Hygiene Unit (Year 1)	05M	LMC	\$16,225.00
			6689543	Public Health Services - Mobile Hygiene Unit (Year 1)	05M	LMC	\$18,400.00
			6694744	Public Health Services - Mobile Hygiene Unit (Year 1)	05M	LMC	\$9,675.00
			6717221	Public Health Services - Mobile Hygiene Unit (Year 1)	05M	LMC	\$4,955.00
		2032	6717221	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$12,945.00
			6747799	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$8,530.00
			6751754	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$14,700.00
			6810659	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$29,730.48
			6820637	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$636.11
			6824593	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$20,025.00
			6829017	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$11,403.00
			6831521	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$580.00
			6858373	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$26,455.00
			6873106	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$15,794.00
		2063	6858373	Emergency Overnight and Drop-In Day Shelter Program (COVID-19)	03T	LMC	\$41,931.34
			6873106	Emergency Overnight and Drop-In Day Shelter Program (COVID-19)	03T	LMC	\$24,772.74
	6	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
			6648271	740 S Lime Street	14A	LMH	\$2,435.00



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Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2020	7	1974	6601348	608 S Ann Street	14A	LMH	\$7,600.00
			6648271	608 S Ann Street	14A	LMH	\$8,700.00
		1976	6601348	644 East End Avenue	14A	LMH	\$4,300.00
		1977	6601348	45 W Farnum Street	14A	LMH	\$8,500.00
			6648271	45 W Farnum Street	14A	LMH	\$1,760.00
		1982	6601348	736 St Joseph Street	14A	LMH	\$7,199.70
			6617778	736 St Joseph Street	14A	LMH	\$783.30
			6648271	736 St Joseph Street	14A	LMH	\$4,260.00
		1983	6601348	144 N Broad Street	14A	LMH	\$6,000.00
			6617778	144 N Broad Street	14A	LMH	\$6,972.30
			6648271	144 N Broad Street	14A	LMH	\$774.70
		1984	6601348	643 E Chestnut Street	14A	LMH	\$24,290.00
			6617778	643 E Chestnut Street	14A	LMH	\$485.00
		1987	6617778	681 Poplar Street	14A	LMH	\$2,395.00
		1988	6617778	638 S Lime Street	14A	LMH	\$8,400.00
		1990	6648271	41 S Pearl Street	14A	LMH	\$22,986.00
		1991	6617778	433 Green Street	14A	LMH	\$752.55
			6670706	433 Green Street	14A	LMH	\$15,799.00
	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
			6617778	Building Codes Support for COVID-19 Response	15	LMA	\$2,586.20
			6648271	Building Codes Support for COVID-19 Response	15	LMA	\$2,957.06
			6670706	Building Codes Support for COVID-19 Response	15	LMA	\$4,345.36
			6736094	Building Codes Support for COVID-19 Response	15	LMA	\$1,005.20
Total							\$1,119,421.53

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
			6648271	City Health Worker for COVID-19 Support	05M	LMA	\$15,285.10
			6670706	City Health Worker for COVID-19 Support	05M	LMA	\$12,712.94
		1948	6578570	Public Service Outreach Specialist (CV - Public Health Services)	05Z	LMA	\$16,737.75
			6617778	Public Service Outreach Specialist (CV - Public Health Services)	05Z	LMA	\$16,737.75
			6670706	Public Service Outreach Specialist (CV - Public Health Services)	05Z	LMA	\$16,737.75
			6717221	Public Service Outreach Specialist (CV - Public Health Services)	05Z	LMA	\$16,786.75
		1995	6617778	Public Health Services - Mobile Hygiene Unit (Year 1)	05M	LMC	\$6,975.00
			6648271	Public Health Services - Mobile Hygiene Unit (Year 1)	05M	LMC	\$8,770.00
			6670706	Public Health Services - Mobile Hygiene Unit (Year 1)	05M	LMC	\$16,225.00
			6689543	Public Health Services - Mobile Hygiene Unit (Year 1)	05M	LMC	\$18,400.00
			6694744	Public Health Services - Mobile Hygiene Unit (Year 1)	05M	LMC	\$9,675.00
			6717221	Public Health Services - Mobile Hygiene Unit (Year 1)	05M	LMC	\$4,955.00
		2032	6717221	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$12,945.00
			6747799	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$8,530.00
			6751754	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$14,700.00

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Plan IDIS Year Project	Project Title and Description		Program	Project Estimate	Committed Amount	Amount Drawn Thru Report Year
2023 1	2023 CDBG Program Administration	This project will cover the direct and indirect administrative costs of administering the CDBG program. Costs include salaries, fringes, space rental, audit costs, office supplies, and other direct and indirect administrative program delivery costs.	CDBG	\$0.00	\$234,235.00	\$0.00
2	Fair Housing Services Program	In 2023, the City of Lancaster will continue to support the Fair Housing Services Program. This program receives CDBG Administrative funds to address impediments identified in the 2021 Analysis of Impediments to Fair Housing Choice. 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 will be 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 2023 CDBG dollars will be committed to help fund this program from July 1, 2023 to June 30, 2024. Through this project, Tenfold's Housing Rights and Resources Center (HRRC) will further Lancaster's fair housing provision by providing education, mediation, outreach efforts, and support services to landlords and tenants in relation to Fair Housing law and landlord/tenant issues to eliminate barriers to fair housing opportunities in the area. This activity is being administered as a planning and administrative action pursuant to 24 CFR 570.206(c).	CDBG	\$20,000.00	\$20,000.00	\$3,749.94

