

2024

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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Danene Sorace, Mayor

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CR-05 - Goals and Outcomes

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

In 2024, 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	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	351	438.75%	20	165	825.00%
Expand Economic Opportunities	Non-Housing Community Development		Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	100	78	78.00%	10	0	0.00%

Homeless Services	Homeless	ESG: \$728,395.00	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	200	128	64.00%	0	0	0.00%
Homeless Services	Homeless		Homeless Person Overnight Shelter	Persons Assisted	200	135	67.50%	0	0	0.00%
Increase Affordable Housing Opportunities	Affordable Housing	CDBG: \$1,914,243.00	Other ¹	Other	60	8	13.333%	2	2	100.00%
Maintain Affordable, Good Quality Housing	Affordable Housing	CDBG: \$3,577,792.00	Rental units rehabilitated	Household Housing Unit	50	209	418.00%	10	125	1,250.00%
Maintain Affordable, Good Quality Housing	Affordable Housing		Homeowner Housing Rehabilitated	Household Housing Unit	50	157	314.00%	10	44	440.00%
Maintain Affordable, Good Quality	Affordable Housing		Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	3,000	4,002	133.40%	600	656	109.33%

¹ "Other" refers to construction of new housing, housing counseling, homeownership assistance, and acquisition or rehab of existing housing for the purposes of increasing affordable housing that is not already represented in other categories.

Housing										
Promote Neighborhood Quality of Life	Non-Housing Community Development	CDBG: \$2,557,793.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10,000	101,330	1,013.30 %	500	17,190	3,438.00%
Promote Neighborhood Quality of Life	Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10,000	8,252	82.52%	1000	823	82.30%
Promote Neighborhood Quality of Life	Non-Housing Community Development		Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	400	1,832	458.00%	105	422	401.90%

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	142,656	1,133.53%

Table 2 - CDBG-CV 2024 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.

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

The City of Lancaster successfully leveraged CDBG funding in 2024 to address the priorities and objectives identified in our plan, especially those related to affordable housing maintenance and development. We were also successful in exceeding established metrics to promote neighborhood quality of life and support economic opportunities except the accomplishments for activities that have been delayed due to unforeseen programmatic circumstances.

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Goal 1: Maintain Affordable, Good Quality Housing

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. The City committed \$308,510 of its 2024 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 issue. 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 the City's income-constrained areas – Census Tracts 9, 8, 10, 14, and 147. In 2024, this activity brought 656 properties up to code through the resolution of violations in the low-income Service Area, improving the health, safety, and quality of housing in a deteriorating area. Additionally, this activity addressed 72 cases of elevated blood lead levels (EBLL) in children, providing home visits and education in each case.

In 2024, 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 (Note: 17% of all 2024 proactive housing code enforcement resolutions were a result of block walks);
- (3) Successfully integrated Lead Hazard evaluations into our operations to assess and improve the health of housing conditions;
- (4) Contributed to the addition of new affordable rental housing in the area. Of the 656 reported enforcement cases, 27% (or 175) were for new rental units, increasing the number of housing units in low-income census tracts where the need for affordable housing continues to rise.

Critical Repair, Lead Hazard Control, and Program Administration

In 2024, the City leveraged \$306,851 in CDBG dollars to help fund affordable housing preservation and improvement projects in the forms of the Critical Repair and Lead Hazard Control Programs to provide emergency critical repairs and reduce or eliminate lead hazards for low-to-moderate income (LMI) households. In addition, CDBG funding supported the eligible costs of administering these housing rehabilitation programs. 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, non-operable furnaces, roof repair/replacement, and rectification of structural, plumbing, and/or electrical problems.

In 2024, the City used CDBG funding for administrative support to complete 162 projects, making 151 homes lead-safe and providing critical repairs to 9 households (two homes had both critical repair and lead control work). In 2024, 148 LMI families directly benefited from these projects: 36% were extremely-low-income families (<30% Area Median Income [AMI]), 40% were low-income families (30% - 50% AMI), and 34% were moderate-income families (51% - 80% AMI). CDBG dollars also funded an additional 24 projects on vacant rental properties that will ultimately be occupied by LMI households.

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

Affordable Housing Development Solutions

The City's Subgrantees continued to leverage FY2021 and FY2022 CDBG allocations to support scattered site rehabilitation for affordable housing home ownership and rental opportunities for LMI households. Subrecipient Spanish American Civic Association (SACA) Development Corporation completed 2 single-family scattered site rehabilitation projects that were sold to two LMI households. The first property was sold on May 31, 2024 to a single individual at 30-50% AMI. The second property was sold on September 25, 2024 to a family of five at less than 30% AMI.

Additionally, SACA began renovations at 506 Beaver Street, a property they purchased in late 2023. Renovations included stabilizing the property that was structurally damaged by fire. Renovations required a project extension through July 2025. Both CDBG program income funds and CDBG entitlement funds were expended in 2024 for this affordable housing project.

In 2024, the City of Lancaster's Subrecipient, Partners with Purpose, completed four properties for which it received \$163,551 in FY 2022 CDBG funding: (1) 234 Juniata Street, (2) 253 West Walnut Street, (3) 515 Church Street, and (4) 538 St. Joseph Street. Partners with Purpose leveraged their \$163,551 CDBG investment (received in 2023) with an additional \$942,409 in direct rehabilitation funds to provide critical structural repairs and improvements, add essential safety features to each property, and ensure

hazardous materials were safely removed or abated. Upon completion of each unit in 2024, Partners with Purpose rented the units to low-income families to meet an urgent community need for affordable housing need pursuant to 24 CFR 570.208 (a)(3).

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Goal 3: Promote Neighborhood Quality of Life

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 task is accomplished through education, outreach, training, and technical assistance to address impediments identified in the *2021 Analysis of Impediments to Fair Housing Choice* (attached to this document in Appendix 4).

In 2024, the City allocated \$20,000 of its FY 2023 CDBG funds to support this program through its Subrecipient, Tenfold. 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 2024, the HRRC utilized FY2023 CDBG dollars to accomplish the following outcomes:

- Completed 142 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; and
- 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.

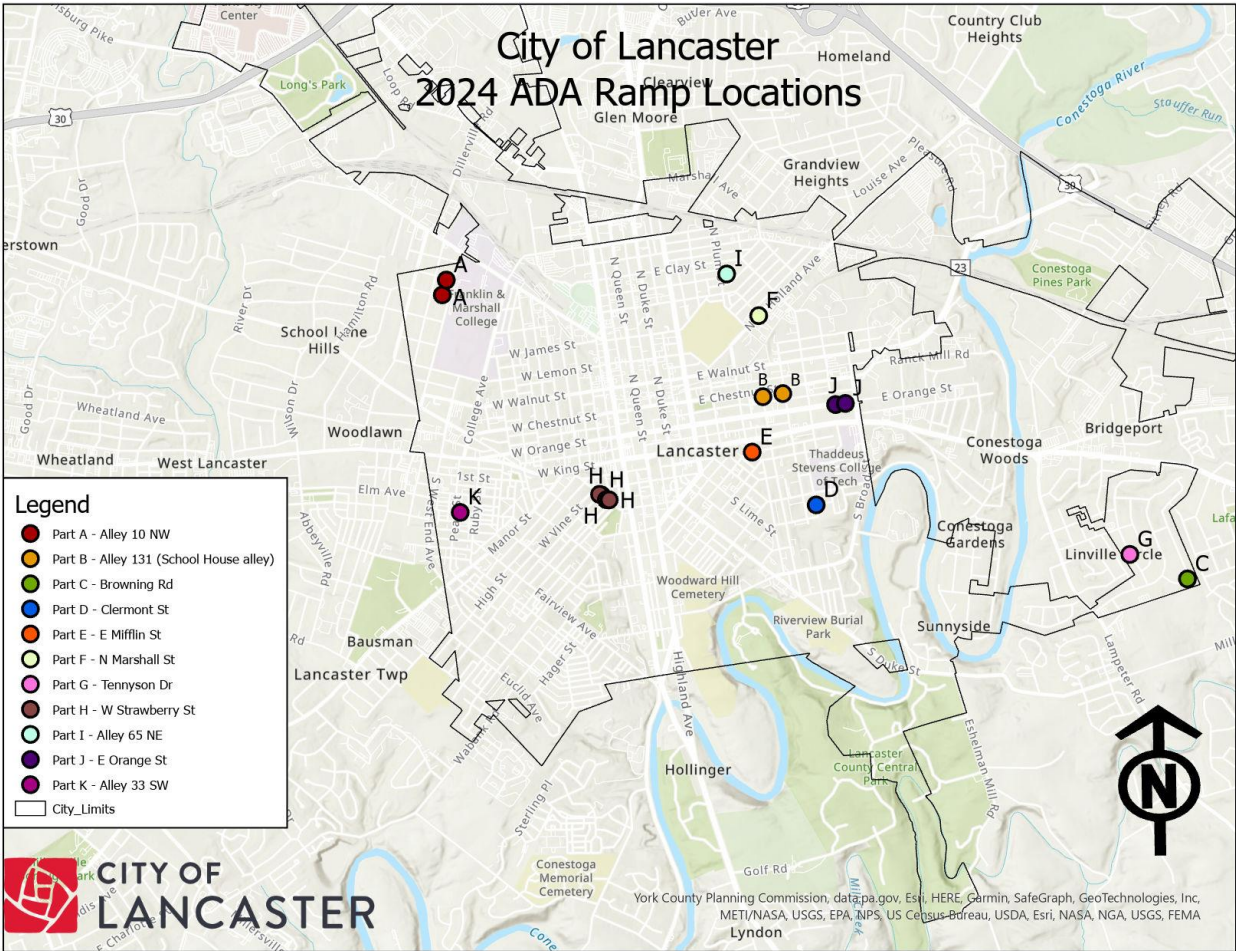
A total of 142 City residents were served through this activity in 2024, with 76% considered to be very-low, low- or moderate-income, receiving direct housing support services from the HRRC. Approximately 70% of the clientele served were women and 51% of clientele served were people with at least one disability. Tenfold's services included providing fair housing rights information, guidance, and counseling 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.

Place-Based Streetscape Improvements Activity

In 2024, \$189,525 in CDBG dollars were committed and spent on Place-Based Streetscape

Improvements in neighborhoods where 51% or more of residents are of low- to moderate-income in an effort to promote neighborhood quality of life and increase the economic viability and livability in socioeconomically disadvantaged areas. This funding supported the completion of 11 Pedestrian/ADA Improvement projects in predominately LMI areas in the City. These improvements increased the quality of life and safety of 17,190 residents.

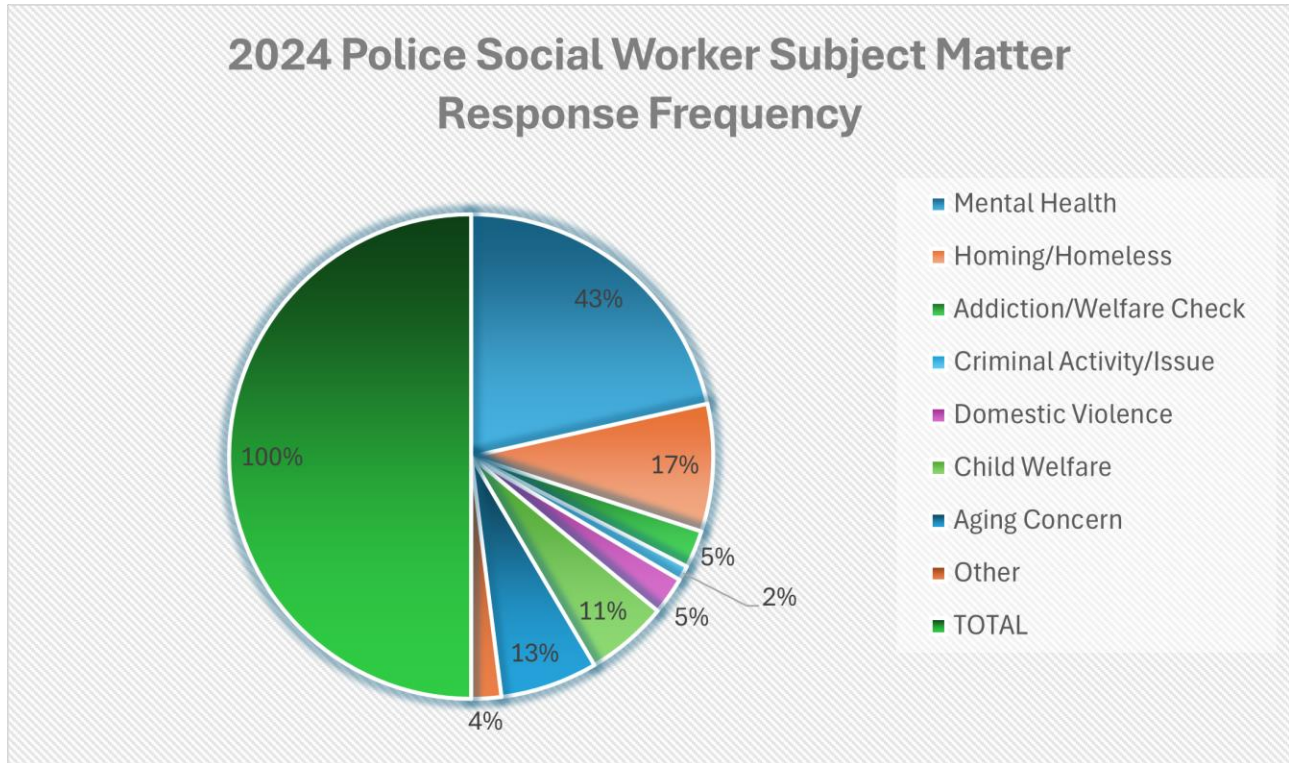
2024 Investment	% Low Income	Low Income Pop	% Low/Mod	Low/Mod Pop
Part A - Alley 10 NW	4%	63	11%	170
Part B - Alley 131 (School House Alley)	48.40%	475	75.80%	745
Part C - Browning Rd	9.30%	121	33.50%	438
Part D - Clermont St.	63.90%	656	76.60%	787
Part E - Mifflin St.	54.70%	205	72.40%	271
Part F- N. Marshall St.	43.30%	516	62.80%	747
Part G. - Tennyson Dr.	9.30%	121	33.50%	438
Part H - W Strawberry St.	37.70%	240	78.10%	496
Part I - Alley 65 NE	41.90%	356	58.70%	500
Part J - E Orange Street	60.90%	1102	72.10%	1304
Part K - Alley 33 SW	25.60%	410	47.30%	757
TOTAL POPULATION	36.30%	4605	56.50%	7172



Police Social Worker Activity

In 2024, the City dedicated \$18,855.52 of FY 2021 CDBG funding to assist the Bureau of Police’s 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 activity 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.

In 2024, this activity supported 422 Service Area beneficiaries by resolving issues related to mental health (43% of calls), housing or homelessness (17% of calls), aging or the elderly (13% of calls), child welfare (10% of calls), addiction or adult wellness (5% of calls), and domestic violence (5% of calls). This initiative improved police-led outcomes and enhanced the quality of life for Service Area residents.

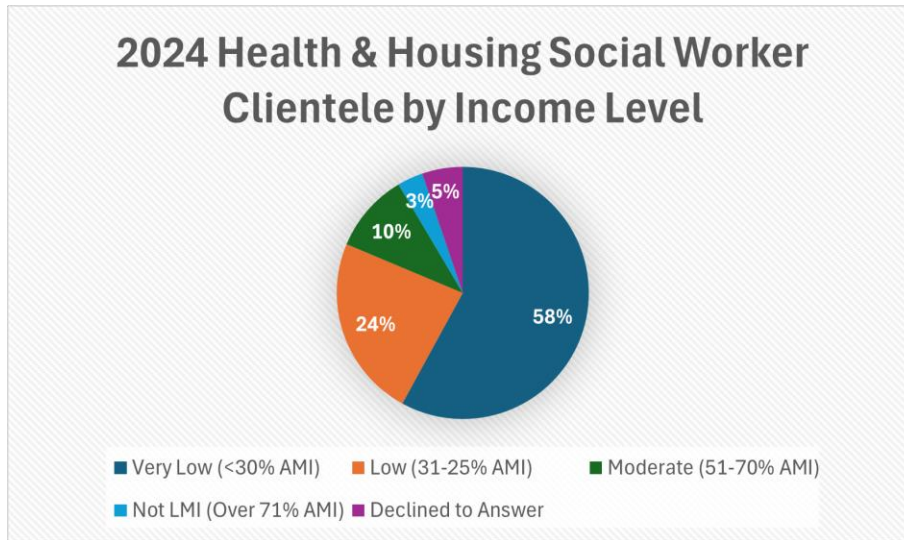


Health and Housing Social Worker

The City’s Health and Housing Social Worker activity is responsible for providing social services 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 2024, the Health and Housing Social Worker assisted 364 community members in resolving persistent health and housing-related issues to help them locate and secure affordable housing opportunities in the City, with 91.48% of the beneficiaries assisted being low- and moderate-income. Of the 364 individuals served through this program, 61% had a female head of household.

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. The City allocated \$72,000 of its FY2024 CDBG funding to support this critical work.



The Neighborhood Engagement Program Management Activity

The Department of Neighborhood Engagement Program Management Activity continued its mission of improving the quality of life for city residents by fostering collaboration, civic leadership, and resident-led strategies. 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. In 2024, \$72,000 in combined FY2023 and FY2024 CDBG funding was expended to help further these efforts.

In 2024, the Public Service City Project Manager activity implemented the following 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) Neighborhood Leaders Academy:
 - 47 students were served in the Students & Teachers Program;
 - 76 participants took part in the Adult Academy project;
 - Two community-based projects were developed in collaboration with local school districts;
 - Over 200 community members participated in the Hop Bus Program
- (2) Love Your Block: the program awarded 8 grants as part of this program;
- (3) Over 500 residents participated in community celebrations including
 - Holiday Tree Lighting;
 - Climate Action Neighbors;

- Community and Police Relations Engagement;
- Block Parties;
- Juneteenth Community Celebrations; and
- Community Gardens

Total Engagement and Impact: Across all programs, the Department of Neighborhood Engagement reached at least 823 residents through leadership training, community-led projects, and engagement initiatives.

Program	Residents Served Directly
Love Your Block	500+
Neighborhood Leadership Academy	323
TOTAL	823

The Program was designed to benefit LMI City residents, particularly underserved low-to-moderate income populations. The “Neighborhood Leaders Academy” empowered both youth and adults in underserved communities, fostering leadership skills and supporting community-driven projects. The “Love Your Block” program provided direct funding for resident-led projects, strengthening community engagement and improving neighborhood conditions. The “Hop Bus” initiative expanded access to programming, ensuring broader participation among residents.

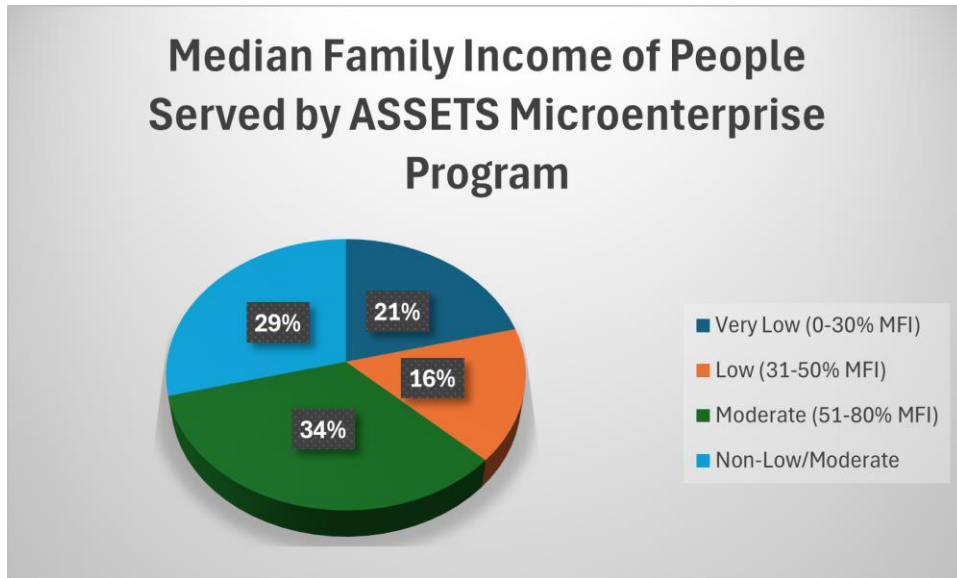
Goal 4: Expand Economic Opportunities

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 who successfully complete 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 2024, this program utilized \$20,000 in FY2023 CDBG funding. The program served 165 City participants, 71% of whom were of low- and moderate-income, who were seeking to start or expand microenterprises thereby empowering them with the necessary training, support, and financial resources necessary for successful small business development. These empowered entrepreneurs positively contributed to the economic development of the City of Lancaster by expanding small business opportunities. Of the 165 new businesses launched through this program in 2024, 101 were

spearheaded by female entrepreneurs.



Goal 5: Support Homeless 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 2024, 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.

In the absence of a direct ESG entitlement in 2024, the City of Lancaster, worked with Pennsylvania Department of Community and Economic Development (DCED) to secure \$277,117 in ESG funding in 2024 to support two projects to address homelessness in the City of Lancaster: (1) \$108,068 to support Tenfold's engineering costs for renovations and upgrades of the infrastructure and floorplan of the Transitional Living Center at 105 E. King Street to make the facility accessible to people with limited mobility; and (2) \$169,049 to support Lancaster County Housing and Redevelopment Authority's operating expenses, paying utility expenses, and purchasing and installing of furnishings and appliances for the low-barrier homeless shelter at 20 E. Clay Street which opened on December 31, 2024.

2024 CDBG-CV ACTIVITIES

In 2024, 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 2024 Program Year activities undertaken by the City utilizing this funding to support this effort.

In 2024, a total of \$113,697.14 in CDBG-CV funds were expended for the maintenance of sanitation facilities at public parks as well as trash and restroom management at an interim emergency low-barrier shelter following the unexpected closure of the city's only low-barrier shelter due to a boiler issue. These funds also supported the "Healthy Lives, Healthy Lancaster" health and well-being study, designed to identify and address individual and communal health needs, gaps, and disparities resulting from the COVID-19 pandemic.

Emergency Overnight and Drop-In Day Shelter Program

In 2024, the City of Lancaster invested \$11,031.29 in CDBG-CV funds for maintenance and services at the low-barrier emergency overnight and day shelter on Prince Street. These services included providing trash removal, restrooms, and handwashing areas for 191 unsheltered individuals in the City of Lancaster and provided supportive referral services in the areas of housing (32 individuals), substance abuse (7 individuals), food access (191 individuals), and clothing access (191 individuals). The City of Lancaster also used CDBG-CV funds in 2024 to fund a public restroom with handwashing area at Culliton Park in downtown Lancaster which served a large number of unsheltered individuals in 2024 at a total cost of \$4,900.95.

Community Health Needs Assessment Planning and Administration

In 2024, the City invested \$97,764.90 in CDBG-CV funds for consulting and professional fees toward the "Healthy Lives, Healthy Lancaster" project. The City of Lancaster, together with its professional consultants, identified 20+ community organizations and stakeholders to help define objectives for the study and lend support, tactics, and networking through biweekly meetings. This group, collectively called the "Advisory Committee" led discussions to inform the creation and implementation of the study. In January 2024, over 100 stakeholders attended the Advisory Committee's Partner Forum which detailed the process, objectives, and methods of the study and presented early data to engage in the discussion and impact of social drivers of health-on-health status and disparities within the City of Lancaster. The Community Survey launched in March 2024 and exceeded expectations. To date, more than 650 surveys have been completed and returned for analysis.

CR-10 - Racial and Ethnic composition of families assisted

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

91.520(a)

	CDBG	ESG
White	337	0
Black or African American	182	0
Asian	1	0
American Indian or American Native	3	0
Native Hawaiian or Other Pacific Islander	1	0
Other Multiracial	265	0
Declined or No Response	46	0
Total	839	0
Hispanic	357	0
Not Hispanic	482	0
Total	839	0

Table 2 – Table of assistance to racial and ethnic populations

Narrative

These statistics only include data from CDBG activities that were performed in 2024 and provided a direct benefit to specific households. These activities included the following:

1. The Critical Repair and Lead Hazard Reduction Activities;
2. The Fair Housing Services Activity;
3. The Health & Housing Social Worker Program Activity;
4. The Small Business Development (Microenterprise) Activity; and
5. The Affordable Housing Development Solutions Activity.

Please see *CR-05 - Goals and Outcomes* for more information on the impact of the indirect services provided to city residents. Additionally, please see the below image entitled *Demographics of the City of Lancaster, PA* for more specific information about the racial and ethnic composition of the City and refer to the chart below for a complete breakdown of demographics by program.

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)

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People Served by Race by Program									Hispanic/ Latino
	White	Black/African American	Asian	Native American/Alaskan Native	Native Hawaiian/Pacific Islander	Other/Multiracial	Declined or N/A	TOTALS	
Critical Repair/Lead Hazard Control	44	33	4	1	0	56	24	162	90
Fair Housing Program	96	35	0	0	0	6	5	142	53
Health & Housing Social Worker	118	51		1	0	181	13	364	152
Small Business/Microenterprise	77	63	1	1	1	22	0	165	98
Affordable Housing	2	0	0	0	0	0	4	6	1
TOTALS	337	182	1	3	1	265	46	839	394

Latinos Served by Programming			
	Latino/Hispanic	Non-Latino	TOTALS
Critical Repair/Lead Hazard Control	90	72	162
Fair Housing Program	48	94	142
Health & Housing Social Worker	152	212	364
Small Business/Microenterprise	67	98	165
Affordable Housing	0	6	6
TOTALS	357	482	839

Gender (Head of Household) Served by Program				
	Male	Female	N/A	TOTALS
Critical Repair/Lead Hazard Control	44	94	24	162
Fair Housing Program	99	42	1	142
Health & Housing Social Worker	144	220	0	364
Small Business/Microenterprise	59	106	0	165
Affordable Housing	2	0	4	6
TOTALS	348	462	29	839

Income Level Served by Programming							
	Extremely Low (<30% AMI)	Low (30%-50% AMI)	Moderate (50%-80% AMI)	Over 81% AMI	Declined to answer	N/A	TOTALS
Critical Repair/Lead Hazard Control	36	55	47	0	0	24	162
Fair Housing Program	66	27	15	3	31	0	142
Health & Housing Social Worker	203	105	20	22	14	0	364
Small Business/Microenterprise	34	27	56	48	0	0	165
Affordable Housing	5	1	0	0	0	0	6
TOTALS	344	215	138	73	45	24	839

Image 2: 2024 Demographics by Program

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public – federal	\$1,476,253	\$1,520,930.60
ESG	public – federal	\$0	\$0
CDBG-CV	Public – federal	\$0	\$113,697.14

Table 3 - Resources Made Available

Narrative

The \$1,520,930.60 in expenditures detailed above represents CDBG spending that occurred during the 2024 Program Year (January 1, 2024 – December 31, 2024) to support the goals and activities outlined in the City’s 2021 – 2025 Consolidated Action Plan and 2024 Annual Action Plan.

Additionally, \$113,697.14 in CDBG-CV funds were expended for trash removal, restroom facilities, and a handwashing area at an overnight/drop-in day shelter and a public restroom with handwashing area at Culliton Park in downtown Lancaster which served a large number of unsheltered individuals in 2024. These funds also supported the “Healthy Lives, Healthy Lancaster” health and well-being study, designed to identify and address individual and communal health needs, gaps, and disparities resulting from the COVID-19 pandemic.

Identify the geographic distribution and location of investments

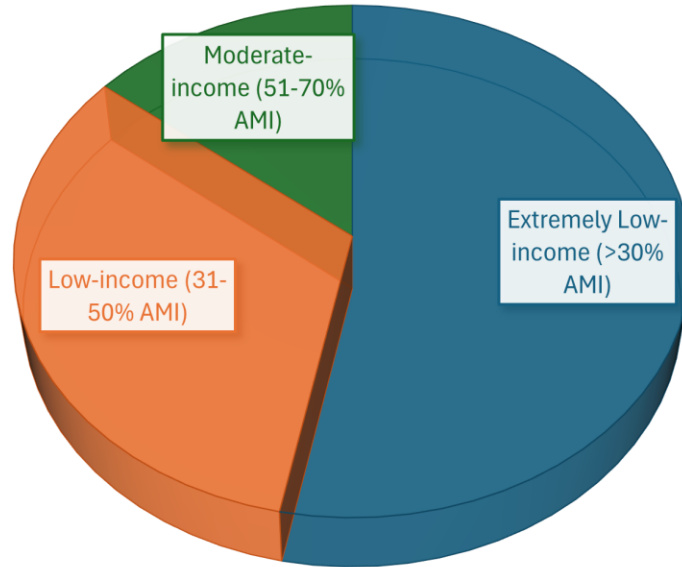
Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
LANCASTER CITY	100%	100%	100% in the City of Lancaster with a focus on LMI individuals

Table 4 – Identify the geographic distribution and location of investments

Narrative

In 2024, 100% of the CPD funds were spent within the City of Lancaster, with a focus on primarily benefitting predominately low- and moderate-income areas and City residents.

AVERAGE HOUSEHOLD INCOME OF INDIVIDUALS SERVED



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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 and the City Capital Improvement fund. The Critical Repair and Lead Hazard Control Programs continued to leverage the City's \$600,000 Healthy Homes Supplemental funding, a \$9.1M Lead Hazard Reduction Grant from the Department of Housing and Urban Development (HUD), and \$770,000 Lead Abatement and Remediation Funding from the Pennsylvania Department of Health. These combined services allowed the city to implement holistic, impactful approaches to strengthen the City's affordable housing stock and improve residents' wellbeing. Dollars allocated to the City of Lancaster expanded the Proactive Housing Code Enforcement Program, Neighborhood Engagement Program, and the Neighborhood Crime Reduction through Police Social Workers Program. The City of Lancaster also used CDBG City Planning dollars to leverage both a \$122,500 Municipal Assistance Grant and a \$25,000 Keystone Historic Preservation Grant for its East End Small Area Plan project.

The CDBG funds used for the Small Business Development (Microenterprise Development/ASSETS) program accounted for 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 financial support from private, state, and local sources as well as 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) serves as the base for the City's Housing and Building Code Enforcement Programs, Critical Repair Program, Lead Hazard Control Program, 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 utilized 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	646
Number of Special-Needs households to be provided affordable housing units	0	0
Total	127	646

Table 5 – 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	138
Number of households supported through Acquisition of Existing Units	0	0
Total	22	140

Table 6 – Number of Households Supported

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

The City of Lancaster surpassed its one-year goal of serving 127 non-homeless households to be provided affordable housing units by providing 646 households with affordable housing through a combination of the Critical Repair and Lead Hazard Programming Activity (138 households), the Fair Housing Activity (142 households), the Health & Housing Social Worker Activity (364 households) and the Affordable Housing Development Solutions Activity (2 households).

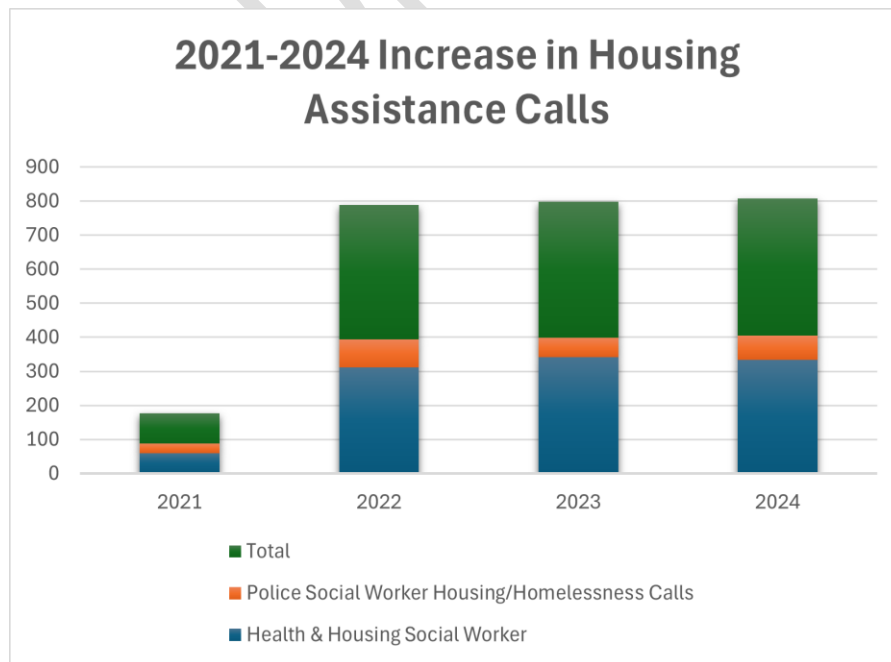
In 2024, the City collectively met or exceeded the goals and outcomes it had established for advancing affordable housing for our community. Overall, the City surpassed its housing rehabilitation goals by 700%, maintaining and providing affordable housing for 138 households through our Critical Repair and Lead Hazard Control Programs (all low- or moderate-income) and two households through the Affordable Housing Development Solutions activity for a total of 140 households. In addition, 24

vacant units were rehabilitated and will be rented to LMI households, The City’s subgrantee, SACA, purchased its final property funded with CDBG FY 2021 dollars and expects to complete and sell the unit to a low-income family by July 2025.

Furthermore, the City invested an additional \$20,000 in affordable and fair housing support for persons with disabilities through the CDBG-assisted Fair Housing Services activity. This activity, administered by the City’s subgrantee, Tenfold, oversaw set-aside units in the City and provided assistance to 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 deliver tangible, positive outcomes contributing to improving and strengthening accessibility to and availability of sustainable affordable housing opportunities in the City, particularly for low- and moderate-income households. Additionally, the City is also realizing success with the Health and Housing Social Worker program, which assisted 364 City residents who were seeking affordable housing, a substantial increase from the number of calls received in 2021. Furthermore, the Police Social Workers funded by CDBG dollars reported 17% of their total calls in 2024 were related to housing and homelessness. Given the measurable effectiveness of these programs, the City will continue to support and expand them, leveraging their successes to guide the development and implementation of future affordable housing initiatives.



The City did not receive FY2024 ESG Entitlement funding and does not anticipate receiving FY2025 ESG Entitlement funding. However, the City remains committed to identifying and securing alternative funding opportunities from Federal, State, and local sources to address this funding deficit.

Beginning in April 2025, the Community Development office will begin preparing for the 2026-2030 Consolidated Plan through multiple phases of community engagement. Community development professionals will share the outcomes of the 2021-2025 Consolidated Plan with members of the community and seek input from multiple stakeholders from multiple demographics to understand the greatest needs that are affecting our communities. The Community Development team will actively seek input from vulnerable and at-risk populations when informing the 2026-2030 Consolidated Planning process.

The City of Lancaster will apply lessons learned from these programs to develop viable and impactful approaches under the Affordable Housing Development Solutions Activity in future action plans. These adjustments will help align the activity with our overall strategic goals and ensure that our community’s housing needs are met efficiently and effectively.

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	306
Low-income	188
Moderate-income	82
Total	576

Table 7 – Number of Households Served

Narrative Information

The data above reflects the number of households served through direct benefit, affordable housing-related programs supported by CDBG dollars during the 2024 program year. A breakdown by income level and activity is provided below:

The Critical Repair and Lead Hazard Control Program Activities: 138 Low-and Moderate-Income Beneficiaries (100% LMI)

- Extremely Low-Income: 36 households
- Low-Income: 55 households
- Moderate-Income: 47 households

The Fair Housing Services Program Activity: 108 Low- and Moderate-Income Beneficiaries (95% LMI with 22% declining to provide income information)

- Extremely Low-Income: 66 households

- Low-Income: 27 households
- Moderate-Income: 15 households

The Health and Housing Social Worker Program Activity: 328 Low- and Moderate-Income Beneficiaries (91.48% LMI) *(note: 22 households receiving services were over 81% AMI and 14% declined to provide information about income)*

- Extremely Low-Income: 203 households
- Low-Income: 105 households
- Moderate-Income: 20 households

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

- Extremely Low-Income: 1 household
- Low-Income: 1 household
- Moderate-Income: 0 households

Overall in 2024, the City provided direct affordable housing benefits to a total of 576 households through HUD-assisted programming. Specifically, it served 310 extremely-low-income households, 188 low-income households, and 82 moderate-income households. As a result, 96.13% of the City's total CDBG-supported direct affordable housing beneficiaries were low- or moderate-income households, thereby advancing HUD's Community Planning & Development (CPD) Program goal of providing tangible affordable housing benefit to predominately low- and moderate-income persons and/or households.

The number of individuals served through HOME funded programs is included in the Lancaster County portion of the CAPER, as the County is the lead entity for the HOME consortium.

Citizens can also explore the City's work to further affordable housing opportunities at the following website, <https://lancaster-pa.maps.arcgis.com/apps/webappviewer/index.html?id=f584d91cd03f49ac802940603cac7e6a> 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 18 above for more information on the City as a whole.

The City participates in a HOME Consortium with Lancaster County and therefore the number of HOME persons served by the City is located in the Lancaster County CAPER as the County is the lead entity for the HOME consortium.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)
Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

Over the course of this period of performance, the City has substantially expanded its outreach efforts to help address homelessness and special needs by allocating funds to the Health and Housing Social Worker and the Police Social Worker positions. As the City has not been a direct recipient of ESG entitlement funding since 2021, the City participates in the Lancaster County Homelessness Coalition's Steering Committee and Grants Action Team to support the work of the Continuum of Care.

In 2024, Lancaster County continued operating its successful coordinated assessment/single point of entry system, known as the Community Homeless Assessment and Referral Team (CHART). CHART contracted with the 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 of clients at emergency shelters, the daytime drop-in center, on the street, or in other locations. Outreach Workers were trained to conduct CHART assessments, reducing the number of contacts needed for a client needed to be connected with essential services.

CHART does the following:

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

Addressing the emergency shelter and transitional housing needs of homeless persons

Emergency Shelter services aim to assist individuals who are literally homeless and sleeping on the streets or in places not meant for human habitation and are at high risk of physical, mental, financial, and emotional harm, by helping them find suitable sleeping accommodations and connect with other appropriate support services. In 2024 the Lancaster County Homelessness Coalition, in collaboration with the City, significantly increased the overall low-barrier shelter capacity from 40 emergency winter

beds to a permanent facility, the Clay Street Shelter, with 80 year-round beds.

Other current City Shelters include TLC (overnight and day shelter), Good Samaritan Services (overnight), YWCA (overnight, for women), and the Water Street Mission (overnight).

Additionally, the City directly supported the work of providers by applying for and receiving DCED ESG grants for two homelessness housing projects in 2024. First, Tenfold received \$108,068 for the renovation of its Transitional Living Center at 105 E. King Street which was matched dollar for dollar by the High Foundation. Second, DCED funded Lancaster County Housing and Redevelopment Authority's (LCHRA's) Clay Street low-barrier shelter at 20 E. Clay Street in the City of Lancaster in the amount of \$169,049 leveraged by a \$169,049 match by PHFA Home4Good Grant, County's Homeless Assistance, and an additional \$40,000 gift from PA State Representative Ismail Smith-Wade-El's Office.

The City of Lancaster performed an environmental review on both properties and continues to manage these grants.

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 component of the Lancaster homeless service infrastructure is outreach. Many outreach clients require not only practical supplies like food, sleeping bags, and hygiene items, but also case management services, such as assistance in filling out SSI or welfare applications, linking to area resources, or help locating jobs or affordable housing.

The CoC works with the Lancaster County Children and Youth Agency (CYA), which 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 the specific needs of older IL youth. Community volunteers also mentor youth for ongoing support as they transition into independent housing.

The Lancaster County Continuum of Care has met with publicly funded institutions to ensure proper discharge planning. Hospitals, county behavioral health services, housing, and other social service providers were represented at 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 the Leadership Board). City and County staff also participated at all levels of the Continuum of Care.

The LCCH is 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 for helping individuals experiencing homelessness transition to permanent housing and independent living. Rapid re-housing has assisted chronically homeless individuals and families, families with children, veterans and their families, and others to move out of homelessness and into permanent housing as quickly as possible. Tenfold operates a rapid re-housing activity program, the "Shelter To Independent Living Program."

The skills and disciplines taught through the provision of rapid re-housing casework services, as well as 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.

DRAFT

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

Actions taken to address the needs of public housing

In 2024, the City worked with the Lancaster City Housing Authority (LCHA) to maintain existing public housing and to continue to find 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 across six (6) communities. Housing is also provided through the Section 8 Housing Choice Voucher Program, with LCHA administering 1,003 vouchers by matching eligible applicants with participating private landlords. Additionally, LCHA 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.

LCHA and City community development staff met in 2024 to discuss the requirements for receiving CDBG affordable housing funding in the future.

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

LCHA strives to foster the development, ownership, and successful management of the City's public housing programs to empower citizens toward 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

Not applicable, as 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. Key accomplishments in 2024 include:

(1) 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.

(2) Our Future Lancaster, the City’s Comprehensive Plan adopted in 2023, names Housing Choice as a major policy initiative in System 1 – Strengthening Neighborhoods & Housing. Policies included in this element include Housing Production, Housing Preservation, Housing Affordability, Housing Quality and Safety, Homelessness, Housing Inclusion and Innovation, Energy-Efficient Rehabilitation, Housing Stability, and Home Ownership. Through this plan, the City administration continues to further affordable housing development. The entire plan can be viewed at <https://compplan.cityoflancasterpa.gov/>.

(3) 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.

(4) The Health and Housing Social Worker also provides bilingual English and Spanish support to further reduce access barriers to affordable housing.

(5) 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.

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 Healthy Homes Grants to underserved and vulnerable low- and moderate-income households.
- c. Continue to provide Critical Repair Grants and Loans to help disadvantaged homeowners offset the economic hardship caused by emergency repairs to critical household systems and fixtures for low- and moderate-income households.

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

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

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

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

5. Goal 5: Sustain existing affordability and neighborhood vitality

- a. Continue to provide financial support to prevent housing insecurity caused by the impact of COVID-19 to prevent eviction and displacement.
- b. Expand and investigate avenues to assist low-income residents in homeownership through Low-Interest Home Loans and Façade Improvement Grants.
- c. Help low-income residents achieve homeownership and build wealth with mechanisms such as Down Payment Assistance, Live Near Your Work Grants, and the Tenant Opportunity to Purchase Act.
- d. Continue to contribute resources to strengthen and expand the City's homeless shelter system to better meet the needs of this vulnerable population, including expanding current capacity by 20 – 30 shelter beds and 100 emergency shelter beds.

A copy of the City's Interim Housing Strategy is included as an attachment to this report.

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% of Area Median Income (AMI). To alleviate financial burdens for beneficiaries below 50% AMI, the Critical Repair program adjusted its design in 2021 to provide grants for emergency critical repairs in lieu of forgivable or due upon sale loans requiring liens, to better serve the lowest income households. The City's Proactive 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 which 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 low-income households, on various CDBG and HOME-assisted initiatives detailed in Lancaster County's Consortium reporting.

Specifically, the City utilized 2024 CDBG funds to address the needs of the underserved in 4 main ways.

- (1) The Critical Repair and Lead Hazard Control Programs focused on addressing the housing health, safety, and stability of owner-occupied units through lead-paint testing and remediation, addressing critical health and safety components, and overall preservation of the City's affordable housing stock.
- (2) The Fair Housing Services program provided community 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.

(3) The City continued activities to complete a city-focused Health Needs Assessment utilizing CDBG-CV funding to identify and analyze unmet health needs exacerbated by the pandemic, utilizing a Social Determinants of Health (SDOH) framework. The assessment was completed in late 2024 and findings are being collated into a final report with recommendations for implementation.

(4) CDBG Affordable Housing Development Solutions funding allocated in 2023 to SACA Development Corporation funded two additional housing units and sold them to verified low-income and very-low-income homebuyers in 2024.

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 supplemented with CDBG funding.

In 2019, the City was awarded a \$9.1M Lead Hazard Reduction Grant through the U.S. Department of Housing and Urban Development, plus an additional \$700,000 in Healthy Homes Supplemental funding. These dollars will be used to systematically make 435 housing units lead-safe over five (5) years. 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 address an unmet need. An overwhelming majority of houses in the focus area were built before 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, indicating this issue disproportionately affects the City's most vulnerable populations.

In 2024, 115 properties were addressed by the City's lead programming to reduce lead-based paint hazards, which ensured lead-safe housing for 495 family members, including 271 children. Also in 2024, the program was awarded an additional \$7.75 million for lead hazard remediation over the next 5 years.

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

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

designed to alleviate poverty-driven economic, health, and housing constraints and strengthen well-being and socioeconomic viability in the City of Lancaster.

In 2024, the City 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 incidences of poverty. The following CDBG programs represent actions that the City undertook in 2024 to ameliorate conditions and issues sustaining poverty for the City's most vulnerable households 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 support necessary to address lead hazards and conduct emergency critical repairs in 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, combating housing inequality and housing cost burden.
4. The Fair Housing Services Activity: Furthering the provision and accessibility of 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.

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. CPED worked to collaborate within and across departments and organizations to develop practical solutions to addressing homelessness. The internal Homelessness Response Team (HRT) continued in 2024 to connect 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 participated in the Steering Committee for the Lancaster County Homelessness Coalition, with the Bureau Chief of Health serving as the Vice Chair.

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 2024, CPED representatives participated in a variety of committees and boards to enhance intra-city collaboration, communication, and relationship-building, continuing to develop institutional structures. This involvement helps the City 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
- SoWe: Southwest Neighbors
- Beaver Street Working Group
- Homelessness Response Team
- Eviction Prevention Network
- Tenfold's Housing Rights and Resource Center
- 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 persons 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 an effort to enhance community coordination, City employees participate in various boards and committees whose memberships provide a network that spans private housing and social service agencies – such as Tenfold and the Lancaster County Homelessness Coalition. Additionally, the Health and Housing Social Worker provides a direct connection to both public and private housing opportunities and coordinates 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 the provision of affordable housing and supportive services.

Through the Police Social Worker activity, the City has taken actions to enhance coordination between itself, the Bureau of Police, and local health, housing, and social service agencies to address the intersecting needs of residents. This activity provides a mechanism to collocate and enhance public and private coordination, offering direct assistance to city residents and connecting them to the appropriate agencies and services.

The City works with SACA Development Corporation, which develops affordable housing for low and moderate-income households. SACA also provides social services to seniors and other community members 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 consists of various social services organizations, civil servants, faith-based community members, mental health providers, and housing agencies. While the main goal of the coalition is focused on ending homelessness, housing plays a key role in executing that goal. The coalition also fosters partnerships and networking 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 2024, the City of Lancaster continued to support the Fair Housing Services Program. This program, carried out by Tenfold's Housing Rights and Resources Center (HRRRC), 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 regarding Fair Housing law and landlord/tenant issues and worked to address Impediments 1, 2, 4, 5, and 6 identified in this analysis.

The lack of ADA accessibility persists as a barrier impacting fair housing choices 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 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. Additionally, the Lead Program Coordinator 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 Latinx community. 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 2024 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 2024, 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.

DRAFT

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.

In 2024, 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. Time of Performance
 - a. The City of Lancaster enters into one-year contracts with Subrecipients unless otherwise specified.
 - b. Subrecipients are required to carry out the obligations specified in their Subrecipient Agreements.
 - c. The period of performance may only begin upon the completion of an environmental review pursuant to 24 CFR Part 58.
2. Requests for Reimbursement
 - a. The Subrecipient must submit requisitions for reimbursement to the City on a monthly basis unless otherwise agreed upon using itemized vouchers (monthly invoices) provided by the City.
 - b. Requisitions for Reimbursement must indicate how project expenditures directly relate to services provided under the Subrecipient Agreement.
 - c. A Participant Characteristic Report (provided by the City) detailing the demographics of persons serviced by the contracted services will accompany each Requisition for Reimbursement
3. Limitations of Reimbursement

- a. Cash Advances – The City shall not provide any cash advances to the Subrecipient for anticipated costs. All grant funds shall be release to the Subrecipient by the City only as a reimbursement for actual costs incurred for providing the level of Project services provided during the previous month, or other interval of time if previously agreed upon by both parties.
 - b. Accumulation of Funds – The Subrecipient certifies that it will not accumulate Program Funds in reserve. Any interest earned on reimbursements that exceed actual costs incurred during the previous month shall be governed as “program income.”
 - c. Documentation – Subrecipient must maintain appropriate and necessary documentation supporting the monthly invoices submitted for reimbursement for services provided by it under its Subrecipient Agreement and detailing the types of service. It shall be available for review by the City at all reasonable times upon request.
 - d. Compliance – Subrecipient must be able to certify its compliance with the Subrecipient Agreement provisions at all times maintaining appropriate supporting financial documentation and by making said documentation available to the City at all reasonable times upon request.
 - e. Eligibility/Acceptability – The City shall retain the right, after consultation with the Subrecipient, to determine the final eligibility of the units of service provided and claimed for reimbursement by the Subrecipient under the terms of the Subrecipient Agreement.
4. Performance Monitoring and Reporting
 - a. The City will monitor the performance of the Subrecipient against the goals and performance standards specifically enumerated in the Subrecipient’s Agreement.
 - b. The Subrecipient shall submit regular progress reports to the City in the form, with the content, and at the frequency required by the City (pursuant to the Subrecipient’s Agreement with the City).
 - c. The Subrecipient is required to submit an annual audit prepared by independent auditors to the City on or before nine months (270 days) of the end of its fiscal year, even if the amount of federal funds received by the Subrecipient is below the federal audit threshold. Failure to submit the proper audit (and corrective action plan, if required), to the City within this 270 day period may result in the suspension of federal grant payments.
 5. Technical 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.

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

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

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

A legal advertisement was placed in the City of Lancaster's most prominent local newspaper, the LNP, on Thursday, March 13, 2025, announcing a 14-day public comment period that concluded on March 30, 2025.

A copy of the draft report was posted on the City's website on March 15, 2025 and a hard copy version of the report was made available in City Hall during this period. A public meeting was also held at City Hall in City Council Chambers on Thursday, March 27, 2025, at 12:30 PM, and streamed online with the recording available on the City's YouTube page. The City also solicited public comments and feedback on its 2024 performance report via the following link:

<https://www.cityoflanasterpa.gov/departments/department-of-community-planning-economic-development/community-development/>

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.

In 2024, the City of Lancaster submitted substantial amendments to the 2021, 2022, 2023, and 2024 Annual Action Plans and all have been approved by HUD. These amendments will adjust resources to meet the current needs of the community in our final year of the Consolidated Action Plan.

Changes Made by Substantial Amendment

On March 4, 2025, the City of Lancaster submitted the following Substantial Amendments to reallocate previously unspent CDBG allocations from previous Annual Action to unrestricted categories:

1. Combined 2021-2025 Consolidated Plan and 2021 Annual Action Plan:
 - a. The City of Lancaster reduced the Lancaster Rec HVAC activity in the Promote Neighborhood Quality of Life goal by \$69,223 to reallocate the funds to creating a community garden called the Bay Street Garden, which will operate under the same IDIS Activity ID number. The HVAC renovation is no longer needed and the community garden will serve as a new community facility need.
 - b. The City of Lancaster reduced the Neighborhood Crime reduction through the Police Social Worker Position in the Promote Neighborhood Quality of Life goal by \$9,720. These funds were unspent due to staffing limitations and now must be reallocated due to service caps.

- c. The City of Lancaster reduced the Building Codes Enforcement activity in the Expand Economic Opportunities goal by \$129,450. This program generated enough program revenue to discontinue the use of CDBG entitlement funding.
 - d. The City of Lancaster reallocated \$5,777 of the reallocated funding to the Bay Street Community Garden to bring the total funding back to \$75,000 in the Promote Neighborhood Quality of Life goal.
 - e. The City of Lancaster Reallocated the remaining \$133,392 to Affordable Housing Solutions activity within the Increase Affordable Housing Opportunities goal to address the growing need for affordable housing in the City of Lancaster.
2. 2022 Annual Action Plan:
- a. The City of Lancaster reduced the CDBG Program Administration allocation by \$34,829.81. This unspent funding must be reallocated due to the administrative funding cap.
 - b. The City of Lancaster reduced the Neighborhood Crime reduction through the Police Social Worker Position in the Promote Neighborhood Quality of Life goal by \$78,935. These funds were unspent due to staffing limitations and now must be reallocated due to service caps.
 - c. The City of Lancaster increased the Critical Repair and Lead Hazard Control Program Administration activity in the Maintain Affordable, Good Quality Housing goal by \$113,764 to meet an increased community need.
3. 2023 Annual Action Plan:
- a. The City of Lancaster reduced the CDBG Program Administration, Indirect Program Administration, and City Planning allocations by \$134,214. This unspent funding must be reallocated due to the administrative funding cap.
 - b. The City of Lancaster increased the Critical Repair and Lead Hazard Control Program Administration activity in the Maintain Affordable, Good Quality Housing goal by \$85,236 to meet an increased community need.
 - c. The City of Lancaster Reallocated the remaining \$51,978 to Affordable Housing Solutions activity within the Increase Affordable Housing Opportunities goal to address the growing need for affordable housing in the City of Lancaster
4. 2024 Annual Action Plan:
- a. The City of Lancaster increased the City Planning allocation by \$5,910 to meet an increased community need.
 - b. The City of Lancaster reduced the Neighborhood Crime reduction through the Police Social Worker Position in the Promote Neighborhood Quality of Life goal by \$54,750. These funds were unspent due to staffing limitations and now must be reallocated due to service caps.
 - c. The City of Lancaster reduced the Public Service City Program Program Manager in the Promote Neighborhood Quality of Life goal by \$54,750. These funds were upspent due to staffing limitations and now must be reallocated due to service caps.

- d. The City of Lancaster Reallocated the remaining \$119,840 to Affordable Housing Solutions activity within the Increase Affordable Housing Opportunities goal to address the growing need for affordable housing in the City of Lancaster.

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

No

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

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CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	1	0	0	0	0
Total Labor Hours	2,958				
Total Section 3 Worker Hours	0				
Total Targeted Section 3 Worker Hours	0				

Table 8 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers					
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.					
Direct, on-the job training (including apprenticeships).					
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	1				
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).					
Outreach efforts to identify and secure bids from Section 3 business concerns.	1				
Technical assistance to help Section 3 business concerns understand and bid on contracts.	1				
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.					
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	1				
Held one or more job fairs.					
Provided or connected residents with supportive services that can provide direct services or referrals.					
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.					
Assisted residents with finding child care.					
Assisted residents to apply for, or attend community college or a four year educational institution.					
Assisted residents to apply for, or attend vocational/technical training.					
Assisted residents to obtain financial literacy training and/or coaching.					
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.					
Provided or connected residents with training on computer use or online technologies.					
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.					
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.					

Other.					
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Table 9 – Qualitative Efforts - Number of Activities by Program

Narrative

The City of Lancaster encourages the participation of Section 3 businesses in our procurement processes. The Critical Repair and Lead Hazard Reduction Control Programs provide technical assistance to contractors to help them compete for opportunities and assist residents in obtaining Lead Safe work certifications and other training required to perform federally-funded housing rehabilitation work. Both programs also divide rehabilitation work into smaller jobs by trade and household assistance to encourage participation by Section 3 or local small business concerns and to lower the barrier to entry for job/bid competition.

DRAFT



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	1,124,150.65
06 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	96,406.77
07 DISBURSED IN IDIS FOR SECTION 108 REPAYMENTS	0.00
08 TOTAL EXPENDITURES (SUM, LINES 05 - 07)	1,220,557.42
09 UNEXPENDED BALANCE (LINE 04 - LINE8)	332,381.58

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	1,124,150.65
13 TOTAL LOW/MOD CREDIT (SUM, LINES 10 - 12)	1,124,150.65
14 AMOUNT SUBJECT TO LOW/MOD BENEFIT (LINE 05)	1,124,150.65
15 PERCENT LOW/MOD CREDIT (LINE 13/LINE 14)	100.00%

PART IV: PUBLIC SERVICE (PS) CALCULATIONS

16 DISBURSED IN IDIS FOR PUBLIC SERVICES	738,768.30
17 CDBG-CV GRANT	1,552,939.00
18 PERCENT OF FUNDS DISBURSED FOR PS ACTIVITIES (LINE 16/LINE 17)	47.57%

PART V: PLANNING AND ADMINISTRATION (PA) CAP

19 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	98,218.65
20 CDBG-CV GRANT	1,552,939.00
21 PERCENT OF FUNDS DISBURSED FOR PA ACTIVITIES (LINE 19/LINE 20)	6.32%



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

No data returned for this view. This might be because the applied filter excludes all data.

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

No data returned for this view. This might be because the applied filter excludes all data.

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

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2020	5	1873	6529488	City Health Worker for COVID-19 Support	05M	LMA	\$15,854.72
			6578570	City Health Worker for COVID-19 Support	05M	LMA	\$15,315.97
			6601348	City Health Worker for COVID-19 Support	05M	LMA	\$20,766.28
			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	
	6938133		Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$1,120.00	
	2063	6956374	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$1,446.15	
		6983125	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$1,183.20	
		6983131	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$280.00	
		6999890	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$591.60	
		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	
		6938133	Emergency Overnight and Drop-In Day Shelter Program (COVID-19)	03T	LMC	\$2,162.97	
	6	1874	6983131	Emergency Overnight and Drop-In Day Shelter Program (COVID-19)	03T	LMC	\$4,267.95
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	



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Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount	
2020	6	1874	6529488	Eviction Prevention Network	05Q	LMC	\$44,828.55	
		1875	6471931	Utility Assistance Program	05Q	LMC	\$7,490.06	
		6495243	Utility Assistance Program	05Q	LMC	\$768.75		
		6529488	Utility Assistance Program	05Q	LMC	\$9,467.76		
	7	1969	6601348	928 N Plum Street	14A	LMH	\$8,807.45	
			1972	6601348	740 S Lime Street	14A	LMH	\$6,800.00
		1974	6648271	740 S Lime Street	14A	LMH	\$2,435.00	
			6601348	608 S Ann Street	14A	LMH	\$7,600.00	
		1976	6648271	608 S Ann Street	14A	LMH	\$8,700.00	
			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							\$1,130,473.40	

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	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
			6670706	Public Service Outreach Specialist (CV - Public Health Services)	05Z	LMA	\$16,737.75
	1995	6617778	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



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Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount	
2020	5	1995	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	
			6938133	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$1,120.00	
			6956374	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$1,446.15	
			6983125	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$1,183.20	
			6983131	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$280.00	
			6999890	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$591.60	
			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		
	6938133	Emergency Overnight and Drop-In Day Shelter Program (COVID-19)		03T	LMC	\$2,162.97		
	6983131	Emergency Overnight and Drop-In Day Shelter Program (COVID-19)		03T	LMC	\$4,267.95		
	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	
		1875	6529488	Eviction Prevention Network	05Q	LMC	\$44,828.55	
			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	
	Total							\$738,768.30

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

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2020	5	2062	6810659	Community Health Needs Assessment - Planning & Administration	20		\$443.64
			6873106	Community Health Needs Assessment - Planning & Administration	20		\$130.59
			6938133	Community Health Needs Assessment - Planning & Administration	20		\$93,187.05
			6956374	Community Health Needs Assessment - Planning & Administration	20		\$2,645.49
			6983125	Community Health Needs Assessment - Planning & Administration	20		\$10.11
			6983131	Community Health Needs Assessment - Planning & Administration	20		\$390.61
			6999890	Community Health Needs Assessment - Planning & Administration	20		\$1,411.16
Total							\$98,218.65



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PART I: SUMMARY OF CDBG RESOURCES

01 UNEXPENDED CDBG FUNDS AT END OF PREVIOUS PROGRAM YEAR	0.00
02 ENTITLEMENT GRANT	1,451,253.00
03 SURPLUS URBAN RENEWAL	0.00
04 SECTION 108 GUARANTEED LOAN FUNDS	0.00
05 CURRENT YEAR PROGRAM INCOME	33,459.57
05a CURRENT YEAR SECTION 108 PROGRAM INCOME (FOR SI TYPE)	0.00
06 FUNDS RETURNED TO THE LINE-OF-CREDIT	0.00
06a FUNDS RETURNED TO THE LOCAL CDBG ACCOUNT	0.00
07 ADJUSTMENT TO COMPUTE TOTAL AVAILABLE	0.00
08 TOTAL AVAILABLE (SUM, LINES 01-07)	1,484,712.57

PART II: SUMMARY OF CDBG EXPENDITURES

09 DISBURSEMENTS OTHER THAN SECTION 108 REPAYMENTS AND PLANNING/ADMINISTRATION	612,170.07
10 ADJUSTMENT TO COMPUTE TOTAL AMOUNT SUBJECT TO LOW/MOD BENEFIT	0.00
11 AMOUNT SUBJECT TO LOW/MOD BENEFIT (LINE 09 + LINE 10)	612,170.07
12 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	144,022.53
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)	756,192.60
16 UNEXPENDED BALANCE (LINE 08 - LINE 15)	728,519.97

PART III: LOWMOD BENEFIT THIS REPORTING PERIOD

17 EXPENDED FOR LOW/MOD HOUSING IN SPECIAL AREAS	0.00
18 EXPENDED FOR LOW/MOD MULTI-UNIT HOUSING	0.00
19 DISBURSED FOR OTHER LOW/MOD ACTIVITIES	612,170.07
20 ADJUSTMENT TO COMPUTE TOTAL LOW/MOD CREDIT	0.00
21 TOTAL LOW/MOD CREDIT (SUM, LINES 17-20)	612,170.07
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	104,668.17
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)	104,668.17
32 ENTITLEMENT GRANT	1,451,253.00
33 PRIOR YEAR PROGRAM INCOME	61,799.67
34 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PS CAP	0.00
35 TOTAL SUBJECT TO PS CAP (SUM, LINES 32-34)	1,513,052.67
36 PERCENT FUNDS OBLIGATED FOR PS ACTIVITIES (LINE 31/LINE 35)	6.92%

PART V: PLANNING AND ADMINISTRATION (PA) CAP

37 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	144,022.53
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)	144,022.53
42 ENTITLEMENT GRANT	1,451,253.00
43 CURRENT YEAR PROGRAM INCOME	33,459.57
44 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PA CAP	0.00
45 TOTAL SUBJECT TO PA CAP (SUM, LINES 42-44)	1,484,712.57
46 PERCENT FUNDS OBLIGATED FOR PA ACTIVITIES (LINE 41/LINE 45)	9.70%



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

No data returned for this view. This might be because the applied filter excludes all data.