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Plan IDIS Year Project	Project Title and Description		Program	Amount Available to Draw	Amount Drawn in Report Year
2023 1	2023 CDBG Program Administration	This project will cover the direct and indirect administrative costs of administering the CDBG program. Costs include salaries, fringes, space rental, audit costs, office supplies, and other direct and indirect administrative program delivery costs.	CDBG	\$234,235.00	\$0.00
2	Fair Housing Services Program	In 2023, the City of Lancaster will continue to support the Fair Housing Services Program. This program receives CDBG Administrative funds to address impediments identified in the 2021 Analysis of Impediments to Fair Housing Choice. 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 will be 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 2023 CDBG dollars will be committed to help fund this program from July 1, 2023 to June 30, 2024. Through this project, Tenfold's Housing Rights and Resources Center (HRRC) will further Lancaster's fair housing provision by providing education, mediation, outreach efforts, and support services to landlords and tenants in relation to Fair Housing law and landlord/tenant issues to eliminate barriers to fair housing opportunities in the area. This activity is being administered as a planning and administrative action pursuant to 24 CFR 570.206(c).	CDBG	\$16,250.06	\$3,749.94

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Plan IDIS Year Project	Project Title and Description	Program	Project Estimate	Committed Amount	Amount Drawn Thru Report Year
2023 3	Critical Repair and Lead Hazard Reduction Program Administration	CDBG	\$215,000.00	\$210,000.00	\$1,578.89
	<p>This project will help cover administrative costs of the City Lead Hazard Control Program and Critical Repair Program in 2023.</p> <p>The City's Lead Hazard Control Program provides risk assessments and financial assistance to income-qualified homeowners for the purpose of reducing or eliminating lead hazards. The work performed is determined by the results of the Risk Assessment and may include repairs to items such as doors, windows, and floors. Licensed and certified contractors will use interim controls and abatement methods when performing the work. The program does not make the property lead-free, instead the property will be considered lead safe. The City of Lancaster will successfully make 435 housing units lead-safe over a 60-month period. The Healthy Homes Supplemental Funding also enables the City to address other health hazards; such as radon, mold, and tripping hazards; in a targeted 120 homes.</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. Financial assistance provided to very-low and low-income residents will be provided in the form of a grant. Often times, eligible properties are identified through the Lead Hazard Reduction Program applicants. Bureau of Lead Safety and Community Development staff and/or a City Inspector inspect each property to determine the severity. Types of repairs may include: water heaters, broken sewer pipes, non-operable furnaces, roof repair/replacement, structural problems, plumbing and/or, electrical.</p>				

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2023 3	Critical Repair and Lead Hazard Reduction Program Administration	CDBG	\$208,421.11	\$1,578.89
	<p>This project will help cover administrative costs of the City Lead Hazard Control Program and Critical Repair Program in 2023.</p> <p>The City's Lead Hazard Control Program provides risk assessments and financial assistance to income-qualified homeowners for the purpose of reducing or eliminating lead hazards. The work performed is determined by the results of the Risk Assessment and may include repairs to items such as doors, windows, and floors. Licensed and certified contractors will use interim controls and abatement methods when performing the work. The program does not make the property lead-free, instead the property will be considered lead safe. The City of Lancaster will successfully make 435 housing units lead-safe over a 60-month period. The Healthy Homes Supplemental Funding also enables the City to address other health hazards; such as radon, mold, and tripping hazards; in a targeted 120 homes.</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. Financial assistance provided to very-low and low-income residents will be provided in the form of a grant. Often times, eligible properties are identified through the Lead Hazard Reduction Program applicants. Bureau of Lead Safety and Community Development staff and/or a City Inspector inspect each property to determine the severity. Types of repairs may include: water heaters, broken sewer pipes, non-operable furnaces, roof repair/replacement, structural problems, plumbing and/or, electrical.</p>			

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Plan IDIS Year Project	Project Title and Description		Program	Project Estimate	Committed Amount	Amount Drawn Thru Report Year
2023 4	City Planning	The purpose of this project is to support the City in conducting planning activities which may consist of data gathering, studies, analysis, and preparation of plans and the identification of actions that will implement resultant plans in accordance with 24 CFR 570.205.	CDBG	\$50,000.00	\$50,000.00	\$0.00
5	Critical Repair Program	In 2023, the City will continue to provide CDBG funding to support its Critical Repair Program. 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. Financial assistance offered to very-low and low-income residents will be provided in the form of a grant. Often times, eligible properties are identified through the Lead Hazard Reduction Program applicants. Bureau of Lead Safety and Community Development staff and/or a City Inspector will inspect each property to determine the seriousness and provide advisement regarding the critical repairs necessary to rectify health and safety concerns. All repairs need to be deemed as an emergency by the inspector. Types of repairs may include but are not limited to: water heaters, broken sewer pipes, non-operable furnaces, roof repair/replacement, structural problems, plumbing and/or, electrical repairs.	CDBG	\$125,000.00	\$125,000.00	\$12,717.00

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Plan IDIS Year Project	Project Title and Description		Program	Amount Available to Draw	Amount Drawn in Report Year
2023 4	City Planning	The purpose of this project is to support the City in conducting planning activities which may consist of data gathering, studies, analysis, and preparation of plans and the identification of actions that will implement resultant plans in accordance with 24 CFR 570.205.	CDBG	\$50,000.00	\$0.00
5	Critical Repair Program	In 2023, the City will continue to provide CDBG funding to support its Critical Repair Program. 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. Financial assistance offered to very-low and low-income residents will be provided in the form of a grant. Often times, eligible properties are identified through the Lead Hazard Reduction Program applicants. Bureau of Lead Safety and Community Development staff and/or a City Inspector will inspect each property to determine the seriousness and provide advisement regarding the critical repairs necessary to rectify health and safety concerns. All repairs need to be deemed as an emergency by the inspector. Types of repairs may include but are not limited to: water heaters, broken sewer pipes, non-operable furnaces, roof repair/replacement, structural problems, plumbing and/or, electrical repairs.	CDBG	\$112,283.00	\$12,717.00