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
2023	8	2072	6858373	2023 Place-based Streetscape Improvements	03K	LMA	\$11,943.75
					03K	Matrix Code	\$11,943.75
2021	10	1931	6858373	Neighborhood Crime Reduction through Police Social Worker Program	05I	LMA	\$2,581.39
2021	10	1931	6873106	Neighborhood Crime Reduction through Police Social Worker Program	05I	LMA	\$898.94
2021	10	1931	6938133	Neighborhood Crime Reduction through Police Social Worker Program	05I	LMA	\$7,000.00
2021	10	1931	6956374	Neighborhood Crime Reduction through Police Social Worker Program	05I	LMA	\$7,843.44
					05I	Matrix Code	\$18,323.77
2023	11	2073	6858373	2023 Health & Housing Social Worker	05X	LMC	\$19,680.19
2023	11	2073	6873106	2023 Health & Housing Social Worker	05X	LMC	\$8,325.40
2023	11	2073	6938133	2023 Health & Housing Social Worker	05X	LMC	\$9,397.61
					05X	Matrix Code	\$37,403.20
2022	9	2027	6858373	2022 Public Service City Project Manager (DoNE)	05Z	LMA	\$3,444.21
2023	9	2074	6858373	2023 City Public Service Program Management (DoNE Program Management)	05Z	LMA	\$33,336.23
2023	9	2074	6873106	2023 City Public Service Program Management (DoNE Program Management)	05Z	LMA	\$6,031.14
2023	9	2074	6938133	2023 City Public Service Program Management (DoNE Program Management)	05Z	LMA	\$6,129.62
					05Z	Matrix Code	\$48,941.20
2021	6	2064	6873106	Affordable Housing Development Solutions: Scattered Site Single-Family Rehabilitation	14A	LMH	\$75,951.34
2023	5	2065	6858373	630 S Ann Street	14A	LMH	\$1,276.00
2023	5	2079	6858373	51 Prospect Street	14A	LMH	\$4,180.00
2023	5	2080	6858373	820 Second Street	14A	LMH	\$7,845.00
2023	5	2081	6858373	53 S Marshall Street	14A	LMH	\$8,522.00
2023	5	2082	6873106	527 Lancaster Avenue	14A	LMH	\$11,650.00
2023	5	2083	6873106	546 Hamilton Street	14A	LMH	\$4,905.00
2023	5	2084	6873106	1315 Fremont Street	14A	LMH	\$10,400.00
2023	5	2085	6858373	621 S Christian Street	14A	LMH	\$6,100.00
2023	5	2086	6873106	727 High Street	14A	LMH	\$1,600.00
2023	5	2091	6873106	450 S Ann Street	14A	LMH	\$7,070.00
2023	5	2093	6873106	715 Fourth Street	14A	LMH	\$11,000.00
2023	5	2094	6873106	34 Laurel Street	14A	LMH	\$9,058.25
					14A	Matrix Code	\$159,557.59
2020	9	1849	6858373	Critical Repair and Lead Hazard Reduction Program Admin	14H	LMC	\$14,587.60
2021	4	1934	6858373	Critical Repair and Lead Hazard Reduction Program Admin	14H	LMH	\$423.06
2022	3	2015	6858373	2022 Critical Repair and Lead Hazard Control Program Administration	14H	LMH	\$24,751.43
2022	3	2015	6873106	2022 Critical Repair and Lead Hazard Control Program Administration	14H	LMH	\$1,309.68
2022	3	2015	6938133	2022 Critical Repair and Lead Hazard Control Program Administration	14H	LMH	\$4,858.01
2022	3	2015	6956374	2022 Critical Repair and Lead Hazard Control Program Administration	14H	LMH	\$2,946.25
2023	3	2070	6858373	2023 Critical Repair and Lead Hazard Control Program Admin	14H	LMH	\$22,105.39
2023	3	2070	6873106	2023 Critical Repair and Lead Hazard Control Program Admin	14H	LMH	\$24,826.77
2023	3	2070	6938133	2023 Critical Repair and Lead Hazard Control Program Admin	14H	LMH	\$66,825.01
2023	3	2070	6956374	2023 Critical Repair and Lead Hazard Control Program Admin	14H	LMH	\$44,324.56
					14H	Matrix Code	\$206,957.76
2023	6	2071	6858373	2023 Proactive Housing Code Enforcement	15	LMA	\$92,217.84
2023	6	2071	6873106	2023 Proactive Housing Code Enforcement	15	LMA	\$35,637.64
2023	6	2071	6938133	2023 Proactive Housing Code Enforcement	15	LMA	\$1,064.69
2023	6	2071	6956374	2023 Proactive Housing Code Enforcement	15	LMA	\$122.63
					15	Matrix Code	\$129,042.80
Total							\$612,170.07

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



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PART I: SUMMARY OF CDBG RESOURCES

01 UNEXPENDED CDBG FUNDS AT END OF PREVIOUS PROGRAM YEAR	0.00
02 ENTITLEMENT GRANT	1,451,253.00
03 SURPLUS URBAN RENEWAL	0.00
04 SECTION 108 GUARANTEED LOAN FUNDS	0.00
05 CURRENT YEAR PROGRAM INCOME	33,459.57
05a CURRENT YEAR SECTION 108 PROGRAM INCOME (FOR SI TYPE)	0.00
06 FUNDS RETURNED TO THE LINE-OF-CREDIT	0.00
06a FUNDS RETURNED TO THE LOCAL CDBG ACCOUNT	0.00
07 ADJUSTMENT TO COMPUTE TOTAL AVAILABLE	0.00
08 TOTAL AVAILABLE (SUM, LINES 01-07)	1,484,712.57

PART II: SUMMARY OF CDBG EXPENDITURES

09 DISBURSEMENTS OTHER THAN SECTION 108 REPAYMENTS AND PLANNING/ADMINISTRATION	612,170.07
10 ADJUSTMENT TO COMPUTE TOTAL AMOUNT SUBJECT TO LOW/MOD BENEFIT	0.00
11 AMOUNT SUBJECT TO LOW/MOD BENEFIT (LINE 09 + LINE 10)	612,170.07
12 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	144,022.53
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)	756,192.60
16 UNEXPENDED BALANCE (LINE 08 - LINE 15)	728,519.97

PART III: LOWMOD BENEFIT THIS REPORTING PERIOD

17 EXPENDED FOR LOW/MOD HOUSING IN SPECIAL AREAS	0.00
18 EXPENDED FOR LOW/MOD MULTI-UNIT HOUSING	0.00
19 DISBURSED FOR OTHER LOW/MOD ACTIVITIES	612,170.07
20 ADJUSTMENT TO COMPUTE TOTAL LOW/MOD CREDIT	0.00
21 TOTAL LOW/MOD CREDIT (SUM, LINES 17-20)	612,170.07
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	104,668.17
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)	104,668.17
32 ENTITLEMENT GRANT	1,451,253.00
33 PRIOR YEAR PROGRAM INCOME	61,799.67
34 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PS CAP	0.00
35 TOTAL SUBJECT TO PS CAP (SUM, LINES 32-34)	1,513,052.67
36 PERCENT FUNDS OBLIGATED FOR PS ACTIVITIES (LINE 31/LINE 35)	6.92%

PART V: PLANNING AND ADMINISTRATION (PA) CAP

37 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	144,022.53
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)	144,022.53
42 ENTITLEMENT GRANT	1,451,253.00
43 CURRENT YEAR PROGRAM INCOME	33,459.57
44 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PA CAP	0.00
45 TOTAL SUBJECT TO PA CAP (SUM, LINES 42-44)	1,484,712.57
46 PERCENT FUNDS OBLIGATED FOR PA ACTIVITIES (LINE 41/LINE 45)	9.70%



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

No data returned for this view. This might be because the applied filter excludes all data.

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
2023	8	2072	6858373	2023 Place-based Streetscape Improvements	03K	LMA	\$11,943.75
					03K	Matrix Code	\$11,943.75
2021	10	1931	6858373	Neighborhood Crime Reduction through Police Social Worker Program	05I	LMA	\$2,581.39
2021	10	1931	6873106	Neighborhood Crime Reduction through Police Social Worker Program	05I	LMA	\$898.94
2021	10	1931	6938133	Neighborhood Crime Reduction through Police Social Worker Program	05I	LMA	\$7,000.00
2021	10	1931	6956374	Neighborhood Crime Reduction through Police Social Worker Program	05I	LMA	\$7,843.44
					05I	Matrix Code	\$18,323.77
2023	11	2073	6858373	2023 Health & Housing Social Worker	05X	LMC	\$19,680.19
2023	11	2073	6873106	2023 Health & Housing Social Worker	05X	LMC	\$8,325.40
2023	11	2073	6938133	2023 Health & Housing Social Worker	05X	LMC	\$9,397.61
					05X	Matrix Code	\$37,403.20
2022	9	2027	6858373	2022 Public Service City Project Manager (DoNE)	05Z	LMA	\$3,444.21
2023	9	2074	6858373	2023 City Public Service Program Management (DoNE Program Management)	05Z	LMA	\$33,336.23
2023	9	2074	6873106	2023 City Public Service Program Management (DoNE Program Management)	05Z	LMA	\$6,031.14
2023	9	2074	6938133	2023 City Public Service Program Management (DoNE Program Management)	05Z	LMA	\$6,129.62
					05Z	Matrix Code	\$48,941.20
2021	6	2064	6873106	Affordable Housing Development Solutions: Scattered Site Single-Family Rehabilitation	14A	LMH	\$75,951.34
2023	5	2065	6858373	630 S Ann Street	14A	LMH	\$1,276.00
2023	5	2079	6858373	51 Prospect Street	14A	LMH	\$4,180.00
2023	5	2080	6858373	820 Second Street	14A	LMH	\$7,845.00
2023	5	2081	6858373	53 S Marshall Street	14A	LMH	\$8,522.00
2023	5	2082	6873106	527 Lancaster Avenue	14A	LMH	\$11,650.00
2023	5	2083	6873106	546 Hamilton Street	14A	LMH	\$4,905.00
2023	5	2084	6873106	1315 Fremont Street	14A	LMH	\$10,400.00
2023	5	2085	6858373	621 S Christian Street	14A	LMH	\$6,100.00
2023	5	2086	6873106	727 High Street	14A	LMH	\$1,600.00
2023	5	2091	6873106	450 S Ann Street	14A	LMH	\$7,070.00
2023	5	2093	6873106	715 Fourth Street	14A	LMH	\$11,000.00
2023	5	2094	6873106	34 Laurel Street	14A	LMH	\$9,058.25
					14A	Matrix Code	\$159,557.59
2020	9	1849	6858373	Critical Repair and Lead Hazard Reduction Program Admin	14H	LMC	\$14,587.60
2021	4	1934	6858373	Critical Repair and Lead Hazard Reduction Program Admin	14H	LMH	\$423.06
2022	3	2015	6858373	2022 Critical Repair and Lead Hazard Control Program Administration	14H	LMH	\$24,751.43
2022	3	2015	6873106	2022 Critical Repair and Lead Hazard Control Program Administration	14H	LMH	\$1,309.68
2022	3	2015	6938133	2022 Critical Repair and Lead Hazard Control Program Administration	14H	LMH	\$4,858.01
2022	3	2015	6956374	2022 Critical Repair and Lead Hazard Control Program Administration	14H	LMH	\$2,946.25
2023	3	2070	6858373	2023 Critical Repair and Lead Hazard Control Program Admin	14H	LMH	\$22,105.39
2023	3	2070	6873106	2023 Critical Repair and Lead Hazard Control Program Admin	14H	LMH	\$24,826.77
2023	3	2070	6938133	2023 Critical Repair and Lead Hazard Control Program Admin	14H	LMH	\$66,825.01
2023	3	2070	6956374	2023 Critical Repair and Lead Hazard Control Program Admin	14H	LMH	\$44,324.56
					14H	Matrix Code	\$206,957.76
2023	6	2071	6858373	2023 Proactive Housing Code Enforcement	15	LMA	\$92,217.84
2023	6	2071	6873106	2023 Proactive Housing Code Enforcement	15	LMA	\$35,637.64
2023	6	2071	6938133	2023 Proactive Housing Code Enforcement	15	LMA	\$1,064.69
2023	6	2071	6956374	2023 Proactive Housing Code Enforcement	15	LMA	\$122.63
					15	Matrix Code	\$129,042.80
Total							\$612,170.07

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



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	1,124,150.65
06 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	96,406.77
07 DISBURSED IN IDIS FOR SECTION 108 REPAYMENTS	0.00
08 TOTAL EXPENDITURES (SUM, LINES 05 - 07)	1,220,557.42
09 UNEXPENDED BALANCE (LINE 04 - LINE8)	332,381.58

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	1,124,150.65
13 TOTAL LOW/MOD CREDIT (SUM, LINES 10 - 12)	1,124,150.65
14 AMOUNT SUBJECT TO LOW/MOD BENEFIT (LINE 05)	1,124,150.65
15 PERCENT LOW/MOD CREDIT (LINE 13/LINE 14)	100.00%

PART IV: PUBLIC SERVICE (PS) CALCULATIONS

16 DISBURSED IN IDIS FOR PUBLIC SERVICES	738,768.30
17 CDBG-CV GRANT	1,552,939.00
18 PERCENT OF FUNDS DISBURSED FOR PS ACTIVITIES (LINE 16/LINE 17)	47.57%

PART V: PLANNING AND ADMINISTRATION (PA) CAP

19 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	98,218.65
20 CDBG-CV GRANT	1,552,939.00
21 PERCENT OF FUNDS DISBURSED FOR PA ACTIVITIES (LINE 19/LINE 20)	6.32%



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

No data returned for this view. This might be because the applied filter excludes all data.

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

No data returned for this view. This might be because the applied filter excludes all data.

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

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount	
2020	5	1873	6529488	City Health Worker for COVID-19 Support	05M	LMA	\$15,854.72	
			6578570	City Health Worker for COVID-19 Support	05M	LMA	\$15,315.97	
			6601348	City Health Worker for COVID-19 Support	05M	LMA	\$20,766.28	
			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		
		6938133	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$1,120.00		
	2063	6956374	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$1,446.15		
		6983125	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$1,183.20		
		6983131	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$280.00		
		6999890	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$591.60		
		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		
		6938133	Emergency Overnight and Drop-In Day Shelter Program (COVID-19)	03T	LMC	\$2,162.97		
		6983131	Emergency Overnight and Drop-In Day Shelter Program (COVID-19)	03T	LMC	\$4,267.95		
		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	



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Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount	
2020	6	1874	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	
		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
				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							\$1,130,473.40	

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



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Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount	
2020	5	1995	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	
		2032	6717221	6717221	Public Health Services - Mobile Hygiene Unit (Year 1)	05M	LMC	\$4,955.00
				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	
			6938133	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$1,120.00	
	6956374	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$1,446.15			
	6983125	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$1,183.20			
	6983131	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$280.00			
	6999890	Public Health Services - Mobile Hygiene Unit (Year 2)	05M	LMC	\$591.60			
	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
				6938133	Emergency Overnight and Drop-In Day Shelter Program (COVID-19)	03T	LMC	\$2,162.97
				6983131	Emergency Overnight and Drop-In Day Shelter Program (COVID-19)	03T	LMC	\$4,267.95
	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
		6495243	Utility Assistance Program	05Q	LMC	\$768.75		
		6529488	Utility Assistance Program	05Q	LMC	\$9,467.76		
Total							\$738,768.30	

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

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2020	5	2062	6810659	Community Health Needs Assessment - Planning & Administration	20		\$443.64
			6873106	Community Health Needs Assessment - Planning & Administration	20		\$130.59
			6938133	Community Health Needs Assessment - Planning & Administration	20		\$93,187.05
			6956374	Community Health Needs Assessment - Planning & Administration	20		\$2,645.49
			6983125	Community Health Needs Assessment - Planning & Administration	20		\$10.11
			6983131	Community Health Needs Assessment - Planning & Administration	20		\$390.61
			6999890	Community Health Needs Assessment - Planning & Administration	20		\$1,411.16
Total							\$98,218.65

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2024 1	2024 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 administrative costs.	CDBG	\$211,397.09
2	2024 Fair Housing Services Program	In 2024, 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 2024 CDBG dollars will be committed to help fund this program from July 1, 2024 to June 30, 2025. 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.	CDBG	\$20,000.00

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Plan IDIS Year Project	Project Title and Description		Program	Committed Amount
2024 1	2024 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 administrative costs.	CDBG	\$211,397.09
2	2024 Fair Housing Services Program	In 2024, 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 2024 CDBG dollars will be committed to help fund this program from July 1, 2024 to June 30, 2025. 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.	CDBG	\$20,000.00

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2024 1	2024 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 administrative costs.	CDBG	\$0.00
2	2024 Fair Housing Services Program	In 2024, 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 2024 CDBG dollars will be committed to help fund this program from July 1, 2024 to June 30, 2025. 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.	CDBG	\$0.00

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2024 1	2024 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 administrative costs.	CDBG	\$211,397.09
2	2024 Fair Housing Services Program	In 2024, 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 2024 CDBG dollars will be committed to help fund this program from July 1, 2024 to June 30, 2025. 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.	CDBG	\$20,000.00

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2024 1	2024 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 administrative costs.	CDBG	\$0.00
2	2024 Fair Housing Services Program	In 2024, 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 2024 CDBG dollars will be committed to help fund this program from July 1, 2024 to June 30, 2025. 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.	CDBG	\$0.00

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2024 3	2024 Critical Repair and Lead Hazard Reduction Program Administration	<p>This project will help cover administrative costs of the City Lead Hazard Control Program and Critical Repair Program in 2024.</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. Office of Healthy Homes 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>	CDBG	\$194,037.50
4	2024 Critical Repair Program	<p>In 2024, 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.</p>	CDBG	\$112,812.50

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Plan IDIS Year Project	Project Title and Description		Program	Committed Amount
2024 3	2024 Critical Repair and Lead Hazard Reduction Program Administration	<p>This project will help cover administrative costs of the City Lead Hazard Control Program and Critical Repair Program in 2024.</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. Office of Healthy Homes 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>	CDBG	\$194,037.50
4	2024 Critical Repair Program	<p>In 2024, 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.</p>	CDBG	\$112,812.50

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Plan IDIS Year Project	Project Title and Description		Program	Amount Drawn Thru Report Year
2024 3	2024 Critical Repair and Lead Hazard Reduction Program Administration	<p>This project will help cover administrative costs of the City Lead Hazard Control Program and Critical Repair Program in 2024.</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. Office of Healthy Homes 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>	CDBG	\$0.00
4	2024 Critical Repair Program	<p>In 2024, 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.</p>	CDBG	\$0.00

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Plan IDIS Year Project	Project Title and Description		Program	Amount Available to Draw
2024 3	2024 Critical Repair and Lead Hazard Reduction Program Administration	<p>This project will help cover administrative costs of the City Lead Hazard Control Program and Critical Repair Program in 2024.</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. Office of Healthy Homes 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>	CDBG	\$194,037.50
4	2024 Critical Repair Program	<p>In 2024, 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.</p>	CDBG	\$112,812.50

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Plan IDIS Year Project	Project Title and Description		Program	Amount Drawn in Report Year
2024 3	2024 Critical Repair and Lead Hazard Reduction Program Administration	<p>This project will help cover administrative costs of the City Lead Hazard Control Program and Critical Repair Program in 2024.</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. Office of Healthy Homes 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>	CDBG	\$0.00
4	2024 Critical Repair Program	<p>In 2024, 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.</p>	CDBG	\$0.00

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Plan IDIS Year Project	Project Title and Description		Program	Project Estimate
2024 5	2024 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 complaint-based code enforcement actions. The City has committed \$308,509.59 of its 2024 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 2024, 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	\$308,509.59
6	2024 Affordable Housing Development Solutions	SUBSTANTIAL AMENDMENT: Increase Affordable Housing Development Solutions activity within the Increase Affordable Housing Opportunities goal (Matrix Code 14A . IDIS Activity #2064) by \$119,840 from \$147,605 to \$267,445 to meet the continuing community need for affordable housing. The City is prioritizing increasing affordable housing for its community members leveraging all resources available. The City has allocated \$147,604.78 in CDBG entitlement funding to use for furthering this effort in 2024, which will help supplement \$163,551 in remaining 2023 CDBG entitlement funding allocated to this project to help strengthen impact. In 2024, 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	\$264,844.67
7	2024 Place-based Streetscape Improvements	In 2024, 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	\$189,525.00

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IDIS

Plan IDIS Year Project	Project Title and Description	Program	Committed Amount
2024 5	2024 Proactive Housing Code Enforcement	CDBG	\$311,709.59
6	2024 Affordable Housing Development Solutions	CDBG	\$0.00
7	2024 Place-based Streetscape Improvements	CDBG	\$189,525.00

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Plan IDIS Year Project	Project Title and Description	Program	Amount Drawn Thru Report Year
2024 5	2024 Proactive Housing Code Enforcement	CDBG	\$0.00
6	2024 Affordable Housing Development Solutions	CDBG	\$0.00
7	2024 Place-based Streetscape Improvements	CDBG	\$0.00

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IDIS				Amount
Plan IDIS Year Project	Project Title and Description		Program	Available to Draw
2024 5	2024 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 complaint-based code enforcement actions. The City has committed \$308,509.59 of its 2024 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 2024, 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	\$311,709.59
6	2024 Affordable Housing Development Solutions	SUBSTANTIAL AMENDMENT: Increase Affordable Housing Development Solutions activity within the Increase Affordable Housing Opportunities goal (Matrix Code 14A . IDIS Activity #2064) by \$119,840 from \$147,605 to \$267,445 to meet the continuing community need for affordable housing. The City is prioritizing increasing affordable housing for its community members leveraging all resources available. The City has allocated \$147,604.78 in CDBG entitlement funding to use for furthering this effort in 2024, which will help supplement \$163,551 in remaining 2023 CDBG entitlement funding allocated to this project to help strengthen impact. In 2024, 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
7	2024 Place-based Streetscape Improvements	In 2024, 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	\$189,525.00

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IDIS	Plan IDIS Year Project	Project Title and Description	Program	Amount Drawn in Report Year
	2024 5	2024 Proactive Housing Code Enforcement	CDBG	\$0.00
	6	2024 Affordable Housing Development Solutions	CDBG	\$0.00
	7	2024 Place-based Streetscape Improvements	CDBG	\$0.00

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Plan IDIS Year Project	Project Title and Description	Program	Project Estimate
2024 8	2024 City Planning	CDBG	\$67,764.00
	<p>SUBSTANTIAL AMENDMENT: Increase City Planning allocation (Matrix Code 20 IDIS Activity #2068) by \$5,910 from \$58,854 to \$64,764.</p> <p>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.</p>		
9	2024 City Public Service Program Management	CDBG	\$17,249.63
	<p>SUBSTANTIAL AMENDMENT: Reduce the Public Service City Worker Program DoNE in the Promote Neighborhood Quality of Life goal (Matrix Code 05Z IDIS Activity #2115) by \$54,750 (from \$72,000 to \$17,250).</p> <p>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.</p>		
10	2024 Police Social Worker Program	CDBG	\$1,000.00
	<p>SUBSTANTIAL AMENDMENT: Reduce the Neighborhood Crime Reduction through Police Social Worker Position activity (Matrix Code 05I IDIS Activity #1931) by \$71,000 in the Promote Neighborhood Quality of Life goal by \$71,000 (from \$72,000 to \$1,000).</p> <p>In 2024, 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.</p>		

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Plan IDIS Year Project	Project Title and Description	Program	Committed Amount
2024 8	2024 City Planning	CDBG	\$63,350.51
	<p>SUBSTANTIAL AMENDMENT: Increase City Planning allocation (Matrix Code 20 IDIS Activity #2068) by \$5,910 from \$58,854 to \$64,764.</p> <p>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.</p>		
9	2024 City Public Service Program Management	CDBG	\$72,000.00
	<p>SUBSTANTIAL AMENDMENT: Reduce the Public Service City Worker Program DoNE in the Promote Neighborhood Quality of Life goal (Matrix Code 05Z IDIS Activity #2115) by \$54,750 (from \$72,000 to \$17,250).</p> <p>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.</p>		
10	2024 Police Social Worker Program	CDBG	\$72,000.00
	<p>SUBSTANTIAL AMENDMENT: Reduce the Neighborhood Crime Reduction through Police Social Worker Position activity (Matrix Code 05I IDIS Activity #1931) by \$71,000 in the Promote Neighborhood Quality of Life goal by \$71,000 (from \$72,000 to \$1,000).</p> <p>In 2024, 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.</p>		

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Plan IDIS Year Project	Project Title and Description	Program	Amount Drawn Thru Report Year
2024 8	2024 City Planning	CDBG	\$0.00
	<p>SUBSTANTIAL AMENDMENT: Increase City Planning allocation (Matrix Code 20 IDIS Activity #2068) by \$5,910 from \$58,854 to \$64,764.</p> <p>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.</p>		
9	2024 City Public Service Program Management	CDBG	\$0.00
	<p>SUBSTANTIAL AMENDMENT: Reduce the Public Service City Worker Program DoNE in the Promote Neighborhood Quality of Life goal (Matrix Code 05Z IDIS Activity #2115) by \$54,750 (from \$72,000 to \$17,250).</p> <p>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.</p>		
10	2024 Police Social Worker Program	CDBG	\$0.00
	<p>SUBSTANTIAL AMENDMENT: Reduce the Neighborhood Crime Reduction through Police Social Worker Position activity (Matrix Code 05I IDIS Activity #1931) by \$71,000 in the Promote Neighborhood Quality of Life goal by \$71,000 (from \$72,000 to \$1,000).</p> <p>In 2024, 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.</p>		

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IDIS				Amount
Plan IDIS Year Project	Project Title and Description		Program	Available to Draw
2024 8	2024 City Planning	<p>SUBSTANTIAL AMENDMENT: Increase City Planning allocation (Matrix Code 20 IDIS Activity #2068) by \$5,910 from \$58,854 to \$64,764.</p> <p>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.</p>	CDBG	\$63,350.51
9	2024 City Public Service Program Management	<p>SUBSTANTIAL AMENDMENT: Reduce the Public Service City Worker Program DoNE in the Promote Neighborhood Quality of Life goal (Matrix Code 05Z IDIS Activity #2115) by \$54,750 (from \$72,000 to \$17,250).</p> <p>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.</p>	CDBG	\$72,000.00
10	2024 Police Social Worker Program	<p>SUBSTANTIAL AMENDMENT: Reduce the Neighborhood Crime Reduction through Police Social Worker Position activity (Matrix Code 05I IDIS Activity #1931) by \$71,000 in the Promote Neighborhood Quality of Life goal by \$71,000 (from \$72,000 to \$1,000).</p> <p>In 2024, 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.</p>	CDBG	\$72,000.00

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IDIS				Amount
Plan IDIS Year Project	Project Title and Description		Program	Drawn in Report Year
2024 8	2024 City Planning	<p>SUBSTANTIAL AMENDMENT: Increase City Planning allocation (Matrix Code 20 IDIS Activity #2068) by \$5,910 from \$58,854 to \$64,764.</p> <p>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.</p>	CDBG	\$0.00
9	2024 City Public Service Program Management	<p>SUBSTANTIAL AMENDMENT: Reduce the Public Service City Worker Program DoNE in the Promote Neighborhood Quality of Life goal (Matrix Code 05Z IDIS Activity #2115) by \$54,750 (from \$72,000 to \$17,250).</p> <p>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.</p>	CDBG	\$0.00
10	2024 Police Social Worker Program	<p>SUBSTANTIAL AMENDMENT: Reduce the Neighborhood Crime Reduction through Police Social Worker Position activity (Matrix Code 05I IDIS Activity #1931) by \$71,000 in the Promote Neighborhood Quality of Life goal by \$71,000 (from \$72,000 to \$1,000).</p> <p>In 2024, 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.</p>	CDBG	\$0.00

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Plan IDIS Year Project	Project Title and Description	Program	Project Estimate
2024 11	2024 Health and Housing Social Worker Program	CDBG	\$69,113.03
12	2024 Small Business Development (Microenterprise Development)	CDBG	\$20,000.00

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Plan IDIS Year Project	Project Title and Description	Program	Committed Amount
2024 11	2024 Health and Housing Social Worker Program	CDBG	\$69,113.03
12	2024 Small Business Development (Microenterprise Development)	CDBG	\$20,000.00

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Plan IDIS Year Project	Project Title and Description	Program	Amount Drawn Thru Report Year
2024 11	2024 Health and Housing Social Worker Program	CDBG	\$0.00
	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 2024, 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 to furthering the City's goals to utilize CDBG to promote neighborhood quality of life and to also increase access to affordable housing opportunities.		
12	2024 Small Business Development (Microenterprise Development)	CDBG	\$0.00
	In 2024, 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.		