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Plan IDIS Year Project	Project Title and Description		Program	Project Estimate	Committed Amount	Amount Drawn Thru Report Year
2023 6	Proactive Housing Code Enforcement	The Proactive 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 through proactive systematic and complaint-based code enforcement actions. The City has committed \$355,576 of its 2023 CDBG dollars to help fund this program which will also leverage City general fund dollars, allowing this activity to continue to operate proactively to address the City's critical health-related housing issues. In 2023, this service will contribute to the preservation and improve the quality of affordable housing with a focus on homes in low and very-low-income census tracts in some of City's income-constrained areas such as Census Tracts 9, 8, 10, 14, and 147.	CDBG	\$355,576.00	\$367,051.17	\$182,382.77
7	Affordable Housing Development Solutions	The City is prioritizing increasing affordable housing for its community members leveraging all resources available. The City has allocated \$163,551 in CDBG entitlement funding to use for furthering this effort in 2023, which will help supplement \$163,551 in remaining 2022 CDBG entitlement funding allocated to this project to help strengthen impact. In 2023, the City plans on utilizing a competitive process seeking eligible affordable housing development projects that may include activities such as construction of new housing, homeownership assistance, and acquisition and/or rehab of existing housing, for the purposes of increasing affordable housing opportunities for low- and moderate-income residents.	CDBG	\$163,551.00	\$0.00	\$0.00

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Plan IDIS Year Project	Project Title and Description		Program	Amount Available to Draw	Amount Drawn in Report Year
2023 6	Proactive Housing Code Enforcement	The Proactive 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 through proactive systematic and complaint-based code enforcement actions. The City has committed \$355,576 of its 2023 CDBG dollars to help fund this program which will also leverage City general fund dollars, allowing this activity to continue to operate proactively to address the City's critical health-related housing issues. In 2023, this service will contribute to the preservation and improve the quality of affordable housing with a focus on homes in low and very-low-income census tracts in some of City's income-constrained areas such as Census Tracts 9, 8, 10, 14, and 147.	CDBG	\$184,668.40	\$182,382.77
7	Affordable Housing Development Solutions	The City is prioritizing increasing affordable housing for its community members leveraging all resources available. The City has allocated \$163,551 in CDBG entitlement funding to use for furthering this effort in 2023, which will help supplement \$163,551 in remaining 2022 CDBG entitlement funding allocated to this project to help strengthen impact. In 2023, the City plans on utilizing a competitive process seeking eligible affordable housing development projects that may include activities such as construction of new housing, homeownership assistance, and acquisition and/or rehab of existing housing, for the purposes of increasing affordable housing opportunities for low- and moderate-income residents.	CDBG	\$0.00	\$0.00

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Plan IDIS Year Project	Project Title and Description		Program	Project Estimate	Committed Amount	Amount Drawn Thru Report Year
2023 8	Place-based Streetscape Improvements	In 2023, CDBG entitlement funding will be allocated to support the City's Place-Based Streetscape Improvement Program which 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.	CDBG	\$210,000.00	\$210,000.00	\$198,056.25
9	Public Service City Program Management (Formerly Project Manager)	This project is designed to support the Department of Neighborhood Engagement (DoNE) in their efforts to improve the quality of life for our community through collaboration and the development of well-rounded, resident-lead strategies and increased collaboration between the community and City government through providing financial assistance supporting eligible DoNE program management work. The purpose of this activity is to provide project management support for the City's core neighborhood engagement initiatives and activities in order to promote and enhance neighborhood quality of life.	CDBG	\$80,000.00	\$80,000.00	\$0.00

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Plan IDIS Year Project	Project Title and Description		Program	Amount Available to Draw	Amount Drawn in Report Year
2023 8	Place-based Streetscape Improvements	In 2023, CDBG entitlement funding will be allocated to support the City's Place-Based Streetscape Improvement Program which 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.	CDBG	\$11,943.75	\$198,056.25
9	Public Service City Program Management (Formerly Project Manager)	This project is designed to support the Department of Neighborhood Engagement (DoNE) in their efforts to improve the quality of life for our community through collaboration and the development of well-rounded, resident-lead strategies and increased collaboration between the community and City government through providing financial assistance supporting eligible DoNE program management work. The purpose of this activity is to provide project management support for the City's core neighborhood engagement initiatives and activities in order to promote and enhance neighborhood quality of life.	CDBG	\$80,000.00	\$0.00

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IDIS

Plan IDIS Year Project	Project Title and Description		Program	Project Estimate	Committed Amount	Amount Drawn Thru Report Year
2023 10	Police Social Worker Program	In 2023, the City will continue to leverage 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 program will work to resolve 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. Due to current spending trends impacted by an unforeseen reduction in staffing levels, the City has determined to commit \$1,000 in 2023 CDBG funding to this program to allow sufficient time for the activity to fully expend its remaining FY2021 and full FY2022 allocations.	CDBG	\$1,000.00	\$1,000.00	\$0.00

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IDIS

Plan IDIS Year Project	Project Title and Description		Program	Amount Available to Draw	Amount Drawn in Report Year
2023 10	Police Social Worker Program	In 2023, the City will continue to leverage 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 program will work to resolve 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. Due to current spending trends impacted by an unforeseen reduction in staffing levels, the City has determined to commit \$1,000 in 2023 CDBG funding to this program to allow sufficient time for the activity to fully expend its remaining FY2021 and full FY2022 allocations.	CDBG	\$1,000.00	\$0.00

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Plan IDIS Year Project	Project Title and Description		Program	Project Estimate	Committed Amount	Amount Drawn Thru Report Year
2023 11	Health and Housing Social Worker Program	The Health and 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 health and wellbeing. In 2023, the Health and Housing Social Worker will continue to assist City-clientele in resolving persistent housing-related issues and in finding and securing affordable housing opportunities in the City while also addressing intersecting health issues impacting housing. This program acts as a liaison between the City and the various social service agencies by providing follow-up and case monitoring 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.	CDBG	\$75,000.00	\$75,000.00	\$37,596.80

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Plan IDIS Year Project	Project Title and Description	Program	Amount Available to Draw	Amount Drawn in Report Year
2023 11	Health and Housing Social Worker Program	CDBG	\$37,403.20	\$37,596.80
	<p>The Health and 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 health and wellbeing. In 2023, the Health and Housing Social Worker will continue to assist City-clientele in resolving persistent housing-related issues and in finding and securing affordable housing opportunities in the City while also addressing intersecting health issues impacting housing. This program acts as a liaison between the City and the various social service agencies by providing follow-up and case monitoring 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.</p>			

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Plan ID	IS Year	Project Title and Description	Program	Project Estimate	Committed Amount	Amount Drawn Thru Report Year	
2023	12	Small Business Development (Microenterprise Development)	In 2023, the Small Business Development Activity will offer 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 through ASSETS Lancaster. Participants will 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 will be eligible to apply for microenterprise loans and financial assistance through various local and State-supported funding mechanisms. All attendees will receive continuous technical assistance and support after training completion. This purpose of this program is to improve the economic development support and outcomes for low- and very-low-income persons seeking to start or expand small businesses in the City of Lancaster.	CDBG	\$20,000.00	\$20,000.00	\$0.00

U.S. DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT
OFFICE OF COMMUNITY PLANNING AND DEVELOPMENT
PR06 - Summary of Consolidated Plan Projects for Report
Year

DATE: 3/11/2024
TIME: 2:24:56 PM
PAGE: 16/16

IDIS

Plan ID	IS Year	Project Title and Description	Program	Amount Available to Draw	Amount Drawn in Report Year	
2023	12	Small Business Development (Microenterprise Development)	In 2023, the Small Business Development Activity will offer 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 through ASSETS Lancaster. Participants will 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 will be eligible to apply for microenterprise loans and financial assistance through various local and State-supported funding mechanisms. All attendees will receive continuous technical assistance and support after training completion. This purpose of this program is to improve the economic development support and outcomes for low- and very-low-income persons seeking to start or expand small businesses in the City of Lancaster.	CDBG	\$20,000.00	\$0.00

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

Account: 218465	Ad ID: 4648058
Client Type: LT	Description: PUBLIC MEETING Notice of a Public Me
Name:	Run Dates: 03/12/24 to 03/12/24
Company: CITY OF LANCASTER	Class: 107
Address: COMMUNITY PLANNING ECONOMIC DEVELOPMENT	Orig User: KMCKILLIPS
120 N DUKE ST, PO BOX 1599	Lines: 62
LANCASTER, PA 17608-1599	Agate Lines: 111
	Inserts: 1

Other Charges:	\$63.00	Gross:	\$370.52
Discount:	\$0.00		
Surcharge:	\$0.00	Paid Amount:	- \$0.00
Credits:	\$0.00		
Bill Depth:	7.958	Amount Due:	\$370.52

Notes: 3/12

**PUBLIC MEETING
Notice of a Public
Meeting for the City of
Lancaster's
2023 Consolidated
Annual Performance
and Evaluation Report
(CAPER)**

**The Public Meeting will
take place at 12:30 PM
on Thursday, March 21,
2024 in
Council Chambers at
City Hall, 120 North
Duke Street, Lancaster,
PA 17602**

The purpose of this Public Notice is to announce that the City of Lancaster will be hosting a PUBLIC MEETING to review its 2023 Consolidated Annual Performance Evaluation Report to facilitate public awareness and education on the City's Department of Housing and Urban Development (HUD)-assisted programs and processes. The CAPER reviews the accomplishments of the City's Community Development Block Grant (CDBG) programming during the 2023 Program Year.

A copy of the 2023 CAPER can be found on the City's website here: <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 & Resources" tab.

The City welcomes all interested citizens residing in the City of Lancaster to attend this public meeting.

If you are a person who is mobility impaired or have language access needs, please contact Brynn McGowan by email at bmcgowan@cityoflanasterpa.gov or telephone at (717) 291-4708 for special accommodations.

Danene Sorace
Mayor

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City of Lancaster, Pennsylvania
 Department of Economic and Community Development

CITIZEN PARTICIPATION PLAN

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

Encompassing the
 Community Development Block Grant (CDBG) Program
 Emergency Solutions Grant (ESG) Program

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

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

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

the appropriate accommodations can be arranged. A voice phone number (291-4743), the City's TDD number (TDD 291-4761), and an email address are also provided in meeting advertisements.

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

CITIZEN PARTICIPATION PLAN – REQUIRED ELEMENTS

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

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

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

Phase One: Release of Funding Applications

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

Phase Two: Review Panel for Funding of Applications

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

1. MEETINGS WITH THE MAYOR

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

2. ANNUAL ACTION PLAN ADVERTISEMENT AND COMMENT PERIOD

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

3. ANNUAL PLAN ADVERTISEMENT & PUBLIC HEARING PRESENTATION

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

4. OFFICIAL ADOPTION OF THE PLAN

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

5. SUBMISSION OF THE PLAN TO HUD

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

6. IMPLEMENTATION

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

B. Program Amendments

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

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

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

C. Performance

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

The CAPER is a document produced annually by the City in narrative form and through the automated, "Integrated Disbursement and Information System" (IDIS) which provides a systematic format for reporting to HUD on the use of CDBG funds. The CAPER is also used to provide information to the citizens and officials of Lancaster City. In addition, it is part of HUD's review of CDBG Program grantees and Congress's review of the national CDBG Entitlement Program. Lancaster City must submit its Consolidated Annual Performance and Evaluation Report to HUD each year by the end of September (within 90 days after the close of the CDBG Year each December 31). However, before submitting the CAPER to HUD, availability of the Report for public review and comment must be made known to City residents. Copies must be made accessible to City residents in sufficient time to permit them to review and comment on the Report prior to its submission to HUD.