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Plan IDIS Year Project	Project Title and Description	Program	Amount Available to Draw
2024 11	2024 Health and Housing Social Worker Program	CDBG	\$69,113.03
12	2024 Small Business Development (Microenterprise Development)	CDBG	\$20,000.00

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Plan IDIS Year Project	Project Title and Description	Program	Amount Drawn in Report Year
2024 11	2024 Health and Housing Social Worker Program	CDBG	\$0.00
12	2024 Small Business Development (Microenterprise Development)	CDBG	\$0.00

PR26 - Activity Summary by Selected Grant

Date Generated: 03/14/2025

Grantee: LANCASTER

Grant Year: 2024

CARES Act Grants only, Formula and Competitive Grants only

Total Grant Amount for CDBG 2024 Grant year B24MC420010 Grant Number = \$1,451,253.00															
State	Grantee Name	Grant Year	Grant Number	Activity Group	Matrix Code	National Objective	IDIS Activity	Activity to prevent, prepare for, and respond to Coronavirus	Activity Status	Amount Funded From Selected Grant	Amount Drawn From Selected Grant	% of CDBG Drawn From Selected Grant/Grant	Total CDBG Funded Amount (All Years All Sources)	Total CDBG Drawn Amount (All Years All Sources)	
PA	LANCASTER	2024	B24MC420010	Administrative And Planning	20		2108	No	Open	\$58,853.51	\$41,332.61		\$63,350.51	\$45,829.61	
PA	LANCASTER	2024	B24MC420010	Administrative And Planning	21A		2107	No	Open	\$162,450.00	\$1,525.90		\$162,450.00	\$1,525.90	
PA	LANCASTER	2024	B24MC420010	Administrative And Planning	21B		2111	No	Completed	\$48,947.09	\$48,947.09		\$48,947.09	\$48,947.09	
PA	LANCASTER	2024	B24MC420010	Administrative And Planning	21D		2109	No	Open	\$20,000.00	\$9,751.10		\$20,000.00	\$9,751.10	
				Total Administrative And Planning							\$290,250.60	\$101,556.70	7.00%	\$294,747.60	\$106,053.70
PA	LANCASTER	2024	B24MC420010	Economic Development	18C	LMA	2118	No	Open	\$20,000.00	\$0.00		\$20,000.00		
				Total Economic Development							\$20,000.00	\$0.00	0.00%	\$20,000.00	\$0.00
PA	LANCASTER	2024	B24MC420010	Housing	14A	LMH	2095	No	Cancel	\$0.00	\$0.00		\$0.00		
PA	LANCASTER	2024	B24MC420010	Housing	14A	LMH	2096	No	Completed	\$10,008.00	\$10,008.00		\$10,008.00	\$10,008.00	
PA	LANCASTER	2024	B24MC420010	Housing	14A	LMH	2097	No	Cancel	\$0.00	\$0.00		\$0.00		
PA	LANCASTER	2024	B24MC420010	Housing	14A	LMH	2098	No	Completed	\$20,210.00	\$20,210.00		\$20,210.00	\$20,210.00	
PA	LANCASTER	2024	B24MC420010	Housing	14A	LMH	2099	No	Open	\$3,503.00	\$3,503.00		\$3,503.00	\$3,503.00	
PA	LANCASTER	2024	B24MC420010	Housing	14A	LMH	2100	No	Completed	\$14,870.00	\$14,870.00		\$14,870.00	\$14,870.00	
PA	LANCASTER	2024	B24MC420010	Housing	14A	LMH	2101	No	Open	\$23,000.00	\$23,000.00		\$23,000.00	\$23,000.00	
PA	LANCASTER	2024	B24MC420010	Housing	14A	LMH	2102	No	Open	\$2,000.00	\$2,000.00		\$2,000.00	\$2,000.00	
PA	LANCASTER	2024	B24MC420010	Housing	14A	LMH	2103	No	Open	\$6,993.79	\$6,993.79		\$6,993.79	\$6,993.79	
PA	LANCASTER	2024	B24MC420010	Housing	14A	LMH	2104	No	Cancel	\$0.00	\$0.00		\$0.00		
PA	LANCASTER	2024	B24MC420010	Housing	14A	LMH	2105	No	Completed	\$7,350.00	\$7,350.00		\$7,350.00	\$7,350.00	
PA	LANCASTER	2024	B24MC420010	Housing	14A	LMH	2106	No	Completed	\$5,937.71	\$5,937.71		\$5,937.71	\$5,937.71	
PA	LANCASTER	2024	B24MC420010	Housing	14A	LMH	2148	No	Open	\$1,110.00	\$0.00		\$1,110.00		
PA	LANCASTER	2024	B24MC420010	Housing	14A	LMH	2149	No	Open	\$17,830.00	\$0.00		\$17,830.00		
PA	LANCASTER	2024	B24MC420010	Housing	14H	LMH	2112	No	Open	\$194,037.50	\$9,912.30		\$194,037.50	\$9,912.30	
PA	LANCASTER	2024	B24MC420010	Housing	15	LMA	2113	No	Open	\$308,509.59	\$297,624.01		\$311,709.59	\$300,824.01	
				Total Housing							\$615,359.59	\$401,408.81	27.66%	\$618,559.59	\$404,608.81
PA	LANCASTER	2024	B24MC420010	Public Improvements	03K	LMA	2114	No	Completed	\$189,525.00	\$189,525.00		\$189,525.00	\$189,525.00	

Total Public Improvements										\$189,525.00	\$189,525.00	13.06%	\$189,525.00	\$189,525.00
PA	LANCASTER	2024	B24MC420010	Public Services	05I	LMA	2117	No	Open	\$72,000.00	\$0.00		\$72,000.00	
PA	LANCASTER	2024	B24MC420010	Public Services	05X	LMC	2116	No	Open	\$69,113.03	\$69,113.03		\$69,113.03	\$69,113.03
PA	LANCASTER	2024	B24MC420010	Public Services	05Z	LMA	2115	No	Open	\$72,000.00	\$8,086.60		\$72,000.00	\$8,086.60
Non CARES Related Public Services										\$213,113.03	\$77,199.63	5.32%	\$213,113.03	\$77,199.63
Total 2024										\$1,328,248.22	\$769,690.14	53.04%	\$1,335,945.22	\$777,387.14
Grand Total										\$1,328,248.22	\$769,690.14	53.04%	\$1,335,945.22	\$777,387.14

PR26 - Activity Summary by Selected Grant

Date Generated: 03/14/2025

Grantee: LANCASTER

Grant Year: 2024

Formula and Competitive Grants only

Total Grant Amount for CDBG 2024 Grant year B24MC420010 Grant Number = \$1,451,253.00															
State	Grantee Name	Grant Year	Grant Number	Activity Group	Matrix Code	National Objective	IDIS Activity	Activity to prevent, prepare for, and respond to Coronavirus	Activity Status	Amount Funded From Selected Grant	Amount Drawn From Selected Grant	% of CDBG Drawn From Selected Grant/Grant	Total CDBG Funded Amount (All Years All Sources)	Total CDBG Drawn Amount (All Years All Sources)	
PA	LANCASTER	2024	B24MC420010	Administrative And Planning	20		2108	No	Open	\$58,853.51	\$41,332.61		\$63,350.51	\$45,829.61	
PA	LANCASTER	2024	B24MC420010	Administrative And Planning	21A		2107	No	Open	\$162,450.00	\$1,525.90		\$162,450.00	\$1,525.90	
PA	LANCASTER	2024	B24MC420010	Administrative And Planning	21B		2111	No	Completed	\$48,947.09	\$48,947.09		\$48,947.09	\$48,947.09	
PA	LANCASTER	2024	B24MC420010	Administrative And Planning	21D		2109	No	Open	\$20,000.00	\$9,751.10		\$20,000.00	\$9,751.10	
				Total Administrative And Planning							\$290,250.60	\$101,556.70	7.00%	\$294,747.60	\$106,053.70
PA	LANCASTER	2024	B24MC420010	Economic Development	18C	LMA	2118	No	Open	\$20,000.00	\$0.00		\$20,000.00		
				Total Economic Development							\$20,000.00	\$0.00	0.00%	\$20,000.00	\$0.00
PA	LANCASTER	2024	B24MC420010	Housing	14A	LMH	2095	No	Cancel	\$0.00	\$0.00		\$0.00		
PA	LANCASTER	2024	B24MC420010	Housing	14A	LMH	2096	No	Completed	\$10,008.00	\$10,008.00		\$10,008.00	\$10,008.00	
PA	LANCASTER	2024	B24MC420010	Housing	14A	LMH	2097	No	Cancel	\$0.00	\$0.00		\$0.00		
PA	LANCASTER	2024	B24MC420010	Housing	14A	LMH	2098	No	Completed	\$20,210.00	\$20,210.00		\$20,210.00	\$20,210.00	
PA	LANCASTER	2024	B24MC420010	Housing	14A	LMH	2099	No	Open	\$3,503.00	\$3,503.00		\$3,503.00	\$3,503.00	
PA	LANCASTER	2024	B24MC420010	Housing	14A	LMH	2100	No	Completed	\$14,870.00	\$14,870.00		\$14,870.00	\$14,870.00	
PA	LANCASTER	2024	B24MC420010	Housing	14A	LMH	2101	No	Open	\$23,000.00	\$23,000.00		\$23,000.00	\$23,000.00	
PA	LANCASTER	2024	B24MC420010	Housing	14A	LMH	2102	No	Open	\$2,000.00	\$2,000.00		\$2,000.00	\$2,000.00	
PA	LANCASTER	2024	B24MC420010	Housing	14A	LMH	2103	No	Open	\$6,993.79	\$6,993.79		\$6,993.79	\$6,993.79	
PA	LANCASTER	2024	B24MC420010	Housing	14A	LMH	2104	No	Cancel	\$0.00	\$0.00		\$0.00		
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PA	LANCASTER	2024	B24MC420010	Housing	14A	LMH	2148	No	Open	\$1,110.00	\$0.00		\$1,110.00		
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PA	LANCASTER	2024	B24MC420010	Public Services	05X	LMC	2116	No	Open	\$69,113.03	\$69,113.03		\$69,113.03	\$69,113.03
PA	LANCASTER	2024	B24MC420010	Public Services	05Z	LMA	2115	No	Open	\$72,000.00	\$8,086.60		\$72,000.00	\$8,086.60
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Grand Total										\$1,328,248.22	\$769,690.14	53.04%	\$1,335,945.22	\$777,387.14



LANCASTER COUNTY PA-510 CONTINUUM OF CARE STANDARDS & PROCEDURES

September 26, 2023

Document Revision History

Original Standards approved July 2, 2015

Update approved by the LCHRA Board on September 26, 2023
and by the Steering Committee on September 13, 2023

Update approved September 11, 2019

Update approved July 10, 2018

Update approved April 7, 2016

These standards and procedures will be reviewed at least annually, and any necessary amendments will be made to reflect changes in regulations, best practices, or community needs.

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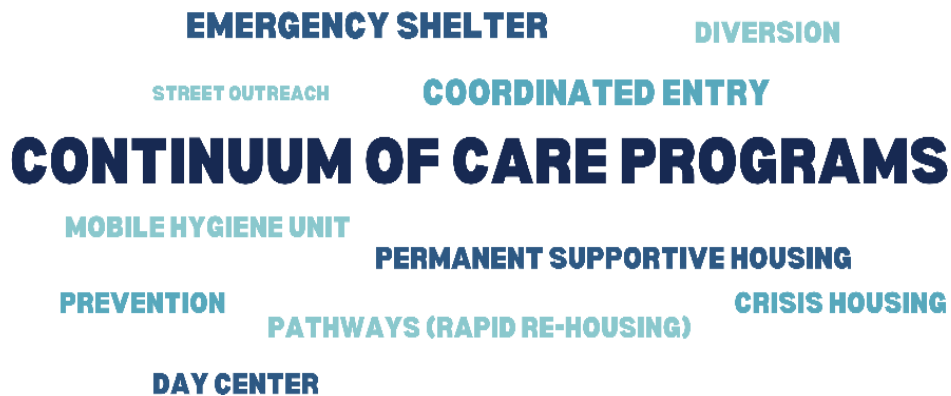
Introduction of Continuum of Care

The purpose of the Lancaster County Continuum of Care (CoC) is to lead a community-wide effort to address homelessness and housing insecurity.

For nearly two decades Lancaster County has worked diligently to address the needs of the community members, including unsheltered individuals and housing insecure. The Lancaster CoC is comprised of local agencies representing education, health, behavioral health, social services, homeless service providers, substance treatment, city and county government, and faith-based organizations. The CoC is responsible for carrying out the specific duties outlined by the Federal Department of Housing and Urban Development (HUD) CoC Program Interim Rule found [here](#).



As the spearhead entity for the CoC, the Office for the Coalition (O4C) supports the work of the CoC by guiding the homeless service delivery system efforts, monitoring programs, maintaining communication across the homeless network system of providers, analyzing local data trends to determine needs for service delivery and flow, increasing funding for CoC services, and providing professional development opportunities for homeless service providers. HUD required roles planning, HMIS lead, and funding recipient. The O4C is supported by the Lancaster County Housing & Redevelopment Authorities which employs the staff to complete the tasks with and on behalf of the CoC. As a local community, the CoC is commonly referred to as the “Lancaster County Homelessness Coalition”.



Fundamentals of the Continuum of Care

Our Vision - A sustained, safe, and quality home for all who are experiencing or at risk of homelessness in Lancaster County.

Our Mission - Together the Coalition provides quality, personalized human and housing services for all individuals and families facing or experiencing homelessness, and ensures homelessness is rare, brief, and non-recurring.

Our Core Values

- **Client-Centered:** Place the client first, always! Serve people experiencing homelessness with respect and dignity and empower them to strive and reach their objectives.
- **Bias Towards Action:** Deliver collaborative initiatives through orchestrated actions that accelerate clearly defined published goals.
- **Be Authentic:** Expect open communication and transparency to foster trusting relationships and value interactions that embrace diversity of thought.
- **Value Our People:** Live in a culture where our partners, employees, and volunteers are encouraged and motivated to achieve excellence.
- **Foster Community Ownership:** People experiencing homelessness are valued members of our community: collectively we need to come together as good neighbors to support and empower them.

Six Principles of Practice

- **All Homeless:** Expand services and delivery to address ALL homelessness across the entire county.
- **Client-Centered:** Instill a client-centered ethos to meet individual needs and bridge gaps across system silos and existing policy.
- **Holistic:** Seek holistic system impact to address systemic elements with efficiency and economic proficiency.
- **Collaboration:** Embrace a coalition of many and move towards an integrated model with collaborations across providers and systems.
- **Data-Based:** Plan, operate and manage with precision with comprehensive and consistent data and evident based decision making.
- **Community Commitment:** Foster community ownership beyond engagement to aid in delivery, increase volunteerism and attract outside funding.

While the mission, vision, core values, and six principles of practice were developed during the CoC's Strategic Plan (2019), the veracity held true in 2023. By way of background, the O4C was transferred from Penn Medicine/LGH to the Lancaster County Housing & Redevelopment Authorities via a contractual agreement dated April 1, 2022.

Guided by Homelessness Coalition Steering Committee

To help steer the CoC efforts the Lancaster County Homelessness Coalition Steering Committee provides a community-wide and functioning leadership to support and guide the O4C. The 17 committee members, including individuals with homelessness lived-expertise, represent a wide-range of organizations across Lancaster County including municipal, private, non-profit, education, and faith-based.

The Steering Committee's purpose includes:

- Assisting with strategic direction for the Office for the Coalition (O4C) and CoC,
- Providing fundraising efforts to expand resources,
- Advocating on behalf of the efforts of the Coalition,
- Partnership development to serve the community,
- Overseas as community driven process for the NOFO and Joint Funding Application, and
- Makes recommendations to the Lancaster County Redevelopment Board for approval.

As a community effort, Lancaster County continues to embrace all individuals to assist with meeting the arising needs of homelessness county-wide.

Purpose of the Standards and Policies

Lancaster County Homelessness Coalition Standards and Policies assembles the federally imposed requirements and locally established practices and policies implemented to ensure agencies can meet their responsibilities within the Continuum of Care. All providers engaging in homelessness and/or housing insecure services whether or not recipients of government grant funds should adhere to this document.

At least annually the O4C staff will meet with contracted service providers. This monitoring visit will provide technical support and guidance to improve performance standards. Organizations must show the efforts that they have undertaken to meet the standards. If the organization continues to fail to meet the performance standards established herein, despite technical assistance, funding reductions in future applications will occur.

Frameworks of Practice

Client Involvement

Projects are expected to engage clients with lived experience in ongoing program evaluation and quality improvement processes. At a minimum each project is required to survey clients/residents and/or complete documented interviews with current clients at least annually to obtain feedback on program service quality, the service/housing environment, and opportunities for improvement.

Continued Education for Children

The PA-510 Lancaster City/County CoC Education Policy ensures system wide consistency for implementation of the HEARTH Act for providers to guarantee that children are enrolled in school and connected with community resources including early childhood education.

- Each provider organization must identify a liaison within their organization to be responsible to disseminate information to parents with children to ensure that all school age children are enrolled in school by completing the CoC district notification form that is then sent to the Homeless Student Liaison in the district in which the shelter is located.

- At intake into a shelter, each parent is provided a packet of information on rights to education provided by the McKinney-Vento Act as well as contact information on all available early childhood education programs.

Cultural Competency

All homeless service providers (funded by HUD CoC, ESG and CDBG, United Way, and PA Homeless Assistance Funds) must have established cultural competency policies that provides for at least yearly training for staff that:

- Values diversity,
- Has the capacity for cultural self-assessment,
- Is conscious of the dynamics inherent when cultures interact,
- Includes institutionalized culture knowledge, and
- Developed adaptations to service delivery reflecting an understanding of cultural diversity.

Equal Access

Regulations are established to prevent discrimination and ensure that all individuals have an equal opportunity to secure housing, irrespective of their race, color, religion, national origin, sex, disability, or familial status. Practices such as denying housing, setting different terms or conditions, or providing unequal services based on protected characteristics are strictly prohibited.

The "Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity" rule, introduced by the U.S. Department of Housing and Urban Development (HUD) and published in the Federal Register on September 3, 2012, ensures that individuals can access housing and programs administered by HUD without facing discrimination based on their sexual orientation or gender identity.

Building upon the 2012 regulation the "Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs" rule introduced by the U.S. Department of Housing and Urban Development (HUD) in 2016 emphasizes that recipients and subrecipients of HUD's Community Planning and Development (CPD) funding, along with owners, operators, shelter managers, building and facilities managers, and service providers, grant equal access for individuals based on their gender identity.

By safeguarding fair housing opportunities, these regulations play a vital role in promoting inclusive communities, combating housing disparities, and equal rights for all individuals in their search for safe and suitable housing.

Adherence to these regulations is expected from all service organizations within the PA-510 Continuum of Care (CoC) whether or not they receive funding in full or in part, through various sources such as the Community Development Block Grant Programs (CDBG), Continuum of Care (CoC) grants, Emergency Solutions Grant (ESG), Housing Assistance Programs (HAP), United Way, and other funding streams overseen by the O4C.

Housing First

All projects funded with CoC, ESG, CDBG, HAP and United Way funds shall adopt the Housing First philosophy. Housing First is a proven method of ending all types of homelessness and is the most effective approach to ending chronic homelessness. Housing First offers individuals and families experiencing homelessness immediate access to permanent affordable, or supportive housing, without clinical prerequisites like completion of a course of treatment or evidence of sobriety and with a low threshold for entry.

HUD Requirements

All HUD Program funded projects are expected to be familiar with and adhere to all HUD requirements as described in the CoC and ESG Program Interim Rule, applicable Notices, and HUD Program NOFO(s) under which the project is funded. This includes, but is not limited to:

- Participant eligibility.
- Prioritization.
- Allowable activities and costs.
- Matching requirements.
- Calculating occupancy charges and rent.
- Displacement, relocation, and acquisition.
- Timeliness standards.
- Limitations on use of funds.
- Limitations on use of grant funds to serve persons defined as homeless under other federal laws.
- Termination of assistance to program participants.
- Fair Housing and Equal Opportunity.
- Conflicts of interest.
- Program income.
- Recordkeeping requirements.
- Grant and project changes.
- Other applicable federal requirements as explained in the CoC Program Interim Rule.

Mainstream Benefits and Resources

Project providers will ensure that all households they are working with are screened for and referred to all mainstream resources they may be eligible for. Notation of these referrals and any necessary follow-up will be entered in Empower Lancaster. (See Appendix A)

Performance Targets by Population and Program Type

CoC and ESG-funded programs must fully participate in Lancaster's Homeless Management Information System (HMIS) known as Empower Lancaster. All performance targets will be derived from HMIS data. See the table below for by project performance measures for the current year. Programs that are specifically forbidden to use the local HMIS by other statutes or regulations (domestic violence services) cannot participate but must collect the HMIS required data in a comparable database. The Office for the Lancaster County Homelessness Coalition (O4C) is the System Administrator for the HMIS and will assist organizations with HMIS requirements and access.

Plain Language

All policies provided to clients and all forms signed by clients must be tested for and pass "plain

language” testing and be available in both English and Spanish. Guidance on how to test policies can be located here: <https://www.plainlanguage.gov/>

Project Rejection/Denial Policies

PA 510 CoC homeless service providers and facilities must adopt policies outlining the acceptable reasons a client referred to a project can be rejected/denied access by that project. Each organization must submit their policy to the Office for the Homelessness Coalition for approval annually by July 1st of each year. Any revisions or changes to project policies must be submitted to and approved by the O4C.

Security & Confidentiality Policies

The address or location of any housing or rental units of any program participant, including youth, individuals living with HIV/AIDS, victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing will not be made public, except as provided under a preexisting privacy policy of the provider and consistent with state and local laws regarding privacy and obligations of confidentiality with written authorization of the person responsible for the operation of the rental unit.

Termination of Services

- Providers may terminate assistance to a program participant who violates program requirements or conditions of occupancy if they have a written policy that explains program rules and the termination process. Providers must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.
- Providers must demonstrate purposeful and intentional engagement with clients to remedy conflicts, disagreements, or expectations. (Empower Lancaster case notes are mandatory to support termination.)
- The agency's Termination Policy must include "due process" procedures. At a minimum, the procedures must consist of:
 - Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance;
 - Written notice to the program participant containing a clear statement of the reasons for termination;
 - A minimum and reasonable notice period for program termination appropriate in length for the nature of the service being provided;
 - A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision;
 - Prompt written notice of the final decision to the program participant; and
 - When terminating hard-to-house populations programs must exercise judgment and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that a program participant's assistance is terminated only in the most severe cases.
- Termination under this section does not bar the recipient or subrecipient from providing further assistance at a later date to the same family or individual.
- All considerations should be fair, reasonable, and equitable to the participant and agency.

Fair Housing

The Fair Housing Act promotes equal access to housing opportunities for all individuals, regardless of their background or characteristics, and seeks to eliminate discrimination in housing. The O4C expects services providers to be familiar with and adhere to The Fair Housing Act. All programs are to be designed and implemented in a way that is both equitable and accessible.

By adhering to the Fair Housing Act, the Lancaster County CoC ensures that individuals seeking housing or housing-related services within their jurisdiction are protected from discriminatory practices. These practices include refusing to rent or sell housing, setting different terms or conditions, providing different services or facilities, or falsely denying the availability of housing based on the protected characteristics outlined in the Fair Housing Act.

Service providers should take steps to educate their clients on rights and remedies available to them in circumstances of discrimination related to housing, participation in housing programs and/or receiving benefits. The Housing Rights and Resources Center (HRRRC) at Tenfold provides educational services and materials in addition to handling inquiries and assisting individuals in filing Fair Housing complaints.

Discrimination Based on Race, Color, or National Origin

Recipients of federal funding cannot exclude people from participating in their programs based on race, color or national origin as per [U.S.C. § 2000d](#).

Racism and homelessness are interconnected. People of color are often overrepresented in the population of homeless individuals in proportion with the general population. Racial discrimination includes discrimination based on physical characteristics associated with a particular race, such as hair texture, facial features and hair color. Race is not synonymous with color, though they may be related.

National origin discrimination includes discrimination based on the physical, cultural, or linguistic characteristics of persons from a foreign geographic area. Recipients of federal funding are required to take reasonable steps to ensure their programs and activities are accessible to individuals with limited ability to write, speak or understand English. Reasonable steps to accommodate those with limited English proficiency (LEP) include things like:

- Oral interpretation services;
- Bilingual staff;
- Telephone-based or electronic interpreting services;
- 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

HUD encourages recipients of federal funding to use individuals professionally trained to interpret and translate whenever possible to ensure accuracy. LEP individuals in programs receiving federal funding should not have to rely on informal interpreters, including family members, to communicate with staff and other program participants.

Discrimination Based Upon Religion

Programs cannot refuse to serve individuals based on their religious beliefs. It is illegal for programs to require religious activity or a set of religious beliefs to participate in a program. A faith-based organization that participates in a HUD program or activity supported with Federal financial assistance

retains its independence and may continue to carry out its mission, including the practice and expression of religious beliefs, provided that it does not use direct Federal financial assistance that it receives to support or engage in any explicitly religious activities (including activities that involve overt religious content such as worship, religious instruction, or proselytization), or in any other manner prohibited by law. If an organization engages in explicitly religious activities, they must be offered separately from the programs or activities supported by direct Federal financial assistance and participation in these religious activities must be voluntary.

[Discrimination Based on Sex](#)

Fair housing mandates that individuals should not be treated differently in housing based on their sex or gender. These practices include refusing to rent or sell housing, setting different terms or conditions, providing false information about availability, steering individuals to certain neighborhoods based on sex, and sexual harassment in housing. This means that landlords, property managers, real estate agents, lenders, and other housing providers cannot make decisions about housing based on a person's sex or gender.

[Discrimination Based on Disability](#)

Federal nondiscrimination laws define a person with a disability as any (1) individual with a physical or mental impairment that substantially limits one or more major life activities; (2) individual with a record of such impairment; or (3) individual who is regarded as having such an impairment. The legal definition of "person with a disability" does not include current users of illegal substances but does provide protection for individuals with ongoing drug or alcohol addiction. These individuals are still protected by discrimination based on their addiction if the program or activity in question is providing health or rehabilitation services for addiction.

Section 504 of the Rehabilitation Act of 1973 states that no qualified individual with disabilities should, solely by reason of their disability, be excluded from participating, be denied benefits, or be subjected to discrimination under any program receiving federal financial assistance. Titles II and III of the Americans with Disabilities Act states that service providers must make reasonable accommodations for people with disabilities to facilitate equal opportunities for participation in their programs. More information about reasonable accommodations for public places can be found in Title III under [Part 36 Nondiscrimination on the Basis of Disability in Public Accommodations and Commercial Facilities](#).

General Standards for All Programs

Provider Expectations

In addition to these Standards, Lancaster County homeless service providers are expected to:

- Attend the biannual HUD required Continuum of Care meetings,
- Adhere to the CoC prioritization policies,
- Actively participate in the HUD required annual Point in Time and Housing Inventory Counts,
- Align to these standards and policies,
- Enter client data into Empower Lancaster, and
- Extend services during weather related emergencies, as set forth by the O4C.

HUD Defined Homeless Categories

The HUD category definitions and recordkeeping requirements are in Appendix (D) HUD Criteria for Defining Homeless and Recordkeeping Requirements.

Homelessness Verification

HUD requires all recipients and subrecipients to document a household's eligibility for services at program entry. A current Homelessness Verification document, as defined in the context of the PA-510 CoC, should be uploaded in Empower Lancaster and dated within 14 days of the program enrollment date. If a current HV document is not already on file, it is the responsibility of the provider to obtain the client's signature to verify their homeless status and subsequently upload the document to Empower Lancaster.

There are three ways of documenting a person's homeless status:

Third Party Documentation

- Third Party Source
 - Pre-existing records (i.e., institutional records stating the beginning and end dates).
- Third Party Written
 - Letter from the housing owner or lessee stating the individual or family can no longer reside at the current address, or
 - Written observation from individual who witnessed person sleeping unsheltered.
- Third Party Oral
 - From relevant third-party provider (i.e., local law or emergency services), must be documented by staff.

Intake Worker Observation

- Third Party Documentation must be attempted first.
- Staff verifies status based on observation, program record or HMIS record.

Client Self-Certification Used as the last option!

- Third Party Documentation and Intake Worker Observations must be attempted first.
- Signed statement by the individual or head of household seeking assistance indicating they are homeless, without appropriate housing options, and lack resources to obtain immediate housing.

A copy of the current PA-510 Homelessness Verification forms, which outlines the HUD homeless categories utilized for individuals in Lancaster County are available in Appendix (C) of this document.

Prioritization

The PA-510 prioritization policy is incorporated into this document and all CoC programs must follow this policy. A list of households who have been prioritized for services is managed by the O4C in connection with contracted outreach and shelter providers.

The HEARTH Act requires the Lancaster County Continuum of Care (CoC) to have written policies and procedures that govern the provision of assistance to individuals and families under the federally funded Continuum of Care programs in the City of Lancaster and the surrounding Lancaster County (24 CFR 576.400(e)). One of the policies within these performance standards and policies is the assistance in prioritizing individuals for service and housing based on their need.

First Priority: Homeless Individuals and Families with a Disability with the Most Severe Service Needs. An Individual or family that is eligible for CoC Program-funded PSH who has been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter for any period of time, including persons exiting an institution where they have resided for 90 days or less, but were living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately prior to entering the institution and has been identified as having the most severe service needs.

Second Priority: Homeless Individuals and Families with a disability with a Long Period of Continuous or Episodic Homelessness. An Individual or family that is eligible for CoC Program-funded PSH who have been living or residing in a place not meant for human habitation, safe haven, or in an emergency shelter continuously for at least 6 months or on at least three separate occasions in the last 3 years where the cumulative total is at least 6 months. This includes persons exiting an institution where they have resided for 90 days or less but were living or residing in a place not meant for human habitation, a safe haven, in an emergency shelter immediately prior to entering the institution and had been living or residing in one of those locations for at least 6 months or on at least three separate occasions in the last 3 years where the cumulative total is at least 6 months.