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

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

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

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

E. Emergency Solutions Grant (ESG) Application

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

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

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

Comments or Complaints Regarding the Consolidated Grant Program

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

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

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

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

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

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

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

The City will make available translation services for Spanish-speaking residents at the public meeting where views on neighborhood and City-wide needs are expressed. The City can provide translation services for Spanish-speaking residents who come into the Municipal Building to obtain program information.

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

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

a contact person) which is attached to every Program Project Funding Application Form. In addition, the City serves as a conduit for City-based organizations seeking other Federal or State grants to undertake projects addressing the Economic and Community Development needs of Lancaster City. These funds complement the funds received by the City through the Community Development Block Grant Program.

Exhibit One

City of Lancaster, Pennsylvania

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

UNDERSTANDING LANCASTER'S 'CONSOLIDATED PLAN'

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

A primary source of Federal funds for State and local governments (including the City of Lancaster) is the Department of Housing and Urban Development (HUD). Major HUD formula grant Programs include (1) the Community Development Block Grant (CDBG) Program, (2) HOME Investment Partnership (HOME) Program, (3) Emergency Shelter Grant (ESG) Program, and (4) the Housing Opportunities for Persons With AIDS (HOPWA) Program. The City of Lancaster receives funds through the CDBG directly from HUD. HOME funds are received jointly with the Lancaster County Housing and Redevelopment Authority (LCHRA) as the City and County are operating under a limited consortium for the HOME Program. The County is responsible for the submission of the 5-year Consolidated Plan, as well as the submission of the Annual Action Plan as it relates to the HOME Program. The City creates and submits a separate Annual Action Plan for the CDBG Program. The City receives ESG Program Funds from the Pennsylvania Department of Community and Economic Development, through a competitive application process.

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

The Consolidated Plan, a comprehensive planning document, will replace several separate documents now submitted to HUD by the City, including (1) the Comprehensive Housing Affordability Strategy (CHAS), (2) HOME Program Application, (3) Emergency Shelter Grant Program Description, and (4) CDBG Final Statement. The Consolidated Plan will be a document submitted annually to HUD by Lancaster that serves as the City's single planning document and application document for HUD funding under the CDBG, HOME, and ESG Programs. The City's Plan will cover the period from January 1 to December 31.

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

Goal One: Provide Decent Housing

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

Goal Two: Provide a Suitable Living Environment

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

Goal Three: Expand Economic Opportunities

- Create jobs accessible to low/moderate-income persons
- Provide access to credit for community development that promotes long-term economic and social viability

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

The joint Lancaster City and County five-year Consolidated Plan will create a unified strategy for community development and revitalization and promote partnerships among local institutions, nonprofit organizations, developers, community leaders, citizens and City officials. The process to develop the Plan will enable the City to bring together its needs and resources to develop and coordinate effective housing and community development activities. The five-year Consolidated Plan for Lancaster will contain a strategic plan which brings the needs and resources identified together into a unified, coordinated planning/ submission document. To develop a unified strategy, the City (with the assistance of citizens and community agencies) will undergo a comprehensive housing and community development self-analysis. As part of this analysis, the City will (1) inventory all of its resources, (2) identify its priority needs, (3) establish its housing and community development objectives, and (4) develop a coordinated strategy to achieve its objectives and resolve priority needs.

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

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

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

Consultation with other organizations will also be an important aspect of Consolidated Plan formulation. The City will confer with public and private agencies that provide assisted housing, health services, and social services during the preparation of the Plan. Consultation will also occur with the Lancaster City Housing Authority concerning public housing needs and the Authority's planned Comprehensive Grant Program activities. In addition, the City will consult with adjacent units of government, particularly for problems and solutions that may go beyond a single jurisdiction.

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

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

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

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

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

Lancaster's Action Plan must be reviewed and approved by HUD within 45 days of submission by the City. The Plan will be submitted to HUD by the City on November 15. The new Program Year will begin on January 1 and end December 31.

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

Legal Notice

Notice of CDBG Program Amendment Criteria

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

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

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

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

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

Account: 218465	Ad ID: 4648057
Client Type: LT	Description: PUBLIC NOTICE Notice of a Public Rev
Name:	Run Dates: 03/12/24 to 03/12/24
Company: CITY OF LANCASTER	Class: 107
Address: COMMUNITY PLANNING ECONOMIC DEVELOPMENT	Orig User: KMCKILLIPS
120 N DUKE ST, PO BOX 1599	Lines: 63
LANCASTER, PA 17608-1599	Agate Lines: 113
	Inserts: 1

Other Charges:	\$48.00	Gross:	\$360.48
Discount:	\$0.00		
Surcharge:	\$0.00	Paid Amount:	- \$0.00
Credits:	\$0.00		
Bill Depth:	8.097	Amount Due:	\$360.48

Notes: 3/12

**PUBLIC NOTICE
Notice of a Public
Review and Comment
Period for Lancaster
City's
Draft 2023
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 2023 under the Federal Community Development Block Grant (CDBG) Program.

A copy of the 2023 CAPER is available on the City's website at <https://www.city-oflanasterpa.com/departments/departments-of-community-planning-economic-development/health-housing-community-development-division/bureau-of-lead-safety-community-development/> under the "Documents & Resources" tab and at City Hall, 120 North Duke Street, Lancaster, PA 17602.

The City will accept citizen comments regarding the CAPER for at 16 days (from March 12 to March 27, 2024). 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
Email: bmcgowan@city-oflanasterpa.gov

If you are a person who is mobility impaired or have language access needs, please contact Brynn McGowan using the contact information listed above for special accommodations.
Danene Sorace
Mayor

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City of Lancaster U.S. Census Bureau Demographic Information (2021 Inflation Adjusted Dollars)

INCOME AND BENEFITS			
	Count	Percent	Margin of Error
Total Households	21,266	21,266	±637
Less than \$10,000	1148	5.4%	±1.6
\$10,000 to \$14,999	1318	6.2%	±1.2
\$15,000 to \$24,999	2020	9.5%	±1.7
\$25,000 to \$34,999	2488	11.7%	±1.5
\$35,000 to \$49,999	3020	14.2%	±1.6
\$50,000 to \$74,999	4126	19.4%	±1.7
\$75,000 to \$99,999	2999	14.1%	±1.6
\$100,000 to \$149,999	2786	13.10%	±1.3
\$150,000 to \$199,999	829	3.90%	±0.8
\$200,000 or more	510	2.40%	±0.5
Income and Benefits - Median Household Income (dollars)	\$ 54,145	± \$	3,583
Income and Benefits - Mean Household Income (dollars)	\$ 67,836	± \$	4,073

SOURCE OF INCOME AND BENEFITS	
With earnings (Percentage of Population)	84.20%
Mean earnings (dollars)	\$ 67,597.00
With Social Security (Percentage of Population)	24.50%
Mean Social Security income (dollars)	\$ 17,280.00
With retirement income (Percentage of Population)	12.30%
Mean retirement income (dollars)	\$ 16,136.00
With Supplemental Security Income (Percentage of Population)	10.40%
Mean Supplemental Security Income (dollars)	\$ 10,405.00
With cash public assistance income (Percentage of Population)	7.80%
Mean cash public assistance income (dollars)	\$ 3,487.00

City of Lancaster U.S. Census Bureau Demographic Information (2021 Inflation Adjusted Dollars)

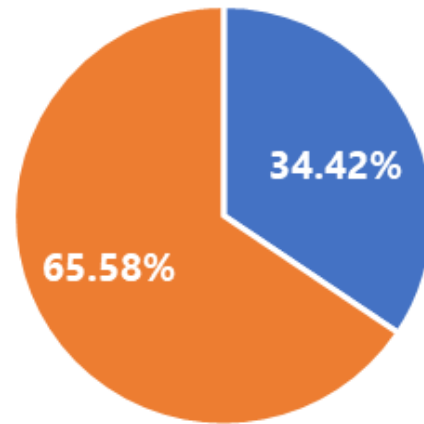
EMPLOYMENT STATUS			
	<i>Count</i>	<i>Percent</i>	<i>Margin of Error</i>
Population 16 years and over	46285	100%	X
Total Population in Labor Force	31631	68.3%	±982
Employed	29407	63.5%	±1,047
Unemployed	2213 	4.8%	±411

HEALTH INSURANCE		
	<i>Percent</i>	<i>Margin of Error</i>
<u>Employed:</u>		
With health insurance coverage	90.20%	±1.6
No health insurance coverage	9.80%	±1.6
<u>Unemployed:</u>		
With health insurance coverage	80.70%	±7.7
No health insurance coverage	19.30%	±7.7
<u>Not in labor force:</u>		
With health insurance coverage	92.90%	±2.2
No health insurance coverage	7.10%	±2.2

PERCENTAGE OF FAMILIES AND PEOPLE WHOSE INCOME IN THE PAST 12 MONTHS IS BELOW THE POVERTY LEVEL		
	<i>Percent</i>	<i>Margin of Error</i>
All Families	15.10%	±2.8%
With related children of the householder under 18 years	19.00%	±3.7%
Married couple families	3.90%	±1.9%
Families with female householder, no spouse present	8.30%	±3.2%

Housing Cost Burden - City of Lancaster, PA

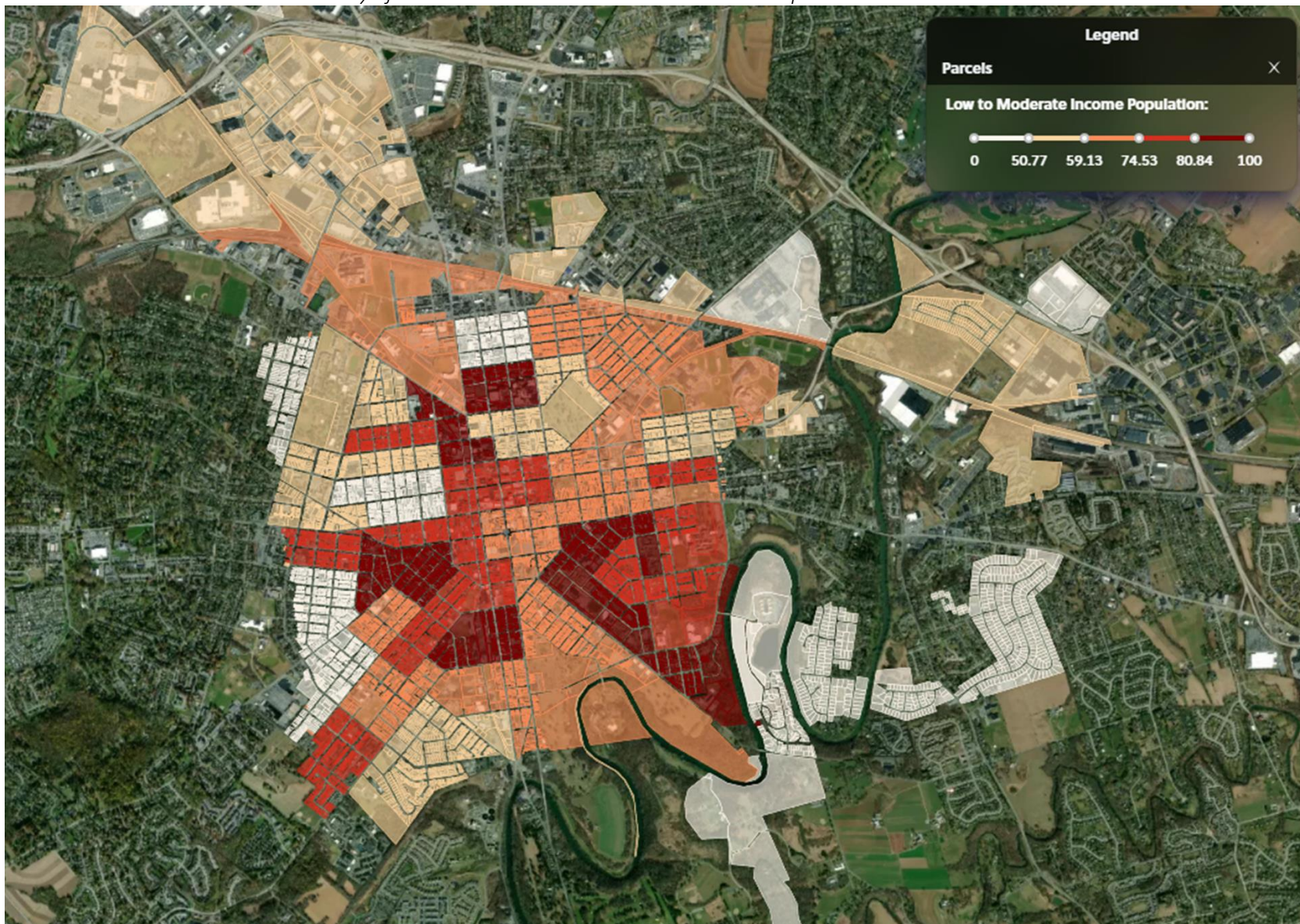
(U.S. Census Bureau, 2021 American Community Survey)