Third Priority: Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Havens, or Emergency Shelters. An individual or family is eligible for CoC Program-funded PSH who has been living in a place not meant for human habitation, a safe haven, or an emergency shelter. This includes persons exiting an institution where they have resided for over 90 days or less but were living or residing in a place not meant for human habitation, safe haven, or in an emergency shelter immediately prior to entering the institution.

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

Eligibility

All

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

Emergency Shelter

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

Transitional Housing

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

Rapid Re-housing

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

Permanent Supportive Housing (PSH)

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

Targeting

Transitional housing

- No income, *or*

- 2 or more homeless episodes in the past 3 years (defined as an exit from the homeless system of at least 30 days), *or*
- Coming from treatment program but homeless prior to entering treatment

Permanent Supportive Housing

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

Rapid Re-housing

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

Note: The O4C anticipates changes in the prioritization language to be launched October 2, 2023, that will supersede what is included here.

Chronically Homeless

Per [24 CFR Parts 91 and 578](#), a chronically homeless individual is defined as a person with a disability who lives either in a place not meant for human habitation, a safe haven, or in an emergency shelter, or in an institutional care facility if the individual has been living in the facility for fewer than 90 days and had been living in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately before entering the institutional care facility.

To meet the definition, the individual must have been living as described above continuously for at least 12 months, or on at least four separate occasions in the last 3 years, where the combined occasions total a length of time of at least 12 months. Each period separating the occasions must include at least 7 nights of living in a situation other than a place not meant for human habitation, in an emergency shelter, or in a safe haven. Additionally, the individual must have a disabling condition, described by HUD as “a diagnosable substance use disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments resulting from a brain injury, or chronic physical illness or disability.”

Chronically homeless families are families with adult heads of household who meet the definition of a chronically homeless individual. If there is no adult in the family, the family would still be considered chronically homeless if a minor head of household meets all the criteria of a chronically homeless individual. A chronically homeless family includes those whose composition has fluctuated while the head of household has been homeless.

Grant recipients and subrecipients are required to maintain and follow written intake procedures to ensure compliance with the chronically homeless definition. The procedures must establish the order of priority for obtaining evidence as third-party documentation first, intake worker observations second, and certification from the individual seeking assistance third. At least 75% of households served in an operating year must have 3rd party documentation for 9 of 12 months of homelessness and self-certification may be used for the remaining months.

Providers must complete the Empower Lancaster data elements related to chronic homelessness. These elements are found in the HUD Universal Assessment, included in the intake and assessment workflow for all housing projects in EL. Training on the use of the HUD Universal Assessment is available from O4C in video format.

Income Assessment

Under the specified program guidelines, providers are required to collect certain information and update it in Empower Lancaster at least once a year. This information includes income, benefits receipt, and employment status. Additionally, any other significant changes like the development of a disabling condition or a change in household composition should be recorded during these updates if they haven't been previously recorded.

In cases where there has been a change in household income (e.g., three consecutive paychecks or an increase in mainstream benefits), it is necessary to update the client's Empower Lancaster file immediately upon being notified of the change. This update should be completed within 30 days of receiving the notification, ensuring that the information in the system remains accurate and up to date.

It is important to comply with these requirements to ensure that the program has the most current and relevant information about the household's circumstances, allowing them to receive appropriate benefits and support.

Data

The Lancaster County PA-510 CoC uses Empower Lancaster as its HUD-required Homeless Management Information System (HMIS) and sets data quality standards for homelessness services within the CoC.

Data quality is a term that refers to the reliability and validity of client-level data collected in the Empower Lancaster (EL) Homeless Management Information System (HMIS). It is measured by the extent to which the client data in the system reflects actual information in the real world, and the completeness with which that data is captured. With good data quality, the PA-510 CoC can tell the story of the population experiencing homelessness. High quality data satisfies funder requirements and helps to inform public relations and communication, fundraising, and good policymaking.

Universal Data Elements describes data points taken about every client in HMIS. These data points describe the client (name, date of birth, gender) as well as the client's interactions with the homeless service system (project start date, prior living situation, exit destination). HUD's 2022 Data Standards include fifteen Universal Data Elements:

Universal Identifier Elements (One and Only One per Client Record)

- 3.01 Name
- 3.02 Social Security Number
- 3.03 Date of Birth
- 3.04 Race
- 3.05 Ethnicity
- 3.06 Gender
- 3.07 Veteran Status

Universal Project Stay Elements (One or More Value(s) Per Client or Household Project Stay)

- 3.08 Disabling Condition
- 3.10 Project Start Date
- 3.11 Project Exit Date
- 3.12 Destination
- 3.15 Relationship to Head of Household
- 3.16 Client Location
- 3.20 Housing Move-In Date
- 3.917 Prior Living Situation

Some elements are program specific. For instance, 3.20 Housing Move-In Date is specific to Rapid Rehousing programs. Some elements are associated only with program entry or exit. For instance, 3.12 Destination is only a part of exit assessments. Workflows in Empower Lancaster are designed to capture the correct data elements at the correct time.

PA-510's Data Quality Plan has four components: Timeliness, completeness, accuracy, and monitoring.

1. Timeliness – entering data into the system in a timely manner reduces data errors. This also ensures that data is accessible when needed by other users and the Office for the Lancaster County Homelessness Coalition (O4C).

- Benchmarks for Timeliness:
 - o Emergency Shelter Programs: All Universal Data Elements and relevant HUD required assessments entered within 72 hours of intake/program exit.
 - o Transitional Housing: All Universal Data Elements and relevant HUD required assessments entered within 72 hours of intake/program exit.
 - o Outreach Programs: Basic Universal Identifier Elements entered within 72 hours of initial contact (e.g., name and date of birth). Data elements must be sufficient to identify clients for the purposes of deduplication. Having basic client data also allows users to determine if the client already has a record in EL. Upon engagement for further services or three contacts, the remaining HUD required data elements and assessments should be entered within 72 hours.
 - o Rapid Re-Housing and Supportive Services Only Programs: All Universal Data Elements and relevant HUD required assessments entered within 72 hours of intake/program exit.
 - o Coordinated Assessment Programs: All Universal Data Elements and relevant HUD required assessments entered within 72 hours of intake/program exit.
 - o Case Notes and all Program Services (including shelter bed-nights) should be entered within 72 hours of client contact/service provided.
 - o Service providers should immediately contact O4C via email when an HMIS authorized user is no longer employed by the provider to prevent unauthorized access to consumer information.

2. Completeness – entering data into HMIS so that none of the required data points have missing or incomplete data e.g., missing digits of SSN, misspellings, Data Not Collected, etc.

- Benchmarks for Completeness:
 - o The goal of the Office for the Coalition is to collect 100% of all data elements. However, the O4C recognizes that this is not always possible in some instances. The acceptable data error rates, by program type, are between 0 and 20%, and 0% Missing/Null data (measured with Data Quality Report in Empower Lancaster).
 - o Complete data is crucial to fully understand the demographic characteristics and service use of persons utilizing the programs/services in Lancaster County. Complete data allows for confident reporting and data analysis on the nature and extent of homelessness in Lancaster County, such as:
 - Unduplicated counts of clients served.
 - Patterns of use for people entering/existing services.
 - Evaluation of program/system effectiveness.
 - o Complete data also helps O4C to meet compliance requirements set forth in funding agreements, by reporting on things such as system percentages of missing/null data. It allows the PA-510 CoC to report its success to funders in support of future grant opportunities.
 - In addition to the HUD required data, O4C has also set some standards for a complete client file. The following items are required in every Head of Household (HoH) file within HMIS, unless otherwise specified.
 - o Release of Information forms can either be saved as an uploaded document or a case note template and are valid for 3 years.
 - o Homeless Verification Forms must be uploaded within 72 hours of a client seeking housing related services (outside of Emergency Shelters, Outreach or CHART Coordinated Assessment).
 - o Rapid Re-Housing requires financial assessments every three months while providing financial assistance to clients (this applies to all household members over 18 years of age).
 - o Changes in income should be accompanied by uploaded verification on (household members over 18 years of age).
 - o Changes in address should be noted on the client demographics (and updated for all household members).
 - o Case Notes should be completed.
 - o Services should be logged.
3. Accuracy – all data entered into HMIS needs to be valid, i.e., it needs to accurately represent information collected by users. The data in HMIS needs to be the best possible representation of clients and the programs serving them.

- All data entered into HMIS must be a reflection of information provided by the client, as documented by the intake worker, or otherwise updated by the client and documented for reference. Intentionally recording inaccurate information is strictly prohibited and grounds for HMIS access being revoked.
- To ensure the most accurate data, programs should review active clients' information on a monthly basis and update records as needed.

4. Monitoring – the Office for the Coalition, as the HMIS lead agency, will monitor programs' HMIS activities and data quality based on the above benchmarks. O4C recognizes that data produced by the HMIS is critical to meet the reporting and compliance requirements of individual programs and the wider CoC. As such, all HMIS programs are expected to meet the data quality benchmarks described in this document.

To achieve this, HMIS data will be monitored in order to identify and resolve issues that crop up related to Timeliness, Completeness or Accuracy of all data. All monitoring will be done according to the Data Quality Monitoring Plan and will happen at least annually.

Incentives and Enforcement

- All program administrators must ensure that the Universal Data Elements and other HUD required assessment data are being completed in HMIS in such a way that the data meets the standards laid out in the Data Quality Plan.
- Programs that do not adhere to the Data Quality Plan will be warned of their deficiencies and given training on how to correctly enter data into HMIS.
- Programs that receive two consecutive warnings yet continue to default will have HMIS access suspended until such time that O4C is presented with a plan to correct the data entry errors and maintain data quality that meets the standards laid out in the Data Quality Plan

Length of Time on Streets (Adults & HoH)	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Domestic Violence History (Adults & HoH)	15%	15%	15%	15%	15%	0%	0%	0%	0%	0%
Income at Entry (Adults & HoH)	5%	0%	0%	0%	5%	0%	0%	0%	0%	0%
Missing Annual Assessments (Adults)	N/A	N/A	N/A	N/A	10%	0%	0%	0%	0%	0%
Non-Cash Benefits	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%

Annual System Performance Measures

System Performance Measures (SPM) are one of the primary ways in which federal funders assess the success of Lancaster County’s homeless response system. They are submitted after the end of each HUD fiscal year. The table below expresses these measures as goals, along with the relevant program type and the measure’s location on the Empower Lancaster SPM report.

(Reporting period: document uses HUD’s fiscal year to match annual System Performance Measures – Oct. 1 – Sept. 30)

Program Type	Performance Goal	Source
ES, TH	Reduce average Length of Time Homeless from previous year	Metric 1a
ES, TH	Reduce median Length of Time Homeless from previous year	Metric 1a
ES, TH, PH-RRH, PH-PSH	80% of all exits are to permanent destinations (programmatic goal)	Metric 7b.1
ES, TH, PH-RRH, PH-PSH	40% of all exits across the CoC are to permanent destinations (system-wide goal)	Metric 7b.1
SO	60% of all exits are to successful destinations (institution and permanent housing)	Metric 7a.1
ES, TH, PH-RRH, PH-PSH	Percentage of adults exiting programs will increase from previous year	Metric 4.6
SO, ES, TH, PH	Reduce percentage of people who return to homelessness within 6 months after exiting to permanent housing (during the 2 years previous to the reporting period)	Metric 2
SO, ES, TH, PH	Reduce percentage of people who return to homelessness within 6-12 months after exiting to permanent housing (during the 2 years previous to the reporting period)	Metric 2
SO, ES, TH, PH	Reduce percentage of people who return to homelessness within 12-24 months after exiting to permanent housing (during the 2 years previous to the reporting period)	Metric 2
ES, TH, PH	Reduce the number of people who enter projects with no enrollments in the previous 24 months (HUD considers this to be "people experiencing homelessness for the first time")	Metric 5.2

SO: Street Outreach ES: Emergency Shelter TH: Transitional Housing (incl. Crisis Housing) PH-RRH: Rapid Rehousing (Pathways to My Home) PH-PSH: Permanent Supportive Housing

Billing

Empower Lancaster Services

All federally funded providers within the PA-510 CoC must fully participate in and use the Empower Lancaster HMIS to enter case management hours, program-specific services such as bed-nights, and client-related expenses. Providers will use services in Empower Lancaster to record the number of ¼ hour units of service provided to clients (case management) as well as the number of dollars of client assistance funds dispensed (client financial assistance, RRH financial assistance, etc.) for reimbursement. Client assistance funds will also require approval from O4C. Invoices will need to include documentation of the expense, including client name in some cases.

Services are entered in Empower Lancaster using the Services section of the site, located within the Case Management menu. The list of available services will vary by program type. The current list of services by program is attached as Appendix F. It is also available via the Empower Lancaster Support section. Services will be revised and republished annually.

Neighborly Software

Neighborly is the online portal utilized by the Lancaster County Redevelopment Authority and CoC to manage all grant applications and processes. Providing a centralized, standard, and consistent platform for partners to apply for grant opportunities and manage the awarded funds. Grant managers can apply directly through Neighborly for competitive funds during the application process. Once awarded and approved, all invoicing is done through Draws in the Neighborly system, which allows both the grantor and the grantee to see the current funding status.

Assessment Tools

VI-SPDAT

HUD requires all Continuums of Care communities to integrate a general order prioritization into their coordinated entry system to ensure a fair and equitable allocation of limited resources. The Vulnerability Index Service Prioritization Data Assessment Tool (VI-SPDAT) is the assessment tool currently used in PA-510 to assist in prioritizing households experiencing homelessness. This tool generates a numerical score that can inform decisions about and referrals to emergency services and housing programs.

The VI-SPDAT is intended to be administered once per individual episode of homelessness. Excluding extraordinary circumstances, a person will be assessed, and the results of this assessment will be considered valid until there is a significant change that affects their need for services (e.g., they become disabled, change in size of household). If the numerical score generated by the VI-SPDAT assessment does not accurately capture the CHART worker or case manager's perception of the situation, then they can advocate for reassessment, either to the CHART manager or directly to the O4C.

Pathways Rapid Re-Housing and Permanent Supportive Housing providers should utilize VI-SPDAT scores to enroll households into their programs based on need and vulnerability as program demand far outweighs the supply of beds, subsidies, case management services, and affordable housing units. PA-

510 currently uses two versions of the VI-SPDAT in the coordinated entry process, a version for single adults and a version for families (Versions 4.0 and 2.0 respectively). Please be advised that this assessment tool can be revised at any time to ensure the best mechanism is in place to serve the community. Please confirm with the O4C about the most current assessment tool.

Ultimately, the VI-SPDAT is intended to make it easier for CHART and outreach workers to identify individuals with an urgent need for services. The numerical score generated by this assessment is not the end-all be-all and should not carry more authority than staff observations and other assessment results.

VI-SPDAT Score Range	
Family VI-SPDAT	
9+	PSH
4 - 8	Pathways (RRH)
0 – 3	
Single Adult	
8+	PSH
4 – 7	Pathways (RRH)
0-3	Diversion

Strengths Matrix

The Strengths Matrix (See Appendix E) is utilized by the CoC to document client progress towards self-sufficiency. It uses a strengths-based perspective to showcase client skills and abilities and their development over time using a 5-point scale over 17 domains. Best practice dictates that for Pathways and Prevention Programs, the tool should be used at the 2nd meeting with the client (after a relationship and some trust has been established), then again, every 90 days and at program exit. For Shelter and Drop-In Center Programs, the tool should be used after the client has been in the program for 7-10 days, then again, every 45 days and at program exit. The data collected from this tool serves as a means of tracking the depth of need for individuals and whole programs, a valuable resource for both demonstrating client progress and identifying funding priorities.

Standards by Program Category

Client Financial Assistance Funds for CHART, Outreach, and Emergency Shelters

The Lancaster County Homelessness Coalition's (LCHC) flexible funds provide client financial assistance (CFA) for homelessness service clients enrolled in either CHART, Outreach, or Emergency Shelter programs (HUD defined homeless). The intended use of this short-term financial assistance is to help clients address immediate needs.

This process serves to establish equitable access for contracted service providers to CFA funds held and distributed by the Lancaster County Office for the Homelessness Coalition (O4C). All expenditures must be for eligible services provided within Lancaster County during FY 23-24 and have proper supportive documents.

Lancaster County Homelessness Coalition's contracted service providers performing Coordinated Assessment (CHART), Outreach, and Emergency Shelter services may apply for CFA related expenditures. CFA funds may be used for eligible expenses including:

- Birth cert/SSN card
- Driver's license/PA ID/Other identification documents
- Public transportation
- Rental application fee
- Security deposit
- First/last month rent
- Utility assistance (arears or deposits)
- Recovery Housing (first month/security)
- Medical Assisted Living (first month/security)

This new process of a preauthorization request is necessary due to the limited amount (\$150,000) of CFA during FY 23-24. Case managers should have exhausted other client resources prior to use of CFA funds (e.g., other grant sources or community funds).

Expenses Equal to or Less than \$250

Expenses equal to or less than \$250.00 for typical CFA needs (e.g., driver's license/ID fees, social security cards, other identification documents, or rental application fees, etc.) will not require prior authorization from the O4C. These expenses should be included in the monthly invoices, itemized separately by client, showing the agency name, Empower Lancaster (EL) #, expense date, amount, and description along with documents providing proof of expenditure such as receipt or cancelled check with noted line-item memo.

Expenses Greater than \$250

All requests over \$250 (e.g., rental or utility deposits, first month rent) or related to unusual circumstances (e.g., change in family composition) require prior authorization from the O4C. A completed Client Financial Assistance Funds Prior Authorization request should be emailed to Jody Heinrich in advance of any expenditure. Requests will be responded to within 24 hours of receipt during normal business hours. No reimbursements will be made for amounts over \$250 **without obtaining prior authorization.**

Reimbursements of client assistance funds are limited to \$1,000 per client and \$3,000 per family (to be tracked by EL #), per fiscal year. These limitations are based upon total funds available to the contracted service providers during FY 23-24, until all monies have been exhausted.

Any client financial assistance, regardless of the amount, must be entered in Empower Lancaster for each transaction including:

- Case note describing interaction (if applicable)
- Service entry for the CFA cost incurred.

Empower Lancaster service report (PDF) documenting the CFA is required along with the expense invoice. All invoices and supporting documents are to be submitted within Neighborly.

Coordinated Entry

The Coordinated Housing and Referral Team (CHART) is a component of the County's coordinated entry system to ensure all residents in housing crisis have fair, equal access and are quickly identified, assessed for, referred, and connected to housing and assistance based on their strengths and needs. The goal is to connect clients to services to help them obtain/maintain safe, suitable, affordable housing. The Program serves all population groups and household types and covers the entire County.

Homeless service providers are an extension of the Coalition's CHART system, providing coordinated entry services as well as housing support case management. Contracted providers will target individuals who are literally homeless (on the street, in a shelter or in a place not meant for human habitation) or at imminent risk of becoming homeless within the next 14 days (e.g., eviction lock out date within 11 days) as a priority. While Domestic Violence service providers are exempt from participating in local coordinated assessment efforts, they are required to obtain and maintain similar data in a comparable database and share its aggregate data with the CoC. Coordination efforts between Lancaster's coordinated assessment efforts and DV providers will continue.

Initial screening tools, including CHART and VISPDAT are utilized to assess the immediate needs, program eligibility, and prioritization for individuals or families requesting services. At the conclusion of these assessments, or in the following short-term case management period, a CHART worker will make any referrals for the individual that will best fit their needs, depending on eligibility and availability. These referrals could include shelters, re-housing programs, or community resources. Referrals are to be entered as a service within Empower Lancaster with a corresponding case note.

All coordinated entry programs shall ensure that their programs follow HUD Notice CPD-17-01 Notice of Establishing Additional Requirements for a Continuum of Care, issued January 23, 2017.

Eligibility

- Individuals or families defined by HUD as category 1 or 4.
- Individual veterans or households with veterans that are deemed ineligible for benefits and cannot be assisted by VA.
- Individuals or families defined by HUD as category 4 homeless (fleeing domestic violence)
- Individuals or families who are at imminent risk for homelessness in the following circumstances:
 - within 14 days of discharge from an institution such as a hospital, other medical, or correctional facility, or a drug and alcohol rehabilitation treatment center with no place to go after discharge; include Jail or
 - living at a hotel, paid for by nonprofits, where funds to remain there are limited and will not sustain the household past 14 days.

Pre-screening

- The pre-screening process shall be completed by a trained and approved CHART staff or the United Way of Lancaster County.
- The following basic demographic information shall be gathered and entered in Empower Lancaster:

- Name
 - Social Security Number
 - Date of Birth
 - Race
 - Ethnicity
 - Gender
 - Veteran Status
 - Disabling Condition
 - Residence Prior to Program Entry
 - Housing Status
- Additional questions are used to determine eligibility for homeless services:
 - Have you or any adult currently living in your household ever served in any branch of the US military?
 - Are you currently living on the street, or in a place that was not really meant for people to live in, or in an emergency or a transitional housing program?
 - Are you currently incarcerated, were they homeless prior to incarceration, have a release date that would have you incarcerated 90-days or less, will be homeless upon release?
 - Are you in danger of losing your housing?
 - Do you have a court order eviction notice?
 - When will you lose your housing?

Minimum Standards

- Prioritize people experiencing HUD Category 1 literal homelessness.
- Provide mobile coordinated assessment services to clients unable or unwilling to utilize traditional access points.
- Complete CHART and VI-SPDAT assessments for each eligible client, ideally within 24 hours, in person or the best way to meet the needs of the client; create diversion plans when possible; encourage client follow-through on goals and appointments set in CHART sessions; and provide resources and assistance to those diverted or ineligible for services. Meetings include:
 - Assessment—looks at each client’s catalyst for homelessness and barriers to obtaining permanent housing.
 - Diversion—explores whether there are any potential resources a household may have to stay where they are currently residing or move to another housing opportunity.
 - Referral—The CHART worker and individual/family work together to identify what type of housing (size, location) is required—what can they afford, what special needs and/or supports are needed—and often bridges access to appropriate housing and support services. CHART staff aim “aim” or a must? to have all clients leave their appointment with a “next steps” plan of action.
- Make referrals, via Empower Lancaster, for available services based on the approved CoC prioritization process.
- Identify and give clients all relevant referrals and appropriate mainstream resource information.
- Inform clients who meet specific criteria about CHART client assistance funds which may be used for move-in costs (security deposit, first-month’s rent), or to cover expenses related to becoming document-ready (birth certificates and photo IDs, for example). These funds are available through the Office for the Coalition.
- Develop a clear plan of what the client needs to follow up with and what the CHART worker will follow up with as well as timelines if appropriate. Following up to ensure referrals are made and completed.

- Participate in trainings and CHART meetings delivered by CHART manager and O4C and other experienced and professional individuals identified by the CoC.

Program Indicators

- 80% of households who meet with a CHART worker and complete a coordinated entry process will be given a plan with next steps identified (measured with Services by Program report in Empower Lancaster). Some clients are deemed ineligible or decline to complete a plan, which accounts for an 80% goal.
- 100% of prioritized households (as defined by the LCHC Prioritization Policy) are referred to a housing resource by CHART (measured with CE Referrals and the Coordinated Entry APR report in Empower Lancaster). *This outcome will be measured starting October 1, 2023.*
- 20% of households referred to CHART will be diverted from accessing emergency shelter (measured with CE Referrals and the Coordinated Entry APR report in Empower Lancaster). *This outcome will be measured starting October 1, 2023.*
- Data error rates between 0 and 15%, and 0% Missing/Null data (measured with Data Quality Report in Empower Lancaster).

Street Outreach

Street Outreach is a vital strategy, which aligns with a housing-focused approach, to reach and assist individuals experiencing unsheltered homelessness. The PA-510 CoC Street Outreach workers, employed by multiple service providers across the county, work as a team. They actively search for and engage with individuals living in places not meant for human habitation, such as campgrounds, sidewalks, parks, abandoned buildings, or vehicles. Their proactive approach helps identify individuals facing severe homelessness challenges and are often isolated and disconnected from services.

Through active engagement, Street Outreach workers provide immediate assistance with addressing a person's basic needs. They help individuals and families with access to food, water, clothing, blankets, showers, medical attention, and other essential items. They are engaging in conversations, conducting CHART, VI-SPDAT, and other vital assessments, and developing relationships with individuals to understand their unique circumstances, challenges, and aspirations. At the same time, offering support, building rapport, and establishing trust with individuals.

The team collaborates with various community service programs and partners around the county such as CHART (Coordinated Entry), Pathways and PSH programs, shelters, healthcare providers, mental health agencies, substance abuse treatment centers, and other relevant resources. These collaborations ensure a coordinated response to unsheltered homelessness to maximize available resources.

Eligibility

- Individuals or families within Lancaster County experiencing HUD category 1 or 4 homelessness.

Minimum Standards

- The Outreach Worker (OW) will identify and build rapport with individuals and families living on the street, in vehicles or places not meant for human habitation who are experiencing homelessness.
- Outreach workers are an integral part of the Coordinated Entry system and will be expected to complete a pre-screening and assessment with individuals as they encounter them, reducing the number of contacts individuals will need to access services.
- OW must obtain identifying information of clients engaged with for input in Empower Lancaster for the purposes of client identification and deduplication. This includes demographics and other Personally Identifiable Information like social security number and date of birth.
- Outreach Workers must record their first date of engagement with clients in Empower Lancaster using a one-time field, located in the Program Enrollments screen. This may be the client's program entry date, or a prior date if engagement begins before a full assessment can be completed.
- OW will assist clients in breaking the cycle of homelessness by moving from the street to shelter, accessing necessary social services, and working towards permanent housing.
- OW will provide individualized support by helping each client develop a plan to address their barriers, increase their income, and maintain and sustain permanent housing.
- OW will offer services in a non-coercive and nonjudgmental manner, providing the client with knowledge and empowerment to choose the best resources for their situation.
- As part of the plan, the OW will identify each area in which clients will need assistance to accomplish the outlined goals and objectives (i.e., scheduling appointments, applying for public benefits, identifying subsidized housing, etc.) and the OW will provide or find that assistance for

their clients wherever possible. Client Assistance funds are available through the office for the coalition.

- Case management for outreach services continues until client enrollment in an ES or other permanent housing services such as RRH or PSH.
- Details about eligible costs can be found in [24 CFR 576.101\(a\)](#) and are dependent upon funds allocated to Lancaster County CoC and contracted providers.

Program Indicators

- Outreach clients will be referred to CHART Coordinated Entry and other programs, including housing programs like emergency shelter, as well as resources in the community including food, hygiene, medical treatment, and behavioral health. The number and types of referrals made, total clients referred, and the total number of Outreach contacts between workers and clients will be reported using the Services by Program report in Empower Lancaster.
- Data error rates between 0 and 20%, and 0% Missing/Null data (measured with Data Quality Report in Empower Lancaster).
- 100% of clients have a Date of Engagement entered via the one-time field (measured with Data Quality Report in Empower Lancaster)

Prevention

Every circumstance that could end in homelessness is a crisis that can be overwhelming and disempowering. It is essential to respond in a way that includes a swift and thorough assessment of a household's situation to prevent them from moving into an emergency shelter or living in a place not meant for human habitation. Identifying their immediate needs, potential risks, and any underlying factors contributing to the housing instability while also recognizing their resources may assist them in regaining a sense of control.

Prevention involves maximizing community resources by collaborating with various organizations, schools, churches, government agencies, and non-profits to create a comprehensive and effective support system for individuals and families at risk of homelessness.

Eligibility

- Resident of Lancaster City or County with a total household income at or below 200% of the Federal Income Poverty Guidelines (FPIG), except in cases of domestic violence or disaster.
- Do not have sufficient resources or support networks readily accessible to resolve the housing crisis.
- Note: eligibility is directly connected with the funding source.

Minimum Standards

- Ensure total household income is at or below 200% of the [Federal Poverty Guidelines](#).
- Target assistance to prevent housing crises from escalating further and resulting in homelessness.
- Utilize prevention funding for eligible expenses to maintain safe housing in accordance with the funding source for residents of Lancaster County. Funding for clients should be brief and limited, as a stop gap or transition for clients from support to independence.
- Connect with existing local resources to meet the needs of households experiencing or at risk of homelessness.
- Develop a service plan, alongside the household members, that clearly identifies specific steps they can take to retain or obtain housing and leads to self-sufficiency.

Program Indicators

- 56% of all clients will be referred to mainstream benefits and tracked in Empower Lancaster (measured by non-cash benefits and health insurance using the APR report in Empower Lancaster).
- 80% of all exits are diversions to non-homeless destinations.
- All financial assistance is documented in Empower Lancaster regardless of funding source.
- Data error rates between 0 and 15%, and 0% Missing/Null data (measured with Data Quality Report in Empower Lancaster).

As the prevention program expands, a prioritization process for homelessness prevention will be developed. Homelessness assistance funds should not be distributed on a first come, first served basis. At all times, agencies are to consider the vulnerability of the household and situation of the circumstances putting the household at risk of homelessness.

Diversion

Aims to identify alternative housing options that can help individuals and families avoid entering emergency shelters or becoming homeless. It begins with building a trusting relationship with the household to understand their unique circumstances, needs, strengths, and goals. Diversion is not a one-time transaction but an ongoing supportive relationship to ensure the individual or family's long-term stability.

It is important to recognize the impact of social support in resolving a housing crisis. This involves exploring the individual or family's existing support network, such as family, friends, or community organizations, and leveraging these connections where appropriate.

Diversion is a problem-solving collaboration between staff, community partners and the individual or family to identify potential solutions and navigate available resources. Connecting households with government assistance programs, local nonprofit organizations, or community resources that can provide housing assistance, financial support, or other necessary services.

Minimum Standards

- Diversion services should be provided immediately after the completion of the Vi-SPDAT assessment.
- Prioritize individuals or families who otherwise would be homeless or in a shelter the same day they are calling for a shelter bed.
- Enter a referral, where appropriate, and case note relaying the results of the diversion efforts into Empower Lancaster.
- Enter the amount, type and date of financial assistance or rental assistance provided on behalf of a client in Empower Lancaster.
- No follow-up surveys, calls or other types of contact are required. Empower Lancaster data should indicate how and where clients exited the system.

Emergency Shelter

Emergency shelters play a crucial role in providing a temporary, warm, safe, dry overnight refuge for individuals and families experiencing homelessness. Within the PA-510 CoC emergency shelters operate with a low-barrier approach, which means they have minimal requirements or restrictions for entry or length of stay. This approach aims to remove barriers that may prevent individuals from accessing shelter. Specific entry requirements are determined by the shelter provider in collaboration with the O4C.