- 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)

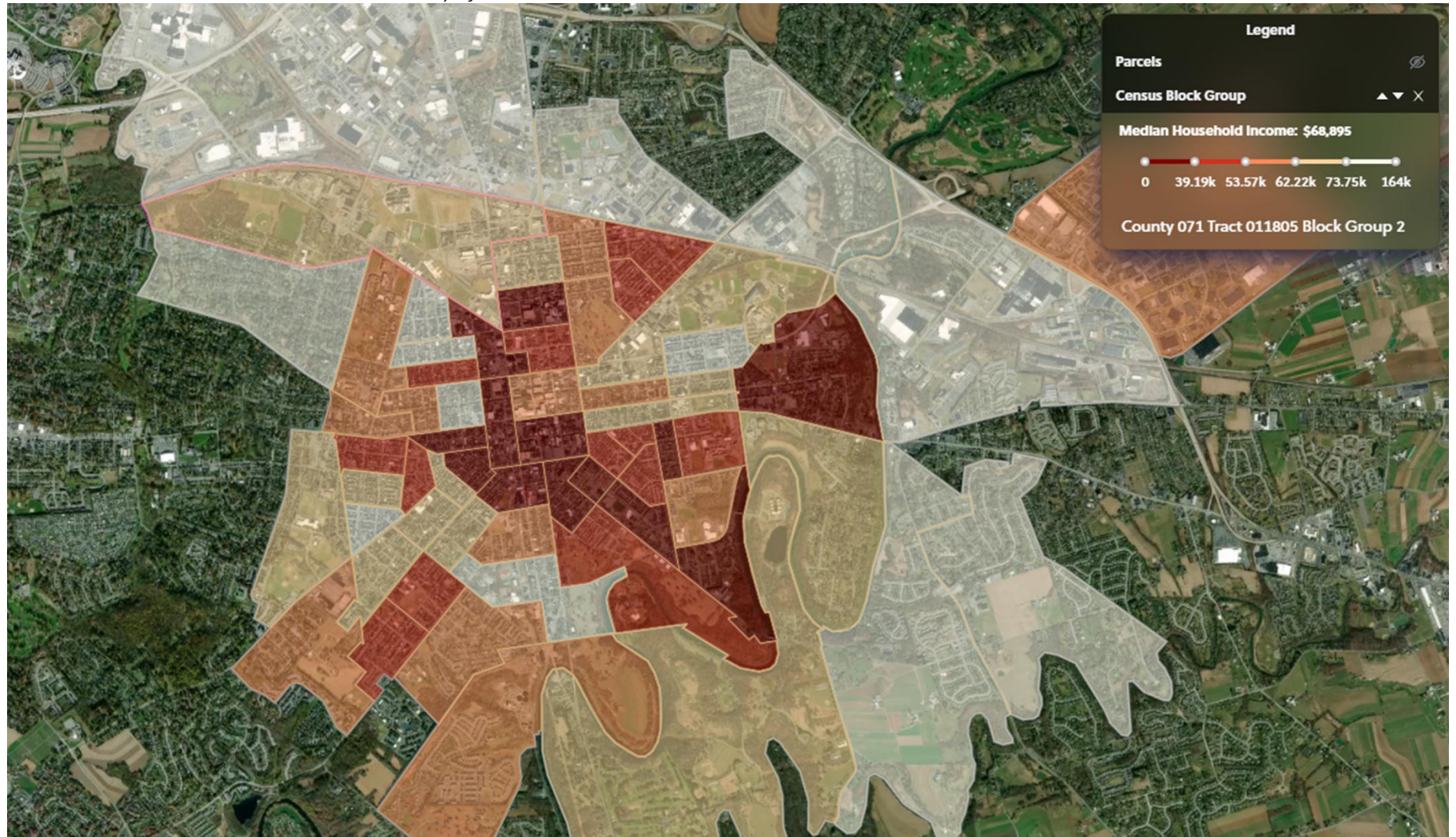
City of Lancaster U.S. Census Bureau Demographic Information (2021 Inflation Adjusted Dollars)

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



City of Lancaster U.S. Census Bureau Demographic Information (2021 Inflation Adjusted Dollars)

City of Lancaster – Median Household Income Distribution



A black and white photograph of a multi-story urban building. The building has a fire escape on its side and several windows. Power lines are visible in the foreground, crisscrossing the scene. The image is split horizontally, with the top half showing the upper part of the building and the bottom half showing the lower part, including a balcony and a dark, textured wall.