Providers are not just offering a place to sleep; they are required to include supportive services in their operational model. These services are designed to help guests secure safe and appropriate housing that meets their specific needs and preferences. Supportive services may include case management, housing counseling, employment assistance, healthcare referrals, substance abuse counseling, and other forms of assistance to help individuals and families regain housing stability.

Eligibility

- Individuals or families defined by HUD as category 1 or 4 homeless and located in Lancaster County.

Minimum Standards

- Utilize diversion and problem-solving strategies.
- Provide emergency shelter beds for adults and families without any guest charges. These rooms shall be reserved for persons experiencing homelessness as defined by HUD.
- Provide supportive services to assist clients in remedying their current homelessness status and attain permanent housing or sustainable living arrangement.
- Administer the Strengths Matrix (Appendix E) for guests staying longer than 10 days and shall be initially administered as closely to the 12th day as possible, followed by a final assessment provided near the time of exit of the program. Staff may administer the tool at any other time if helpful to client and staff in determining needs and growth.
- Maintain minimum safety, sanitation and privacy standards in addition to local government safety standards as detailed in [24 CFR 576.403\(b\)](#).
- Federally funded shelters will maintain a no requirements for income or sobriety policy for guests to access the services.
- Complete and upload a Homelessness Verification form for each shelter guest.
- Collaborate with Street Outreach workers and other service providers to ensure that Emergency Shelters serve as a point of contact for resources and connections to relevant services.

Program Indicators

- Emergency shelter is considered a last resort; all diversion options are to be explored prior to entrance into the shelter.
- Demographic information including any disabling conditions and length of homelessness will be completed for all shelter guests within 24 hours upon entrance into the shelter and uploaded in Empower Lancaster.
- Bed utilization rate—the number of occupied shelter beds divided by the total number of beds in each shelter program—will meet or exceed 85% when measured on a quarterly or annual basis.

- Bed-night information in Empower Lancaster must reflect accurate utilization within 24 hours.
- Data error rates between 0 and 15%, and 0% Missing/Null data (measured with Data Quality Report in Empower Lancaster).

Crisis Housing (TH-RRH)

Transitional housing is a temporary bridge from homelessness to permanent housing which provides services (i.e., case management and life skills training) and housing assistance. In Lancaster County HUD defined transitional housing is referred to as Crisis Housing.

The PA-510 CoC Crisis Housing Program is intended as an intermediate support (6 months or less), service-intensive program, addressing systemic gaps in emergency shelters for individuals and families unable to utilize them, regardless of the reason, in Lancaster County before moving into permanent housing. Providing a safe, reassuring environment where people can begin to overcome trauma, address causes that lead to homelessness or keep them homeless and rebuild their support network. This interim stability, between the streets and permanent housing, for enrolled individuals and families depends upon intensive supportive services.

Eligibility

HUD defined homelessness categories 1 and 4. (See Appendix B)

Minimum Standards

- Ensure households are dually enrolled in the Crisis Housing and Rapid Re-Housing (“Pathways”) programs.
- Work collaboratively with staff from Pathways on behalf of the enrolled households to determine permanent housing solutions.
- Determine each household’s level of intervention, based on the intensity and extent of their needs, and provide a necessary and appropriate level of Supportive Services.
- Evaluate all households monthly, in their residence, to determine continued program eligibility.
- Provide education and referrals for households to connect with mainstream services for benefits, employment, and community-based services (as needed/appropriate).
- Review, alongside the Pathways case manager, the household’s Strengths Matrix to ensure the alignment of needs and interventions.

Program Indicators

- 80% of all exits are to permanent destinations including:
 - Long-term care facility or nursing home
 - Owned by client, no ongoing housing subsidy
 - Owned by client, with ongoing housing subsidy
 - Permanent housing for formerly homeless persons
 - Rental by client, no ongoing housing subsidy
 - Rental by client, with housing subsidy
 - Staying or living with family or friend, permanent tenure
- 80% of all clients will be referred to mainstream benefits and tracked in Empower Lancaster (measured by non-cash benefits and health insurance using the APR report in Empower Lancaster).

Pathways (Rapid Re-Housing)

Pathways, the Lancaster County Rapid Re-housing (RRH) program, is a housing first initiative focused on quickly moving individuals and families out of homelessness into permanent housing. Time-limited financial assistance and targeted supportive services are intended to help people regain and maintain long term housing. Employment, income, absence of criminal record, or sobriety are not participation barriers and resources are matched to the needs of each household. Working alongside a Pathways case manager individuals and families set housing sustainability goals, develop a plan that includes mainstream benefits and other resources, and take action to achieve their success.

Eligibility & Participation

- HUD defined homelessness categories 1 and 4 for ESG funded programs. (See Appendix B)
- Individuals or families with zero income are eligible for enrollment.
- A period of sobriety or a commitment to participate in treatment is not an eligibility requirement.
- Enrolled clients must meet with a case manager not less than once per month to assist them with problem solving and ensuring long-term housing stability. At least once every three months these meetings must occur in the client's home.
- Permanent housing lease agreements must be in the client's name for an initial period of at least one year, renewable, and terminable only for cause. All household members are required to adhere to the rented unit's terms of lease.
- Verify and document, within Empower Lancaster, that the household receives no other assistance for rental costs or costs otherwise eligible under financial assistance.
- Each household should pay the maximum amount of rent they can afford. The household's portion of rent must be paid from them directly to the lease holder.
- Program services and financial assistance may not exceed 24 months within a 36-month period. Financial assistance beyond 12 months will be limited unless significant barriers such as poor employment history, severe mental or physical conditions, or recent or current experience of violence exist within the household.
- Supportive services are limited to six months after financial assistance ends.
- Recertification
 - Regular Recertification - Participants must certify their income at the beginning of their tenancy and annual review.
 - Interim Recertification - If there are changes in household size or income, participants must ask their case manager or program manager for an interim recertification within 30 days to add/remove a household member or adjust their rent according to the new household income.

Minimum Standards

- Follow the prioritization and CHART procedures for entry into the Pathways program. Properly enrolling and exiting participants from the program within Empower Lancaster.
- Ensure a completed Homelessness Verification Form demonstrating that the individual or family were homeless the night before program entry has been completed and uploaded to Empower Lancaster. If not, take the necessary steps to obtain and upload the verification document.
- Provide information and referral so the participants can connect to mainstream services for benefits, employment, and community-based services (if needed/appropriate) so they can sustain rental payments independently when rental assistance ends/is exhausted. When making referrals, follow up to ensure receipt of assistance or to provide help in removing barriers.

- Assist participants to develop a housing plan focusing on strengths and addressing issues that may impede access to housing (such as credit history, arrears, and legal issues).
- Administer the Strengths Matrix (See Appendix E) for clients by the third engagement and then again near the time of exit from the program. Staff may administer the tool any other time if helpful to client and staff in determining needs and growth.
- Conduct housing searches alongside the participant to encourage self-sufficiency and ownership in the decision-making process. Focusing on their ability to pay rent and meet all lease requirements beyond program participation.
- Assist participants with negotiating appropriate lease agreements with landlords.
- Ensure participants understand basic landlord-tenant rights and responsibilities and the requirements of their lease and expectations for care of the housing unit, such as not causing or allowing any damages.
- Conduct and upload to Empower Lancaster the following HUD assessments related to all leased units 1) Rent Reasonableness, 2) Fair Market Rent, 3) Housing Quality Standards (HQS) Inspection, and 4) Lead-Based Paint Visual Inspection. HQS standards apply to all units even when a minimal amount of assistance (e.g., security deposit and first month's rent) is provided. Full HQS inspections must occur at the beginning and are ongoing annually along with quarterly visual inspections.
- Utilize a decreasing financial assistance model with participants who have income:
 - Security deposit, first month and/or last month rent = 100% subsidy
 - Second month's rent = 75% subsidy
 - Third month's rent = 50% subsidy
 - Fourth and subsequent month's rent = 25% subsidy
- Work with participants and landlords in resolving tenancy issues such as not paying rent or disturbing the quiet enjoyment of others. Quickly identify and take corrective action to mitigate instances where a landlord is not meeting their obligation.
- Verify at intake, every three months after enrollment, and annually whether participants lack the necessary resources and supports to maintain housing without any assistance from the CoC and determine the types and amounts of other assistance needed for them to remain housed. Annual assessments are required for each participant enrolled in the program regardless of supportive services or financial assistance.
- Determine income eligibility when the household reaches their twelfth month of service in the program. Household income for ESG requirements must be under 30% Area Median Income (AMI) for household to remain eligible for services and/or rental assistance beyond twelve (12) months. Other funding streams should be considered case by case.
- Enter time and services to each household's Empower Lancaster record and upload all collaborative financial assistance documents.
- Record the amount, type, and date of financial assistance provided to clients in Empower Lancaster.
- Support housing identification opportunities by engaging with landlords to provide and maintain units for individuals and families experiencing homelessness.
- Adhere to the Lancaster County Emergency Solutions Grant (ESG) current policies and procedures.

Program Indicators

- 80% of all exits are to permanent destinations (based on National Alliance to End Homelessness RRH benchmarks).

- 100% of clients placed in permanent housing will have a Move-In Date entered to Empower Lancaster. This field is located in the client's Program Enrollments screen in Empower Lancaster, found in the Case Management menu.
- 80% of all clients will be referred to mainstream benefits and tracked in Empower Lancaster (measured by non-cash benefits and health insurance using the APR report in Empower Lancaster).
- Data error rates between 0 and 15%, and 0% Missing/Null data (measured with Data Quality Report in Empower Lancaster).

Permanent Supportive Housing (PSH)

This program combines affordable housing and supportive services for chronically homeless people with high needs related to physical or mental health, developmental disabilities, or substance use. Successful programs include collaboration and ongoing communication between the client, supportive service providers, property owners or landlords, and/or housing subsidy programs.

Eligibility

- At least one member of the household (adult or child) must have a disability of long duration, verified either by Social Security or a licensed professional that meets the state criteria for diagnosing and treating that condition. Verification requires documentation.
- Potential program participants coming from institutions must have previously lived in a place not meant for human habitation or in an emergency shelter prior to entering the institution or transitional housing. Additionally, people from institutions must have been in the institution for fewer than 90 days.

Minimum Standards

- Prioritize chronically homeless individuals and families for vacant units in line with the PA-510 policy.
- Provide services designed to build independent living and tenancy skills and connect people with community-based health care, treatment, and employment services.
- Encourage people to participate in services that are intended to help them maintain their housing and experience a high level of self-sufficiency. (A minimum standard of monthly meetings is required.)
- All funded providers must fill their program's vacant PSH beds through the prioritization process outlined. Non-HUD funded CoC providers are strongly encouraged to fill their vacancies from this list as well.
- Ensure a completed Homelessness Verification form demonstrating that the individual or family were homeless the night before program entry has been completed and uploaded to Empower Lancaster. If not, take the necessary steps to obtain and upload the verification document.
- PSH programs may not have any requirements that are not in a standard lease. (e.g., no preconditions such as income or sobriety)
- Households waiting for PSH should be served by the Pathways program, where possible, while waiting for an available PSH unit.

Program Indicators

- At least 56% of all clients will be referred to mainstream benefits and tracked in Empower Lancaster (measured by non-cash benefits and health insurance using the APR report in Empower Lancaster).
- Data error rates between 0 and 15%, and 0% Missing/Null data (measured with Data Quality Report in Empower Lancaster).

Applicable Laws & Regulations

Code Name & Section	Description	Status & Applicability
<p>American with Disabilities Act of 1990 42 U.S.C. 12101</p> <p>Americans with Disabilities Act Title II & III Regulations</p> <p>Title II: Part 35 Nondiscrimination on the Basis of Disability in State and Local Government Services 28 CFR 35.101(a)</p> <p>Title III: Nondiscrimination on the Basis of Disability in Public Accommodations and Commercial Facilities 28 CFR 36.101(a)</p>	<p>Civil rights law that prohibits discrimination against individuals with a disability</p> <p>Part 35 implements subtitle A of Title II of the Americans with Disabilities Act, which prohibits discrimination based on disability by public entities and all services, programs, and activities provided or made available by public entities.</p> <p>Part 36 implements subtitle A of Title III of the Americans with Disabilities Act, which prohibits discrimination based on disability by covered public accommodations and requires places of public accommodation and commercial facilities to be designed, constructed, and altered in compliance with the accessibility standards established by this part.</p>	<p>12.2.2016 Final Rule. Applies to all housing providers covered by the Fair Housing Act</p> <p>Title II applies to all services and programs that receive local or federal government funds.</p> <p>Title III applies to all businesses and nonprofits serving the public.</p>
<p>Community Development Block Grants</p> <p>24 CFR 570</p>	<p>Established the regulations for entitlement and non-entitlement funds, state programs, and special purpose grants.</p>	<p>03.16.2022 Final rule. Applies to all recipients and subrecipients of CDBG funds.</p>
<p>Continuum of Care Program</p> <p>24 CFR 578</p>	<p>Establishes the regulations for the Continuum of Care Program, including requirements for the CoC planning process and regulations governing use of CoC funds.</p>	<p>11.30.2020 Final rule. Applies to all recipients and subrecipients of CoC funds.</p>
<p>Emergency Solutions Grants Program</p> <p>24 CFR 576</p>	<p>Establishes payment of certain expenses for emergency shelters, homeless street outreach, homelessness prevention and rapid re-housing.</p>	<p>07.31.2021 Final rule. Applies to all recipients and subrecipients of ESG funds.</p>

<p>Equal access in accordance with the individual's gender identity in community planning and development programs.</p> <p>24 CFR 5.106</p>	<p>Ensures equal access to CPD programs, shelters, other buildings and facilities, benefits, services, and accommodations is provided to an individual in accordance with the individual's gender identity, and in a manner that affords equal access to the individual's family.</p>	<p>Effective 10.21.2016</p>
<p>Fair Housing Act</p> <p>42 U.S.C. 3601-3619</p>	<p>Prohibits discrimination in the sale or rental of housing, regardless of race, color, religion, national origin, family status, and or disability. Provides opportunity for persons with a disability access to reasonable accommodations regarding rules, policies, practices, or services necessary to their use and enjoyment of a dwelling.</p>	<p>01.24.2020</p>
<p>Homeless Emergency Assistance and Rapid Transition to Housing</p> <p>HEARTH Act</p>	<p>The first and only major reauthorization of the McKinney-Vento Homeless Assistance Act—the largest source of funding for homeless assistance programs.</p>	<p>Effective 05.20.2009</p>
<p>McKinney-Vento Homeless Assistance Act</p> <p>Stewart B. McKinney Homeless Assistance Act</p>	<p>To provide urgently needed assistance to protect and improve the lives and safety of the homeless, with special emphasis on elderly persons, handicapped persons, and families with children.</p>	<p>Effective July 22, 1987</p>
<p>Notice Establishing Additional Requirements for a Continuum of Care or Coordinated Assessment System.</p> <p>HUD Notice CPD-17-01</p>	<p>Requires each CoC to establish and operate a centralized or coordinated assessment system with the goal of increasing the efficiency of local crisis response.</p>	<p>Effective 01.23.2017</p>

<p>Restoring Affirmatively Furthering Fair Housing Definitions and Certifications</p> <p>24 CFR 5, 91, 92, 570, 574, 576, 903</p>	<p>A substantive definition of the AFFH requirement and actionable steps to overcome segregation, promote fair housing choice, and inclusive communities.</p>	<p>07.31.2021 Final rule. Applies to all HUD recipients and subrecipients.</p>
<p>Section 504 of the Rehabilitation Act of 1973</p> <p>29 U.S.C. § 794</p>	<p>States that no qualified individual with disabilities should, solely by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.</p>	<p>Part of the 2020 edition of the U.S.C.</p> <p>Updated as of January 13, 2021 Applies to all recipients and subrecipients of HUD financial assistance</p>
<p>Violence Against Women</p> <p>34 U.S.C. 121</p>	<p>Increases protections and services for all victims of domestic violence, dating violence, sexual assault, or stalking, regardless of race, color, religion, national origin, sex, gender identity, sexual orientation, or disability.</p>	<p>03.15.2022 Effective 10.01.2022 Reauthorized through 2027 as part of the Consolidated Appropriations Act of 2022.</p> <p>Must be applied consistently with all nondiscrimination and fair housing requirements.</p>

Frequently Used Terms

PA 211 – Information and referral service that provides pre-screenings for entrance into the CoC homelessness service system. Provides information on a wide range of resources including housing, utilities, food, employment, health, and mental health. Accessible 24 hours a day/ 7 days a week by dialing 211 or visiting website <https://www.pa211.org/>.

Americans with Disabilities Act of 1990 (ADA) – The Americans with Disabilities Act (ADA) is a federal civil rights law that prohibits discrimination against people with disabilities in everyday activities.

Annual Action Plan – The Consolidated Plan is carried out through Annual Action Plans, which provide a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan.

Annual Homeless Assessment Report (AHAR) – HUD report to the U.S. Congress that provides nationwide estimates of homelessness, including information about the demographic characteristics of homeless persons, service use patterns, and the capacity to house homeless persons.

Annual Performance Report (APR) – Information provided to HUD to quantify need for continued Federal funding of homeless programs. Used by HUD representatives to determine the need for technical assistance or monitoring.

Annual Renewal Demand (ARD) – The combined amount of the projects under the CoC that will be eligible for renewal before any required adjustments, calculated by combining the total amount of funds requested by eligible projects and the eligible renewal project amounts that were reallocated.

Case Management – Time spent by professional staff alongside or on behalf of a client problem solving, planning, seeking, advocating for, or monitoring services (i.e., discussing goals or housing plans, connecting clients with mainstream benefits, negotiating debt repayment, finding employment, or obtaining documents). The frequency and intensity of client meetings should be established at levels that are necessary for the client's success in accordance with the program's requirements.

Collaborative Applicant – The eligible applicant designated by the Continuum of Care (CoC) to collect and submit the CoC Registration, CoC Consolidated Application (which includes the CoC Application and CoC Priority Listing), and apply for CoC planning funds on behalf of the CoC during the CoC Program Competition. The O4C is the collaborative applicant for the PA-510 CoC.

Community Action Partnership of Lancaster County (CAP) – An anti-poverty organization that manages various initiatives and collaborates with local agencies aiming to address different aspects of living with financial insecurity and homelessness.

Consolidated Annual Performance and Evaluation Report (CAPER) – Grantees report on accomplishments and progress toward Consolidated Plan goals outlined within their Annual Action Plans in their CAPER.

Community Development Block Grant (CDBG) – Community Development Block Grant Program is funded through the U. S. Department of Housing and Urban Development (HUD) and is provided annually to eligible jurisdictions to complete a wide variety of community development projects such as public facilities, infrastructure, disaster recovery, affordable housing, and other projects.

Code of Federal Regulations (CFR) – General and permanent rules published in the Federal Register by the departments and agencies of the Federal Government. HUD has their own section of the CFR that outlines the rules and requirements for their programs.

Coordinated Housing and Assessment Referral (CHART) – Lancaster County's coordinated entry program whose role is to coordinate and manage access, assessment, prioritization, and referrals to emergency housing services and other housing programs. It is essentially the gateway to homelessness services as its primary function is to serve as a 'coordinated entry' point. Accessed through several avenues: calling, walk-ins, or referral. Fulfills HUD requirement of coordinated entry system in the county.

Continuum of Care (CoC) – Group composed of representatives of relevant organizations to plan for and provide, as necessary, a system of outreach, engagement, and assessment; emergency shelter; rapid re-housing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless persons and persons at risk of homelessness.

Community Development Block Grant (CDBG) – Annual grants determined on a formula basis to states, cities, and counties to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons.

Department of Community and Economic Development (DCED) – Government agency that administers grants, loans, and tax credits with the intent to spur economic growth, community revitalization, and job creation throughout the state.

Diversion (from shelter) – Working with people who are at risk of homelessness to identify and access resources to avoid entering emergency shelters or becoming homeless. Strategies include connecting them with family or friends who could provide temporary housing, finding alternative housing options such as rental assistance or subsidized housing, and addressing underlying issues such as addiction, unemployment, or domestic violence.

Domestic Violence (DV) Shelter – A private nonprofit organization whose primary mission is to provide shelter and housing services to victims of domestic violence, dating violence, sexual assault, or stalking.

Emergency Food and Shelter Program (EFSP) – Program administered through the United Way of Lancaster County that provides funding to organizations in Lancaster County helping people that are hungry and/or experiencing homelessness or at risk of homelessness.

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

Emergency Solutions Grant (ESG) – Emergency Solutions Grant Program is designed to assist people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. ESG is a formula block grant program, and eligible recipients generally consist of metropolitan cities, urban counties, territories, and states. ESG funds may be used for five project components: street outreach, emergency shelter, homelessness prevention, rapid rehousing, and HMIS. Administrative activities, up to the HUD annually allowed amount, are also eligible.

Fair Market Rent (FMR) – The rent, including the cost of utilities (except telephone), as established and published annually by HUD for units of varying sizes (by number of bedrooms), that must be paid in the housing market area to rent privately owned, existing decent, safe, and sanitary rental housing.

Federally Qualified Community Health Center (FQCHC) – A FQCHC aims to serve an underserved area or population, providing comprehensive medical services.

Homeless – An individual or family who lacks a fixed, regular, and adequate nighttime residence, HUD defined at [24 CFR 578](#).

Homeless Assistance Program (HAP) – State Block Grant Funds provided through the Commonwealth of Pennsylvania to counties for services to prevent and end homelessness. Eligible activities include case management, rental assistance, bridge housing, emergency shelter, and innovative supportive housing services.

Housing Choice Voucher (HCV) – Federal program providing rental assistance to very low-income households to maintain decent, safe, and sanitary housing. Commonly referred to as Section 8.

Homelessness Data Exchange (HDX) – An online data submission tool for reporting to HUD that supplies data for the Annual Homeless Assessment Report (AHAR).

Homeless Emergency and Rapid Transition to Housing (HEARTH) Act – Homeless Emergency and Rapid Transition to Housing Act of 2009 amended and reauthorized the McKinney-Vento Act including consolidating separate homeless assistance programs and codifying in Federal law the CoC planning process, [HEARTH Act](#).

Housing Inventory Count (HIC) – A point-in-time inventory count of provider programs within a CoC that provide filled beds and total units dedicated to serve people experiencing homelessness categorized by Emergency Shelter, Transitional Housing, Rapid Re-housing, Safe Haven and Permanent Supportive Housing.

Health Insurance Portability and Accountability Act (HIPAA) – A federal law that required the creation of national standards to protect patient health information (PHI) from being disclosed without the patient’s consent or knowledge. The Privacy Rule portion of the law permits a covered entity to use and disclose PHI, without an individual’s authorization, for instances of suspected or reported abuse, neglect, or domestic violence.

Homeless Management Information Systems (HMIS) – Information system used to confidentially aggregate data on housing and services to households experiencing or at risk of homelessness defined at [24 CFR 576.400\(f\)](#). Empower Lancaster is the HMIS utilized by the Lancaster County Homelessness Coalition.

Housing Opportunities for People with AIDS (HOPWA) – The only Federal program dedicated to the housing needs of people living with HIV/AIDS, primarily making grants for local projects that benefit low-income individuals living with HIV/AIDS.

Homelessness Verification (HV) – Set of procedures to determine whether potential program participants meet the homeless definition described in 24 CFR 576.2.

Household – All occupants of a housing unit, including related and unrelated people, if any, such as lodgers, foster children, wards, employees, partners, and roomers. A household is also comprised of a person living singularly.

Housing First – An approach to connect individuals and families experiencing homelessness quickly and successfully to permanent housing without preconditions and barriers to entry, such as income, sobriety, treatment or service participation requirements. Supportive services are offered (not required) to maximize housing stability and prevent returns to homelessness.

Housing Stability Case Management – The costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing.

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

U.S. Department of Housing and Urban Development (HUD) – A federal agency that administers programs providing housing and community development assistance.

Homeless Services Provider Network (HSPN) – Providers of homelessness services that work collaboratively to provide various services and resources to homeless individuals in their community. Bi-monthly training is provided with networking and sharing among providers.

Housing Quality Standards (HQS) – Housing standards established under the HCV program regulations that units must meet and maintain in order for any assistance to be paid on behalf of a household, defined at [24 CFR 982.401](#).

Lancaster County Behavioral Health and Developmental Services (BHDS) – A local tax-funded agency dedicated to the planning and administering of community mental health, intellectual development disability, and early intervention services. Oversight of the BHDS program is through the Lancaster County commissioners and the BHDS board.

Lancaster County Homelessness Coalition (LCHC) – A collection of partners that collaborate to address the issue of homelessness in Lancaster County through providing various services to individuals who are homeless or at risk of homelessness. Led by the Office for the Coalition (O4C) who manages the Continuum of Care for Lancaster County (PA - 510).

Lancaster City Housing Authority (LCHA) – A local government entity responsible for developing and administering public housing in addition to administering federal housing assistance programs within Lancaster City limits.

Lancaster County Housing and Redevelopment Authorities (LCHRA) – A local government entity responsible for developing and administering public housing and works towards redeveloping properties with the intent of developing more affordable housing.

Lead-Based Paint – Requirements are listed at [24 CFR 576.403\(a\)](#). The Lead-Based Paint Poisoning Prevention Act ([42 U.S.C. 4821-4846](#)), the Residential Lead-Based Paint Hazard Reduction Act of 1992 ([42 U.S.C. 4851-4856](#)), and implementing regulations in [24 CFR 35](#), subparts A, B, H, J, K, M, and R apply to all shelters assisted under ESG program and all housing occupied by program participants.

Legal Services – Costs involving landlord/tenant matters, and the services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the program participant currently resides.

Leverage – The total amount of non-governmental resources (both cash and non-cash) committed from all sources to the project.

Match – The recipient contributions to supplement the ESG program funds in an amount that equals the recipient's fiscal year grant for ESG as per [24 CFR 576.201\(a\)](#).

Mainstream Benefits – Generally refers to publicly funded resources providing services, housing and income support to low-income households whether they are homeless or not. Includes programs that provide welfare, health care, mental health care, substance abuse treatment, food, and veteran's assistance.

McKinney-Vento Homeless Assistance Act – The Stewart B. McKinney Homeless Assistance Act [42 U.S.C. 11301](#) which requires state and local educational agencies to ensure that homeless children and youth have access to public education. Schools are required to identify and support homeless students, including those who lack a fixed, regular, and adequate nighttime residence.

Notice of Funding Opportunity (NOFO) – A notice published each year to announce the CoC Program Competition, along with the criteria recipients must meet to qualify for the funds.

Office for the Coalition (O4C) – Another name for the support staff of the Lancaster County Homelessness Coalition, supported by the Lancaster County Housing & Redevelopment Authorities.

Outreach – Providing services such as engagement, case management, and other support when needed, to unsheltered individuals living in the community. HUD defines this population as persons living anywhere not meant for human habitation.

Office of Special Needs Assistance Programs (HUD SNAPs) – The office within HUD that administers the Title V, the Continuum of Care (CoC) and the Emergency Solutions Grants (ESG) Programs.

Permanent Housing (PH) – Community-based housing without a designated length of stay and includes independent housing, permanent supportive housing (PSH) and Pathways (Rapid Re-housing) Housing program.

Permanent Housing Support (PSH) – Permanent housing in which housing assistance (e.g., long-term leasing or rental assistance) and supportive services are provided to assist households with at least one member (adult or child) with a disability in achieving housing stability.

Public Housing Authority/Agency (PHA) – An agency that manages the local public housing program through federal aid from HUD.

Point-in-Time (PIT) Count – A count of sheltered and unsheltered homeless persons carried out on one night in the last 10 calendar days of January or at such other time as required by HUD. Programs funded through this process are required to provide volunteers for the annual PIT Count.

Provider – An organization or individual that delivers housing or services to people who are homeless or at risk of becoming homeless. Providers can include nonprofit organizations, government agencies, faith-based

organizations, community-based organizations, and for-profit entities that offer a range of services related to housing, employment, healthcare, and other supportive services.

Recipient – Any entity that receives directly from HUD public housing financial assistance or housing and community development assistance funds, including, but not limited to, any State, local government, instrumentality, PHA, or other public agency, public or private nonprofit organization. They are also known as grantees.

Rent Reasonableness – HUD standard to ensure rents paid using federal funds are reasonable in relation to amounts for comparable unassisted units in the same market area. Rent reasonableness is a requirement of CoC and ESG funds.

Re-Entry Management Organization (RMO) – A local program that provides services to individuals who are “re-entering” the community specifically after a period of incarceration. Program services typically consist of drug rehabilitation, education, housing, employment, and medical services.

Rapid Re-Housing (RRH) – Program to assist individuals and families experiencing homelessness to gain permanent housing as quickly as possible with the assistance of case management and financial assistance. Pathways is the Lancaster County designated RRH program. Fulfills HUD requirement of Rapid Re-Housing in the county.

Substance Abuse and Mental Health Services Administration (SAMSHA) – an agency within the U.S. Department of Health and Human Services that leads public health efforts related to mental and substance use disorder prevention, treatment, and recovery services.

Safe Haven (SH) – Safe Havens are a refuge for homeless individuals suffering with a serious mental illness. Closing the gap in housing and services for those who may have refused help or have been denied or removed from other homeless programs.

Supplemental Nutritional Assistance Program (SNAP) – Federal program that provides nutrition specific benefits to low-income individuals and families that are used at stores to purchase food.

SSI/SSDI Outreach, Access, and Recovery (SOAR) – Program sponsored by SAMHSA to help people who are homeless or at risk of homelessness apply for Social Security Income (SSI) and Social Security Disability Insurance (SSDI).

Single Room Occupancy (SRO) – A single unit occupied by one person that may or may not contain food preparation, sanitary facilities, or both.

Social Security Disability Income (SSDI) – Government program that pays benefits to individuals and family members if the individual recently held a job for a certain amount of time and paid Social Security taxes on their earnings.

Supplemental Security Income (SSI) – Government program that pays benefits to adults and children who meet the Social Security Administration’s requirements for a qualifying disability and have limited income and resources.

Support Services Only (SSO) – Projects that allow recipients to provide supportive services such as conducting outreach to and providing referrals to other housing or other necessary services—to households experiencing homelessness for whom the fund’s recipient or subrecipient is not directly providing housing or housing assistance.

Supportive Services for Veteran Families (SSVF) – VA administered program that aims to promote housing stability among very low-income Veteran households who reside in or are transitioning to permanent housing.

Street Outreach – Providing services such as engagement, case manager, and other supportive services to meet the immediate needs of unsheltered individuals living in the community. HUD defines this populations as persons living anywhere not meant for human habitation.

Subrecipient – Term used in the CDBG, ESG and CoC programs for a public or private nonprofit agency, authority or organization, or an entity described in 24 CFR 570.204(c) receiving the aforementioned funds from

the recipient to undertake eligible activities, described in 24 C.F.R 570.500(c). Subrecipients are sometimes called subgrantees.

Temporary Assistance to Needy Families (TANF) – National-level program that provides states and territories with flexibility in operating programs designed to help low-income families with children achieve economic self-sufficiency.

Transitional Housing (TH) – A project that has as its purpose facilitating the movement of homeless individuals and families to permanent housing within a reasonable amount of time (usually 24 months). Transitional housing includes housing primarily designed to serve deinstitutionalized homeless individuals and other homeless individuals with mental or physical disabilities and homeless families with children.

Unified Funding Agency (UFA) – A Collaborative Applicant selected by the CoC (and approved by HUD) who is responsible to apply for, receive, and distribute funds for all CoC related projects.

Unique Entity Identifier (UEI) – A 12-character alpha numeric ID assigned by the System for Award Management (SAM) to identify entities conducting business with the federal government.

U.S. Interagency Council on Homelessness (USICH) – The only agency at the federal level with the sole responsibility of ending homelessness. It works across 19 federal agencies and departments, and with partners in both the public and private sectors, to improve federal spending outcomes for homelessness.

US Department of Veterans Affairs (VA) – Responsible for administering benefit programs for veterans, their families, and their survivors. These benefits include pension, education, disability compensation, home loans, life insurance, vocational rehabilitation, survivor support, medical care, and burial benefits.

Veterans Affairs Supportive Housing Program (HUD VASH) – Combines HUD's Housing Choice Voucher (HCV) rental assistance with case management and supportive services. Provided by the Department of Veterans Affairs (VA).

Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT) – Survey administered to individuals and families to establish risk and prioritization for homeless and at-risk of homelessness persons.

Women, Infants, and Children (WIC) – Government funded supplemental nutrition program for women, infants, and children that provides food and other services to low-income pregnant women and nutritional at-risk children up to age five.

Appendices

Appendix A: HUD Enlisting Mainstream Resources and Programs to End Homelessness

Appendix B: HUD Criteria for Defining Homeless & Recordkeeping Requirements

Appendix C: PA-510 Homelessness Verification 2020

Appendix D: PA-510 HMIS (Empower Lancaster) Policy Procedures

Appendix E: PA-510 Strengths Matrix Manual & Summary Page

Appendix F: PA-510 Empower Lancaster Services Mapping Workbook

2016

The Lancaster County Coalition to End
Homelessness

CONTINUUM OF CARE PERFORMANCE STANDARDS AND POLICIES

Vision: We will effectively end homelessness in Lancaster County.

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

www.lcceh.org

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

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LANCASTER COUNTY, PENNSYLVANIA

CONTINUUM OF CARE PERFORMANCE STANDARDS AND POLICIES

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

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

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

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

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

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

II. Written Standards for CoC Assistance

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

2. The pre-screening will ask for basic demographic information and enter the information into HMIS.
 - a. Name
 - b. Social Security Number
 - c. Date of Birth
 - d. Race
 - e. Ethnicity
 - f. Gender
 - g. Veteran Status
 - h. Disabling Condition
 - i. Residence Prior to Program Entry
 - j. Housing Status
 3. The pre-screening will ask for the following information to determine eligibility for homeless services:
 - a. Have you or any adult currently living in your household ever served in any branch of the US military?
 - b. Are you currently living on the street, or in a place that was not really made for people to live in, or in an emergency or a transitional housing program?
 - c. Are you in danger of losing your housing?
 - d. Do you have a court order eviction notice?
 - e. When will you lose your housing?
 4. Individuals and families who would spend the night in an emergency shelter or on the streets without any assistance will be given 1st preference when scheduling intake assessments.
 5. Persons who are at imminent risk of homelessness within 24 hours will be given 2nd preference when scheduling intake assessments.
- iii. Assessments
1. The assessment process documents the following:
 - a. Client needs based on assessment;
 - b. Eligibility based on written program standards for enrollment; 3
 - c. Referral, based on available resources; and
 - d. Disposition based on availability of housing and services in Lancaster County.
 2. Referrals for available service and housing slots are made based on a CoC-defined prioritization process. See Prioritization Process.

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

c. Transitional housing

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

d. Rapid Re-housing

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

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

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

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

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

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

III. Grievance and Appeals Policy

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

IV. Consequences of Not Meeting Standards

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

V. Appendices

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

Appendix A

Lancaster County Continuum of Care Guidelines for Determining Housing Barrier Levels

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



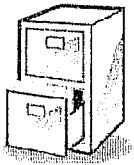
Homeless Definition

CRITERIA FOR DEFINING HOMELESS	Category 1	Literally Homeless	(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: <ul style="list-style-type: none"> (i) Has a primary nighttime residence that is a public or private place not meant for human habitation; (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); <u>or</u> (iii) Is exiting an institution where (s)he has resided for 90 days or less <u>and</u> who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
	Category 2	Imminent Risk of Homelessness	(2) Individual or family who will imminently lose their primary nighttime residence, provided that: <ul style="list-style-type: none"> (i) Residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; <u>and</u> (iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing
	Category 3	Homeless under other Federal statutes	(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who: <ul style="list-style-type: none"> (i) Are defined as homeless under the other listed federal statutes; (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; (iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; <u>and</u> (iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers
	Category 4	Fleeing/ Attempting to Flee DV	(4) Any individual or family who: <ul style="list-style-type: none"> (i) Is fleeing, or is attempting to flee, domestic violence; (ii) Has no other residence; <u>and</u> (iii) Lacks the resources or support networks to obtain other permanent housing



Homeless Definition

RECORDKEEPING REQUIREMENTS



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



At Risk of Homelessness

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



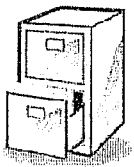
Homeless Definition

CRITERIA FOR DEFINING HOMELESS	Category 1	Literally Homeless	<p>(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> (i) Has a primary nighttime residence that is a public or private place not meant for human habitation; (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); <u>or</u> (iii) Is exiting an institution where (s)he has resided for 90 days or less <u>and</u> who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
	Category 2	Imminent Risk of Homelessness	<p>(2) Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ul style="list-style-type: none"> (i) Residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; <u>and</u> (iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing
	Category 3	Homeless under other Federal statutes	<p>(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:</p> <ul style="list-style-type: none"> (i) Are defined as homeless under the other listed federal statutes; (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; (iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; <u>and</u> (iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers
	Category 4	Fleeing/ Attempting to Flee DV	<p>(4) Any individual or family who:</p> <ul style="list-style-type: none"> (i) Is fleeing, or is attempting to flee, domestic violence; (ii) Has no other residence; <u>and</u> (iii) Lacks the resources or support networks to obtain other permanent housing



Homeless Definition

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	Category 2	Imminent Risk of Homelessness	<ul style="list-style-type: none"> • A court order resulting from an eviction action notifying the individual or family that they must leave; <u>or</u> • For individual and families leaving a <u>hotel</u> or <u>motel</u>—evidence that they lack the financial resources to stay; <u>or</u> • A documented and verified oral statement; <u>and</u> • Certification that no subsequent residence has been identified; <u>and</u> • Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing
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	Category 4	Fleeing/ Attempting to Flee DV	<ul style="list-style-type: none"> • <i>For victim service providers:</i> <ul style="list-style-type: none"> ○ An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker. • <i>For non-victim service providers:</i> <ul style="list-style-type: none"> ○ Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; <u>and</u> ○ Certification by the individual or head of household that no subsequent residence has been identified; <u>and</u> ○ Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.



At Risk of Homelessness

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

Appendix C

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

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

Section 214 of the Housing and Community Development Act of 1980

Section 214 regulates the following HUD funded programs:

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

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

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

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

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

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

The full text of this law can be found at:

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

Appendix D

The Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA)

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

http://www.legalmomentum.org/assets/pdfs/www4_4_appendix_f_interim_guidance_full.pdf

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

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

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

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

Program exempt from the need to verify status:

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

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

Examples for services listed as meeting these criteria are:

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

Appendix E

DEFINITIONS FOR LANCASTER COUNTY WRITTEN STANDARDS AND POLICIES

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

Chronically Homeless

(a) An individual who:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Acronyms

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

CoC – Continuum of Care. See definition above.

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

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

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

HMIS - Housing Management Information System. See definition above.

PIT – See definition above

PSH – Permanent Supportive Housing

Appendix F

Lancaster County Coalition to End Homelessness Prioritization Policy

Helping Those First That Need It The Most.

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

i. Priorities:

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

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

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

Eligibility

All

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

Emergency Shelter

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

Transitional Housing

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

Rapid Re-housing

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

- Use progressive engagement concept

Permanent Supportive Housing (PSH)

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

Targeting

Transitional housing

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

Permanent Supportive Housing

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

Rapid Re-housing

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

Appendix G

Rapid Re-Housing Performance Benchmarks and Program Standards

Introduction

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

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

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

How to Use this Document

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

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

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

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

Performance Benchmarks

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Performance Benchmark #2: Permanent housing success rates

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

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

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

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

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

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

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

Performance Benchmark #3: Returns to Homelessness

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

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

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

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

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

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

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

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

Core Component Program Standards

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

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

Housing Identification

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

Principles

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

Rationale

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

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

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

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

Housing Identification Program Standards (H1. – H9.)

Program Staffing

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

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

Program Policies

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

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

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

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

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

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

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

Program Activities

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

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

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

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

Examples of Meeting Program Standards: Housing Identification

Programs that meet the above standards include those that:

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

Rent and Move-In Assistance

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

Principles

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

Rationale

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

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

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

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

Program Staff

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

Program Policies

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

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

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

Program Activities

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

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

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

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

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

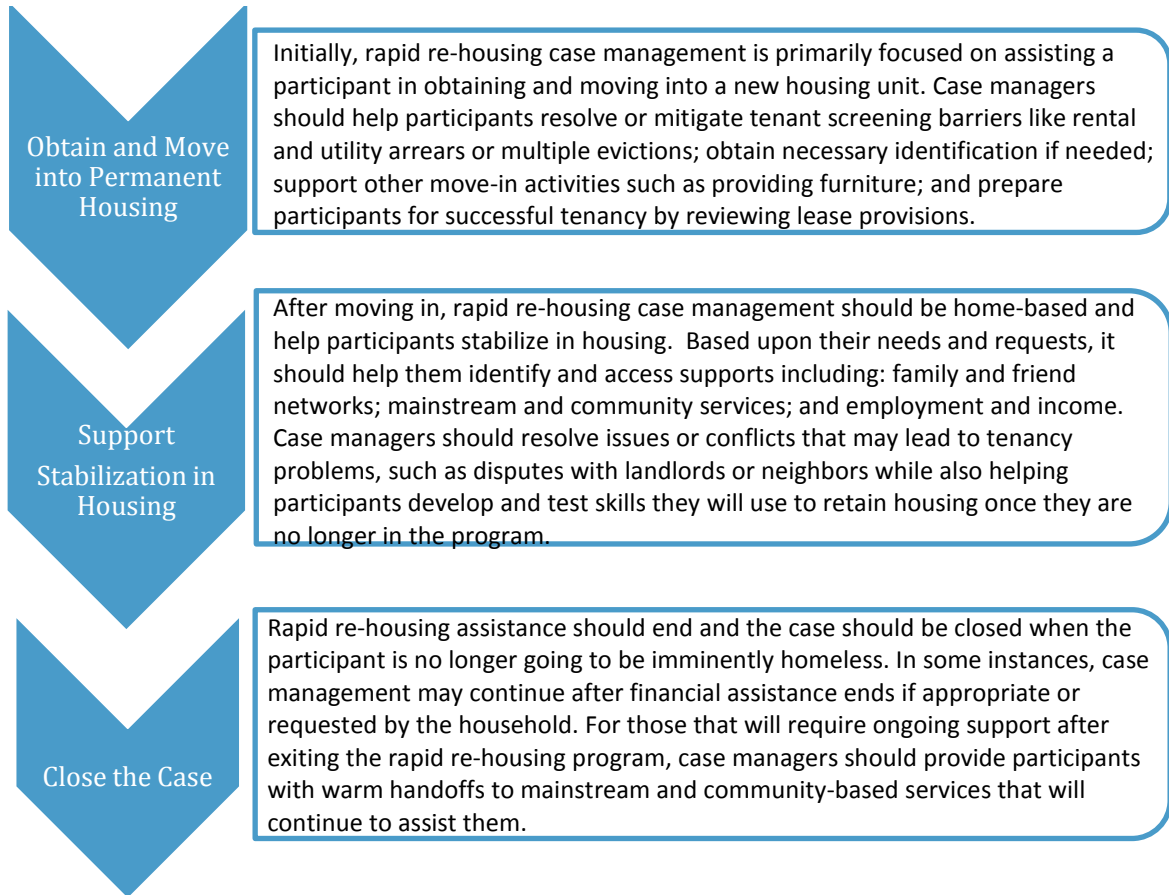
Examples of Meeting Program Standards: Rent and Move-In Assistance

Programs that meet the above standards include those that:

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

Rapid Re-housing Case Management and Services

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



Principles

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

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

Rationale

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

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

Program Staff

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

Program Policies

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

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

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

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

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

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

Program Activities

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

Obtain and Move into Permanent Housing

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

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

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

Support Stabilization in Housing

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

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

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

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

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

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

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

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

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

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

Close the Case

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

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

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

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

Programs that meet the above standards include those that:

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

Program Philosophy and Design

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

Principles

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

Rationale

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

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

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

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

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

Program Staff

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

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

Program Policies

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

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

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

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

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

Program Activities

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

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

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

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

Examples of Meeting Program Standards: Program Philosophy and Design

Programs that meeting the above standards include those that:

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

Appendix G

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

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

Permanent Destinations*

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

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

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

Temporary Destinations

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

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

Other Destinations

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

Institutional Setting

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



The Lancaster County Coalition to End Homelessness

Vision: We will effectively end homelessness in Lancaster County.

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

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

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

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

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

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

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

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

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

Thank you,

Jen Koppel

Reviewed and approved by the Lanc Co MyHome governance board 9-2019

The Lancaster County Coalition to End
Homelessness

PA 510
CONTINUUM OF CARE
STANDARDS AND
POLICIES

Vision: We will effectively end homelessness in Lancaster County.

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

www.lcceh.org

Document Revision History

Date Approved by Leadership Council	Page #	Revision Details
7/10/2018	7	Relocation, Displacement and Acquisition section added.
7/10/2018	15 & 16	RRH CM standards have additional inspection standards.
7/10/2018	15 & 16	Changed RRH (h) and TH (d) from 56% to 80%.
7/10/2018	Appendix A	Updated Annual Performance Measures for 2018.
7/10/2018	Appendix J	Removed Appendix J and replaced with VOH forms.

PA 510 CoC STANDARDS AND POLICIES

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Introduction

The HEARTH Act requires the Lancaster County Continuum of Care (CoC) to have written policies and procedures that govern the provision of assistance to individuals and families under the federally funded Continuum of Care programs in the City of Lancaster and the surrounding Lancaster County (24 CFR 576.400(e)). Lancaster County Continuum of Care is also requiring that these Standards and Policies be followed for all homeless organizations receiving funds through direct HUD funding, CoC sub-recipient funds, and any funding source managed by the Joint Funding Application process (United Way, HAP, ESG, CDBG). Lancaster County's Continuum of Care seeks to establish community-wide expectations on the operations of projects in the county and to ensure that the system is transparent to consumers and service providers who serve households experiencing homelessness. The Lancaster County Continuum of Care will establish a minimum set of standards and expectations in terms of the quality expected of these projects.

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

- Eligibility standards for homeless programs.
- Standards for administration of rental and financial assistance.

All projects (with exception to Prevention and Diversion) must comply in full with the applicable standards described in this document, as well as all HUD regulations and NOFA requirements established for the CoC and ESG Programs. HUD regulations can be found at: <https://www.onecpd.info/resources/documents/CoCProgramInterimRule.pdf>

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

**General
Standards for
all Funded
Projects**

Consequences of Not Meeting Standards

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

Consumer Involvement

Projects are expected to engage consumers in ongoing program evaluation and quality improvement processes. At a minimum each project is required to survey consumers/residents and/or complete documented interviews with current consumers at least annually to obtain feedback on program service quality, the service/housing environment, and opportunities for improvement.

Cultural Competency

All homeless service providers (funded by HUD CoC, ESG and CDBG, United Way, and PA Homeless Assistance Funds) must have established cultural competency policies that provides for at least yearly training for staff that:

- value diversity;
- have the capacity for cultural self-assessment;
- is conscious of the dynamics inherent when cultures interact;
- have institutionalized culture knowledge; and
- have developed adaptations to service delivery reflecting an understanding of cultural diversity.

Data Collection

- a. All homeless service programs (funded by HUD CoC, ESG and CDBG, United Way, EFSP and PA Homeless Assistance Funds) must fully participate in Lancaster's Homeless Management Information System (HMIS) aka Empower Lancaster.
- b. All Homeless service programs will use the LCCEH HMIS Policies and Procedures (Appendix K) to provide specific guidance on collecting data.
- c. All performance measures (provider level, project type and system-wide) will be measured using data directly from the CoC's HMIS system. (See Appendix A)
- d. Programs that are specifically forbidden to use the local HMIS by other statutes or regulations (domestic violence services) cannot participate, but must collect the HMIS required data in a comparable database.
- e. As the HMIS system administrator the LCCEH will assist any CoC organization with HMIS requirements.
- f. Further information about data collection and policies can be found in Appendix I.

Displacement, Relocation, and Acquisition: Please refer to CFR578.83 for involuntary displacement, relocation and acquisition regulations (applying to program closure, organizational bankruptcies or going out of business, etc.)

Optional/Voluntary relocation assistance. A permanent housing program participant can choose to move outside of the CoC's geographic area after consultation with PH providers and maintain PA-510 CoC rental assistance. Participants must comply with all current lease requirements. Approval will be granted on a case by case basis for participants requesting the relocation by the LCCEH Funder's group or other ADHOC committee created by the LCCEH.

Educational Liaison:

The PA-510 Lancaster City/County CoC Education Policy ensures system wide consistency for implementation of the HEARTH Act for providers to guarantee that children are enrolled in school and connected with community resources including early childhood education. (See Appendix D)

Equal Access Regardless of Sexual Orientation or Gender Identity

On September 21, 2016, HUD published a final rule in the Federal Register entitled "Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs." Through this final rule, HUD ensures equal access to individuals in accordance with their gender identity in programs and shelter funded under programs administered by HUD's Office of Community Planning and Development (CPD), which includes ESG and CoC funds. This rule builds upon HUD's February 2012 final rule entitled "Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity" (2012 Equal Access Rule), which aimed to ensure that HUD's housing programs would be open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status. The final rule requires that recipients and subrecipients of CPD funding, as well as owners, operators, and managers of shelters, and other buildings and facilities and providers of services funded in whole or in part by any CPD program to grant equal access to such facilities, and other buildings and facilities, benefits, accommodations and services to individuals in accordance with the individual's gender identity, and in a manner that affords equal access to the individual's family. The PA 510 CoC will apply this rule to all projects funded with CoC, ESG, PA HAP and United Way funding. (See Appendix E)

Evaluating Individuals and Families' Eligibility for Assistance

As set forth in the HEARTH Act, there are four categories of eligibility: 1) Literally Homeless, 2) Imminent Risk of Homelessness, 3) Homeless Under Other Federal Statutes and (4) Fleeing/Attempting to Flee Domestic Violence. The Lancaster County Continuum of Care serves categories 1, 2 and 4. Clients "doubling up" (temporarily living with family and friends) are not eligible for assistance. (Please see attachment J for more information)

Households must be lacking sufficient resources or support networks immediately available to them that would otherwise prevent them from entering or exiting the homeless system.

Clients that are most vulnerable according to their VI-SPDAT score will be prioritized for services. See Appendix L for details.

Grievance and Appeals

See Appendix G & H

Housing First: All projects funded with CoC, ESG, CDBG, HAP and United Way funds shall adopt the Housing First philosophy. Housing First is a proven method of ending all types of homelessness, and is the most effective approach to ending chronic homelessness. Housing First offers individuals and families experiencing homelessness immediate access to permanent affordable, or supportive housing, without clinical prerequisites like completion of a course of treatment or evidence of sobriety and with a low-threshold for entry.

Mainstream Benefits and Resources: Project providers will ensure that all households they are working with are screened for and referred to all mainstream resources they may be eligible for. Notation of these referrals and any necessary follow up will be made in the HMIS system. (See Appendix K for additional information)

Other HUD Requirements:

- a. All HUD Program funded projects are expected to be familiar with and adhere to all HUD requirements as described in the CoC and ESG Program Interim Rule, applicable Notices, and HUD Program NOFA(s) under which the project is funded. This includes, but is not limited to:
 - Participant eligibility.
 - Prioritization.
 - Allowable activities and costs
 - Matching requirements.
 - Calculating occupancy charges and rent.
 - Displacement, relocation, and acquisition.
 - Timeliness standards.
 - Limitation on use of funds.
 - Limitation on use of grant funds to serve persons defined as homeless under other federal laws.
 - Termination of assistance to program participants.
 - Fair Housing and Equal Opportunity.
 - Conflicts of interest.
 - Program income.
 - Recordkeeping requirements.
 - Grant and project changes.
 - Other applicable federal requirements as explained in the CoC Program Interim Rule.
 -

Performance Targets by Population and Program Type: All CoC and ESG-funded programs must fully participate in Lancaster's Homeless Management Information

System (HMIS). All performance targets will be derived from HMIS data. (See Appendix A for by project performance measures for the current year) Programs that are specifically forbidden to use the local HMIS by other statutes or regulations (domestic violence services) cannot participate but must collect the HMIS required data in a comparable database. The LCCEH is the System Administrator for the HMIS and will assist any organization with HMIS requirements.

Plain Language: All policies provided to consumers and all forms signed by consumers must be tested for and pass "plain language" testing and be available in both English and Spanish. Guidance on how to test policies can be located here: <http://www.plainlanguage.gov/howto/guidelines/FederalPLGuidelines/usability.cfm>

Prioritization for Services: All CoC programs must follow the established LCCEH Prioritization Policies that are based on HUD's current prioritization notice(s). (See Appendix L)

Project Rejection/Denial Policies: PA 510 CoC homeless service providers and facilities must adopt policies outlining the acceptable reasons a client referred to a project can be rejected/denied access by that project. Each organization must submit their policy to the Continuum of Care for approval annually by July 1st of each year to Jason Harnish via email: jharnish2@lghealth.org. Any revisions or changes to project policies must be submitted to and approved by the Continuum of Care.

Security & Confidentiality Policies: The address or location of any housing or rental units of any program participant, including youth, individuals living with HIV/AIDS, victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing will not be made public, except as provided under a preexisting privacy policy of the provider and consistent with state and local laws regarding privacy and obligations of confidentiality with written authorization of the person responsible for the operation of the rental unit.

Termination of Services:

- a. Providers may terminate assistance to a program participant who violates program requirements or conditions of occupancy provided that they have a written policy that explains program rules and the termination process. Providers must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.
- b. The Termination Policy must include "due process" procedures. At a minimum, the procedures must consist of:
 - Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance;
 - Written notice to the program participant containing a clear statement of the reasons for termination;
 - A minimum notice period for program termination appropriate in length for the nature of the service being provided;

- A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision;
 - Prompt written notice of the final decision to the program participant; and
 - When terminating hard-to-house populations programs must exercise judgment and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that a program participant's assistance is terminated only in the most severe cases.
- c. Termination under this section does not bar the recipient or sub recipient from providing further assistance at a later date to the same family or individual.
- d. Clients may use the LCCEH client grievance policy to appeal terminations after the provider's process has been completed. (See Appendix H)



Standards by Service Category

Coordinated Entry (aka Coordinated Assessment/CHART)

All coordinated entry programs shall ensure that their programs are in compliance with Notice: CPD-17-01 Notice Establishing Additional Requirements for a Continuum of Care Issued: January 23, 2017 (See Appendix B for details)

Pre-screening

- a. United Way 2-1-1 and street outreach workers will be the first point of entry for all persons seeking shelter services.
- b. The pre-screening will ask for basic demographic information and enter the information into HMIS.
 - Name
 - Social Security Number
 - Date of Birth
 - Race
 - Ethnicity
 - Gender
 - Veteran Status
 - Disabling Condition
 - Residence Prior to Program Entry
 - Housing Status
- c. The pre-screening completed by the United Way 211 will also ask for the following information to determine eligibility for homeless services:
 - Have you or any adult currently living in your household ever served in any branch of the US military?
 - Are you currently living on the street, or in a place that was not really meant for people to live in, or in an emergency or a transitional housing program?
 - Are you in danger of losing your housing?
 - Do you have a court order eviction notice?
 - When will you lose your housing?
- d. Individuals and families who would spend the night in an emergency shelter or on the streets without any assistance will be given 1st preference when scheduling intake assessments.
- e. Persons who are at imminent risk of homelessness within 24 hours will be given 2nd preference when scheduling intake assessments.

Assessments

- a. The assessment process documents the following:
 - Client needs based on assessment;
 - Eligibility based on written program standards for enrollment;
 - Referral, based on available resources; and
 - Disposition based on availability of housing and services in Lancaster County.
- b. Referrals for available service and available "beds or units" are made based on the approved CoC prioritization process. (See Appendix L)
- c. CA staff must provide mobile coordinated assessment services to clients unable or unwilling to utilize traditional access points. Assessments should be provided in the

format and location of the client's choice. Formats can include telephone assessments or in-person assessments.

- d. Coordinated entry assessments should last, on average, no longer than 45 minutes.
- e. Coordinated Entry assessments should be completed within 24 hours of initial referral; ideally the same business day unless the client chooses to schedule the assessment at a later time.
- f. Priority shall be given to people experiencing Category 1 literal homelessness.
- g. While Domestic Violence homeless service providers are exempt from participating in local coordinated assessment efforts, they are required to obtain and maintain similar data in a comparable database and share its aggregate data with the CoC. Coordination efforts between Lancaster's coordinated assessment efforts and DV providers will continue.

Diversion

- a. Diversion services should be provided immediately after the completion of the assessment.
- b. Diversion services will be prioritized for persons that are expected to be homeless within 24 hours.
- c. All diversion services should be used for front-door efforts. In other words, diversion is provided when an individual or family is calling for a shelter bed.
- d. The results of the diversion efforts shall be entered into HMIS.
- e. The amount, type and date of financial assistance or rental assistance provided on behalf of a client shall be entered into Lancaster's HMIS.
- f. No follow-up surveys, calls or other types of contact are required. HMIS data should indicate how and where clients exited the system.

Emergency Shelter

- a. Shelter facilities may accept clients that are not HUD-defined homeless but they must administratively segregate those clients so that HUD funds are not used for non-HUD-defined homeless clients. In order for a shelter, that does not receive government funding, to be included in the Housing Inventory Chart, 51% or more clients must be HUD-defined homeless.
- b. Shelter personnel must complete Homeless Verification forms for consumers in their shelters upon request.
- c. Emergency shelters funded with federal funds must be a low-demand facility. In other words, there shall be no requirements for income or sobriety in order to access or maintain shelter.
- d. Emergency shelter providers may not exit clients from emergency shelters to the streets for not obtaining permanent housing within the guideline of three (3) months if clients are enrolled and engaged in permanent housing programs (RRH & PSH).

- e. Emergency shelter facilities shall have a goal of an average length of stay of no more than 30 days.

Permanent Supportive Housing (PSH)

- a. In order to be eligible for PSH, at least one member of the household must have a disability of long duration, verified either by Social Security or a licensed professional that meets the state criteria for diagnosing and treating that condition.
- b. PSH must prioritize chronically homeless individuals and families for vacant units. The Coordinated Entry staff maintains a list (By Name list) of the most vulnerable chronically (or at risk of becoming chronically) homeless individuals and families.
- c. All funded providers must fill their program's vacant PSH beds through the Coordinated Access prioritization process outlined in Appendix L. Non-HUD funded CoC providers are strongly encouraged to fill their vacancies from this list as well.
- d. All persons served must have a completed Homeless Verification form in their file that verifies that the individual or family were homeless the night before PSH program entry.
- e. PSH programs may NOT have any requirements that are not in a standard lease. (i.e. no preconditions such as income or sobriety)
- f. People referred to PSH must have been living in a place not meant for human habitation, in emergency shelters, or institutions.
- g. Potential program participants coming from institutions must have previously lived in a place not meant for human habitation or in an emergency shelter prior to entering the institution or transitional housing. Additionally, people from institutions must have been in the institution for fewer than 90 days.
- h. Households waiting for PSH should be served in Rapid Re-Housing programs while waiting for an available PSH unit.
- i. All new PSH projects considered for funding must be tenant based or scattered site. Current project based PSH providers should consider changing current place-centered PSH to tenant based or scattered site.
- a. At least 56% of all program participants will be referred to mainstream benefits, which must be tracked in HMIS.

Prevention

- a. Any client receiving assistance must have proof of residence within Lancaster County and/or the City of Lancaster.
- b. Clients receiving homeless prevention services must have total household incomes less than 30 percent of Area Median Income (Median Family Income) for Lancaster Metropolitan Statistical Area (MSA) at initial assessment, AND who meet the criteria under the "at-risk of homelessness" definition, or who meet the criteria in paragraph

(2), (3), or (4) of the "homeless" definition. ESG funds require 30% or less of AMI. All other funds should be case by case.

- c. Those clients that have been homeless previously (and received rapid rehousing assistance) should be prioritized for homeless prevention services because they are statistically shown to be more likely to become homeless.
- d. The amount, type and date of rental assistance provided on behalf of a client shall be entered into Lancaster's HMIS. All homeless prevention consumers must have reassessments at a minimum of every three (3) months in order to continue receiving assistance.
- e. Even if only a minimal amount of financial assistance is provided—such as utility arrears/payments or housing stability case management, the HUD Housing Quality Standards apply to the unit and must be documented in the program participant's file.
- f. At least 56% of all program participants will be referred to mainstream benefits, which must be tracked in HMIS.