INTERIM HOUSING STRATEGY

OCTOBER 2021

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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.

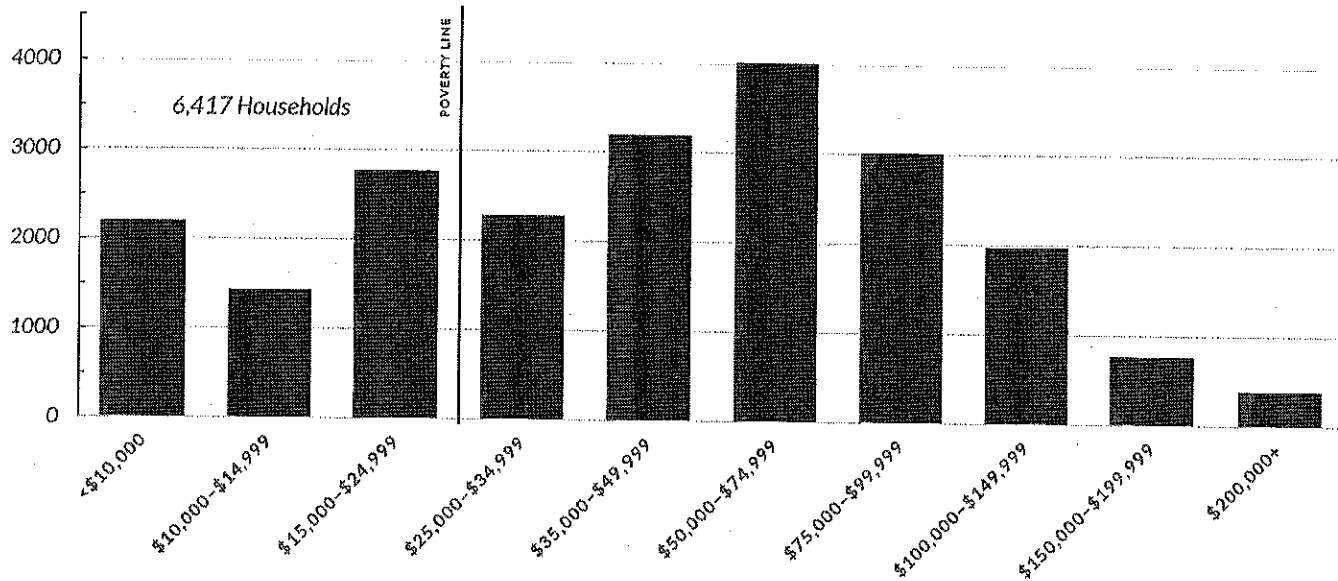
QUANTITATIVE POLICY TARGETS

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*]

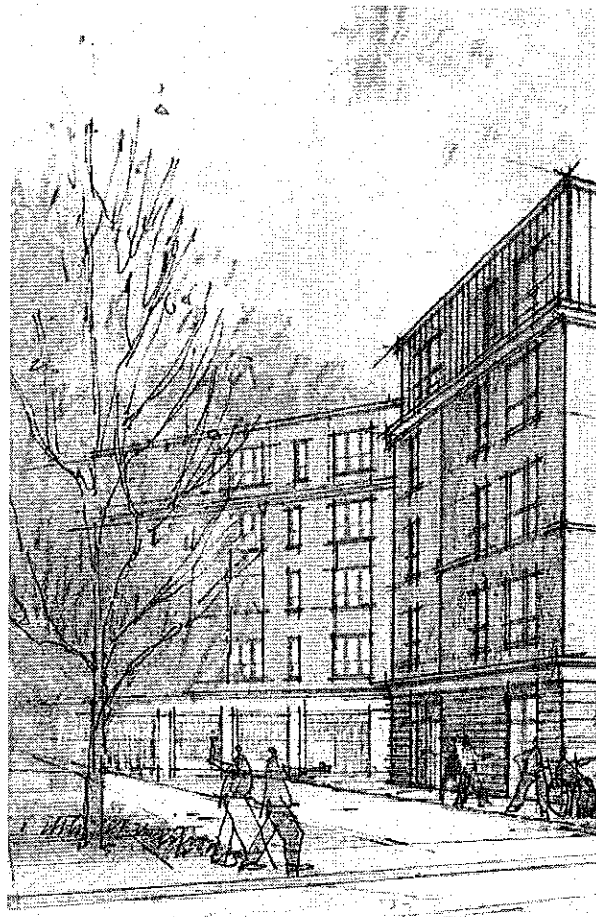
Protect, maintain, and improve the quality of existing housing to help keep households safe and affordable.

- 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.

LEARN MORE ABOUT AFFORDABLE HOUSING IN THE CITY OF LANCASTER

CityOfLancasterPA.com/affordable-housing

DEPARTMENT OF COMMUNITY PLANING &
ECONOMIC DEVELOPMENT
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CITY OF
LANCASTER

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
Spanish	16,457	+/-993	29.9%	+/-1.8
Speak English less than "very well"	6,571	+/-756	11.9%	+/-1.4
Other Indo-European languages	1,585	+/-502	2.9%	+/-0.9
Speak English less than "very well"	731	+/-342	1.3%	+/-0.6
Asian and Pacific Islander languages	1,316	+/-374	2.4%	+/-0.7
Speak English less than "very well"	794	+/-231	1.4%	+/-0.4
Other languages	572	+/-230	1.0%	+/-0.4
Speak English less than "very well"	411	+/-176	0.7%	+/-0.3

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

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

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

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

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

Interview Questions:

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

Who was interviewed:

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

Interview Themes:

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

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

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

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

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

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

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

(4) Resources available and costs to recipients:

Please see main for a description of provided resources.

APPENDIX C – INTERPRETATION DECLINATION FORM

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

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

Signature: _____

Date: _____

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.

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.