Rapid Re-housing (RRH)

- a. All households served must have a completed Homeless Verification form in their HMIS file that verifies that the individual or family were homeless *the night before program entry*.
- b. Rapid re-housing is not designed to comprehensively address a recipient's overall service needs or poverty. It is designed to assist persons back into permanent housing as quickly as possible.
- c. Caseload Ratios
 - Case Management Services: Staff serving clients maintaining housing should maintain a minimum caseload ratio of 40 clients to one staff member.
 - Housing Location Services: Staff serving initial clients seeking housing should maintain a minimum caseload ratio of 25 clients to one staff member.
- d. Low Barrier Entry: Conditions of service concerning substance abuse or other aspects of clients' lives shall not be part of rapid re-housing programs. Clients are required to abide with the terms of the lease and no more.
- e. All rapid re-housing programs shall be tenant-based. No rapid re-housing programs shall be project based.
- f. All RRH case managers/programs must utilize the staff at the CoC Housing Location program (Community Housing Solutions (CHS)) to provide at a minimum the HUD quality standards inspection, rent reasonableness determination and authorization of initial rents/security deposits.
- g. Households waiting for PSH should be served in RRH programs while waiting for an available PSH unit.

- h. At least 80% of all program participants will be referred to mainstream benefits, which must be tracked in HMIS.
- i. Provision of Financial and Rental Assistance
- There shall NOT be an income limit for receiving rapid re-housing services. The goal is to move persons experiencing homelessness out of shelter. If diversion is done properly, higher income persons will likely not end up in shelter.
 - Rapid re-housing activities can only be provided to persons in Category 1 and 4. (See attachment J)
 - Rapid re-housing services shall not guarantee financial assistance to landlords on behalf of clients.
 - The provision of financial assistance or rental assistance on behalf of a household must be calculated monthly based on financial need. Every three (3) months after enrollment, each household shall be carefully evaluated for the need for further financial assistance or rental assistance. In no case shall rental assistance be provided on behalf of a client for more than 24 months during any three-year period (24 CFR 576.106).
 - The amount, type and date of financial assistance and rental assistance provided on behalf of a client shall be recorded in Empower Lancaster-HMIS.
 - Amounts for financial assistance and rental assistance should be determined on the same basis across all programs. The basis for the provision of financial services should be flexible, using a case by case basis implementing the same budgeting format. (Example, no household pays more than 70% of its gross income on housing)
 - Financial assistance and rental assistance amounts should not have a maximum amount. The amounts should be determined solely on a case by case basis determined by need.
 - The *goal* for the **average** cost per household for rapid re-housing activities (rental assistance (including utilities), financial assistance AND the cost of providing services) should not exceed \$5,000 for individuals and \$12,500 for families.
 - The standard for the length of time from the determination of homelessness to placement into permanent housing is no more than an average of 45 days. The goal for the length of stay is 30 days.
 - Additional eligible costs may include moving costs such as truck rentals, hiring a moving company, and temporary storage fees not exceeding 3months
- j. Case Management
- Participants must meet with a case manager at least once per month to reassess budget and address any issues that affect continued household stability.
 - Case managers will meet with participants in their unit at least quarterly, at which time a visual HGS inspection will be completed and documented in the participant's HMIS file.

- A full HQS inspection must be completed and documented in the participant's HMIS file yearly.
- Follow-up case management can be provided for up to six months after a financial subsidy ends. Case management services after the client has been housed is limited to evaluating progress and addressing crises and monitoring housing stability.
- Income eligibility must be determined when the household reaches their twelfth month of service in the program. Household income for ESG requirements must be under 30% Area Median Income (AMI) for household to remain eligible for services and/or rental assistance beyond twelve (12) months. Other funding streams should be considered case by case.
- Organizations providing rapid re-housing services shall follow all requirements for HUD Housing Quality standards, rent reasonableness and if applicable, lead based paint.
- Even if only a minimal amount of RRH assistance is provided—such as security deposit and first month's rent or housing stability case management (Services), the HUD Housing Quality Standards apply to the unit and must be documented in the program participant's file.
- Per ESG requirements: At the annual assessment client households must fall BELOW 30% Median Family in order to continue receiving case management services

Street Outreach

- a. Workers will be an extension of the coordinated assessment program and will be expected to complete a pre-screening and assessment with individuals as they encounter them reducing the number of contacts individuals will need to get into the system.
- b. Street outreach should be targeted/provided to individuals or families living in places not meant for human habitation.

Transitional Housing (TH)

- a. Transitional housing should be designated for high barrier households. Transitional housing is the activity of last resort when other efforts have not resulted in placement in permanent housing.
- b. In order for a transitional housing facility to be included in the LCCEH HUD Housing Inventory Chart (HIC), it must serve 51% or more clients that meet the HUD definition of homeless. Transitional housing providers must document that clients do or do not meet the HUD definition of homelessness. Clients not meeting the HUD definition of homelessness shall be entered into designated non HUD programs in HMIS.
- c. HUD requires that households in transitional housing CANNOT-qualify for *permanent supportive housing* unless prior to the TH placement, they were living on the streets, in an emergency shelter or a safe haven.
- d. At least 80% of all program participants will be referred to mainstream benefits, which must be tracked in HMIS.

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.

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

INCOME AND BENEFITS			
	<i>Count</i>	<i>Percent</i>	<i>Margin of Error</i>
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)

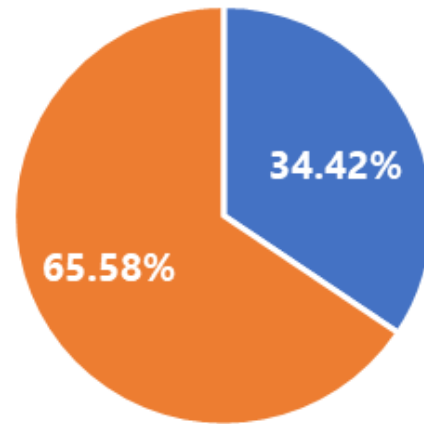
EMPLOYMENT STATUS			
	<i>Count</i>	<i>Percent</i>	<i>Margin of Error</i>
Population 16 years and over	46285	100%	X
Total Population in Labor Force	31631	68.3%	±982
Employed	29407	63.5%	±1,047
Unemployed	2213 	4.8%	±411

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

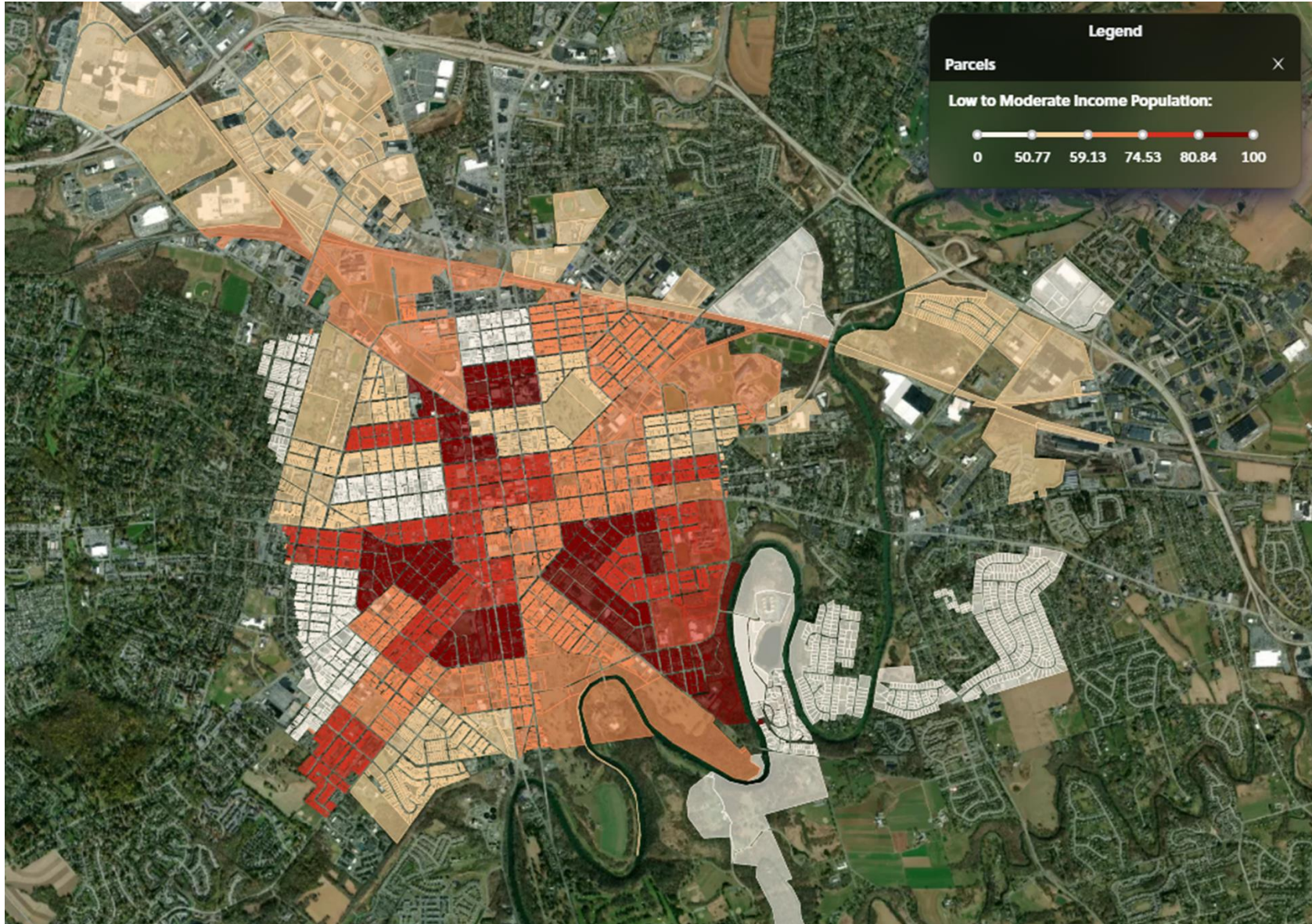
(U.S. Census Bureau, 2021 American Community Survey)



- 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)

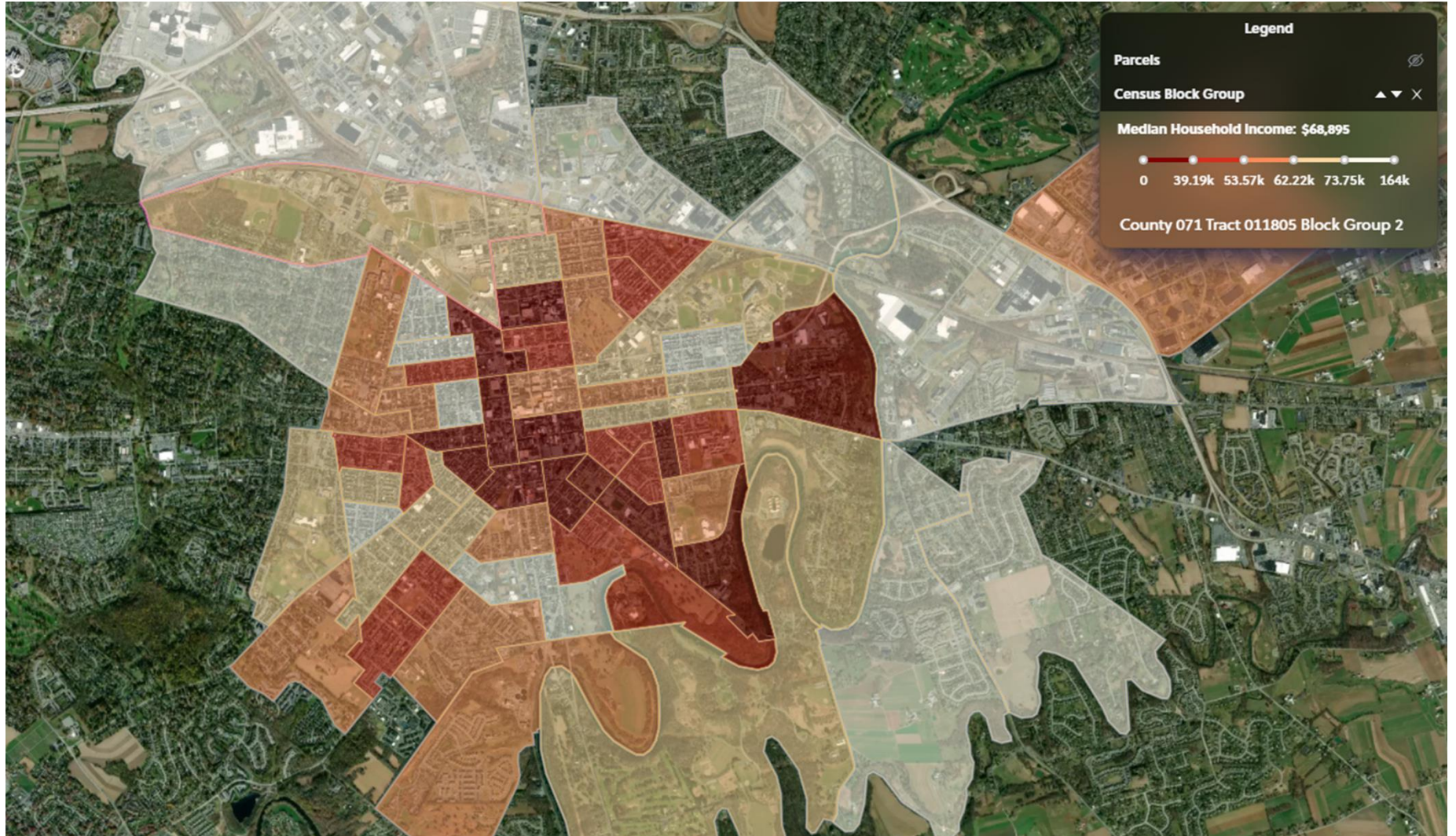
City of Lancaster U.S. Census Bureau Demographic Information (2021 Inflation Adjusted Dollars)

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





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.

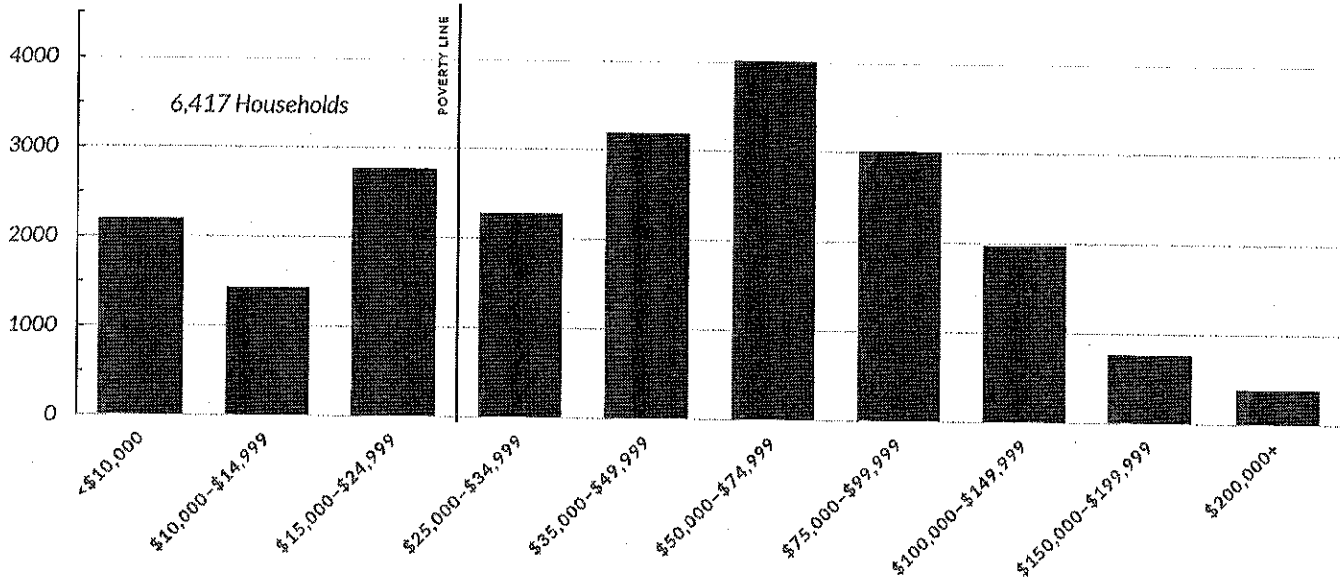
QUANTITATIVE POLICY TARGETS

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*]

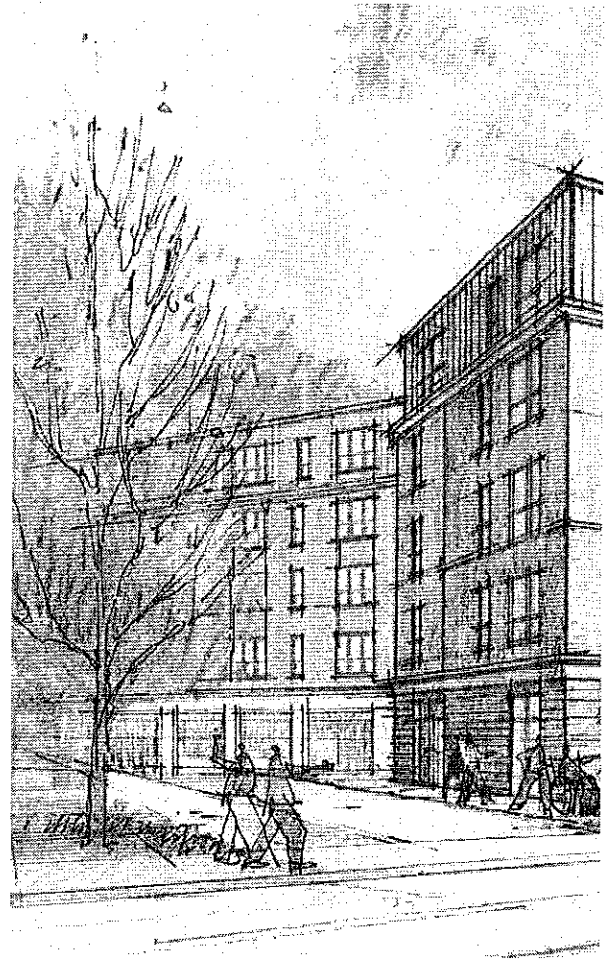
Protect, maintain, and improve the quality of existing housing to help keep households safe and affordable.

- 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)

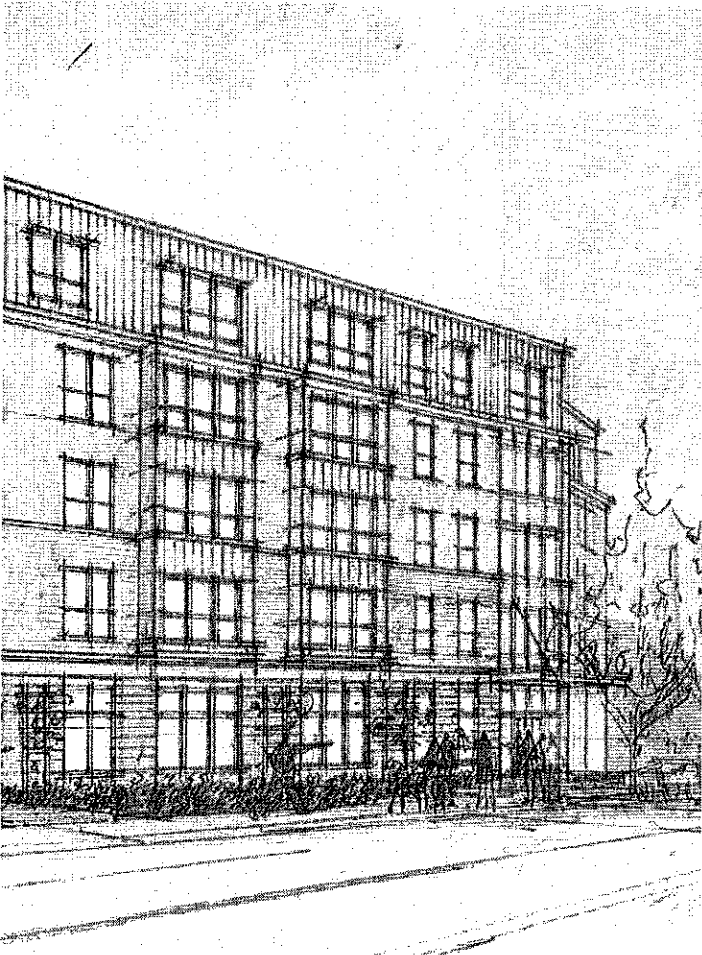
GOAL 4 INNOVATE [~100 units]

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	LEAs	Lancaster Equity Agencies
CHDOs	Community Housing Development Organizations	LCMH	Lanc Co MyHome
LCA	Lancaster City Alliance	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
120 North Duke Street • P.O. Box 1599
Lancaster, PA 17608



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 polices currently exist (formally or informally) throughout Lancaster City government?
3. How do the current services and polices 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.

LANCASTER COUNTY & CITY



2021

Analysis of Impediments to Fair Housing Choice

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**Analysis of Impediments to Fair Housing Choice
Lancaster County and City of Lancaster, Pennsylvania
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I. Introduction to the Analysis of Impediments to Fair Housing Choice

The Fair Housing Act of 1968 mandates that the U.S. Department of Housing and Urban Development (HUD) “affirmatively further fair housing” through its funded programs. HUD in turn requires funding recipients (such as the City of Lancaster and the County of Lancaster) to conduct fair housing planning to take proactive steps that will reduce discrimination in housing markets and lead to better living conditions for minority groups and vulnerable populations.

HUD mandates that each jurisdiction receiving HUD funds must complete an *Analysis of Impediments to Fair Housing (AI)* to analyze a series of fair housing issues, identify contributing factors and impediments and most importantly, identify meaningful actions to create a more integrated community with improved access to opportunity for all.

In 2016, HUD launched a new approach to identify fair housing challenges, called the *Assessment of Fair Housing (AFH)*. This approach encouraged communities to embrace a more comprehensive planning process, focusing on economic, as well as housing barriers. In January 2018, HUD suspended the AFH requirements, reverting to the AI approach. This was done to give communities more time to adjust to the new AFH format.

This Analysis of Impediments (AI) is an update of Lancaster City and Lancaster County’s Plan published most recently in 2013. The purpose of the AI is for Lancaster County (County) and the City of Lancaster (City) to evaluate the housing characteristics, to identify blatant or defacto impediments to fair housing choice. It will also establish a strategy for the expansion of fair housing opportunities throughout the county and city.

Lancaster County and the City of Lancaster are proceeding with a multi-jurisdictional AI that includes many aspects of the AFH process. The overall goal of this approach is to help communities improve economic conditions for all residents.

The Housing and Community Development Act of 1974, the National Affordable Housing Act, as amended, along with the McKinney-Vento Homeless Assistance Act, as amended, govern the administration of Community Development Block Grant Program (CDBG), HOME Investment Partnership Program (HOME), and Emergency Solutions Grant (ESG) and require participating jurisdictions to certify that they will affirmatively further fair housing. This means the jurisdictions will:

1. Conduct an analysis of impediments to fair housing choice,
2. Take appropriate actions to overcome the effects of impediments identified through that analysis, and
3. Maintain records reflecting the analysis and actions.

An AI is a review of impediments or barriers that impede fair housing choice and will provide a basis for fair housing planning, provide essential information to housing stakeholders and assist in building public support for fair housing efforts.

The legislative basis for HUD's review of fair housing practices in communities that receive federal funds is the Civil Rights Act of 1968. An amendment to Title VIII of the Civil Rights Act was later passed; this amendment, known as the Fair Housing Act of 1988, expanded the scope of coverage of the law to include, as protected classes, families with children and persons with disabilities.

The Fair Housing Act covers most housing. However, in some circumstances, the Act exempts the following:

1. Owner-occupied buildings with not more than four units,
2. Single family housing sold or rented without the use of a broker, and
3. Housing operated by organizations or private clubs that limit occupancy to members.

Impediments to fair housing choice are defined as any actions, omissions, or decisions taken because of race, color, religion, gender, disability, familial status, or national origin that restrict housing choice or the availability of housing choice.

A. Methodology

HUD requires that an AI include:

1. An analysis of demographic, income, housing and employment data;
2. An evaluation of the fair housing complaints filed in the jurisdiction;
3. A discussion of impediments, if any, in:
 - a. The sale or rental of housing
 - b. Provision of brokerage services
 - c. Financing
 - d. Public policies
 - e. Administrative policies for housing and community development activities that affect fair housing resources;
 - f. Assessment of current fair housing resources; and
 - g. Conclusions and recommendations.

The AI utilizes publicly available data from several sources, including:

1. Census and other demographic data;
2. Consolidated Plan and associated planning documents;
3. Fair housing complaint data from HUD;
4. Information from Lancaster Housing Opportunity Partnership's (LHOP) Housing Equity and Equality Institute (HEEI);
5. Internet resources; and
6. local resources.

In addition to the identification of impediments, jurisdictions are required to develop methods to address the issues that limit the ability of residents to rent or own housing, regardless of their inclusion in a protected class.

Fair housing choice is defined as the “ability of persons, regardless of race, color, religion, gender, national origin, familial status, or handicap, of similar income levels to have available to them the same housing choices.” The AI encompasses the following five areas:

1. The sale or rental of dwellings (public or private),
2. The provision of housing brokerage services,
3. The provision of financing assistance for dwellings,
4. Public policies and actions affecting the approval of sites or other building requirements used in the approval process for the construction of publicly assisted housing, and,
5. The administrative policies concerning community development and housing activities, which affect opportunities for minority households to select housing inside or outside areas of minority concentration.

In a Final Rule, effective March 5, 2012, HUD implemented a policy to ensure that its core programs are open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status. HUD implemented this policy in reaction to evidence that lesbian, gay, bisexual and transgender (LGBT) individuals and families are being arbitrarily excluded from housing opportunities in the private sector. This final rule prohibits discrimination against these groups by any housing provider receiving HUD funding and those who are insured by the Federal Housing Administration, including lenders.

The Pennsylvania Human Relations Act, as amended, prohibits housing discrimination based on race, color, sex, religion, national origin, ancestry, handicap or disability, guide dogs, support animals, age (40 and above), pregnancy, familial status (families with children under the age of 18), use of a guide or support animal due to blindness, deafness, or physical disability or the disability of an individual with whom the person is known to have a relationship or association. Pennsylvania’s law differs primarily in that the age category is lowered to 40 years of age.

B. Development of the Plan

In partnership with the City, the Redevelopment Authority created an AI Planning Committee that guided the development of the AI. It consisted of the following participants:

- Susannah Thorsen, City of Lancaster
- Adrian Garcia, Lancaster Housing Opportunity Partnership (now employed at the Pennsylvania Human Relations Commission)
- Britany Mellinger, Director, Housing Equity and Equality Institute, Lancaster Housing Opportunity Partnership (LHOP)
- Emma Hamme, Lancaster County Planning Commission (now employed at the City of Lancaster)
- Jo Raff, Community Basics, Inc.
- Aimee Tyson, Lancaster County Redevelopment Authority

Special thanks to Rose Long of the Lancaster County Planning Commission for providing much of the data in this report.

The Planning Committee, the Data Collection Committee and the Outreach Committee all began meeting in the summer of 2019 and worked through early 2020. Then the world changed due to the COVID-19 pandemic in March 2020. Both the City and the County were focused on administering the federal CARES funds to address critical crisis needs and the plan was stalled. Our country is seeing the light at the end of the tunnel with the distribution of vaccines. While most residents are still seeing the dire impact of the pandemic on their lives, their housing and their incomes; federal, state and local resources have been distributed to attempt to meet the need. Eviction moratoriums were put in place by the federal, state and local governments to keep people in their homes.

Pre-COVID, the Redevelopment Authority and the City of Lancaster completed a comprehensive review of demographics for the County and the City including but not limited to population, housing, income and employment. Public policies were also reviewed to determine if a disparate impact was created for fair housing. The AI Planning Committee analyzed the demographic information and public policies to finalize the list of impediments to fair housing. Given the massive upheaval caused by the virus, most of the data collected before the pandemic is irrelevant. However, it is the best we have. The AI Planning Committee has attempted to supplement the pre-COVID data with recent information but that too is limited and not necessarily a predictor of the future housing dynamics.

Citizen Participation

The Outreach Committee met with various social service entities to discuss the issue of impediments to fair housing at the following dates and locations:

July 25, 2019 – Columbia Connections

August 28, 2019 – Together Initiative Network

September 24, 2019 – Elanco Community Collaboration

October 7, 2019 – Elizabethtown Area Hub

October 8, 2019 – Northern Hub

November 18, 2019 – Homeless Service Provider Network

November 21, 2019 – Solanco Family Life Network

December 6, 2019 – Coalition for Sustainable Housing

In the Fall of 2019, the Outreach Committee created and distributed a survey for social service professionals that work with vulnerable clients to obtain feedback on housing choices. A summary of responses is included in the Appendix.

Comment boxes were set up at libraries and social service agencies to allow citizens to provide input on what prevents them from living where they want to live. A summary of comments is included in the Appendix.

The Analysis of impediments to Fair Housing was released on February 12, 2021 along with an “Citizen Summary”. The notification of its release was made on www.lchra.com, www.cityoflancasterpa.com, partner websites, Facebook pages and the local newspaper (LNP) and Lancasteronline.com. The County and City held a virtual public hearing on March 2, 2021. A more informal virtual meeting was held on March 4, 2021, 2021 to obtain feedback on the plan from the landlords, service providers and general community members. The recorded meeting was then posted on Facebook to obtain further comments by those that were unable to attend the virtual meeting.

C. Definitions

1. Consolidated Plan

The Consolidated Plan is designed to help states and local jurisdictions to assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions. The consolidated planning process serves as the framework for a community-wide dialogue to identify housing and community development priorities that align and focus funding from three HUD formula block grants programs: CDBG, HOME, and ESG.

2. Cost burdened

Families that pay more than 30 percent of their income for housing are considered cost burdened and may have difficulty affording necessities such as food, clothing, transportation, and medical care.

3. Disability

Federal laws define a person with a disability as “Any person who has physical or mental impairment that substantially limits one or more major life activities; has a record of such impairment; or is regarded as having such an impairment.”

4. Housing Need

Housing needs are defined as households with any housing problems such as a cost burden greater than 30% of income and/or overcrowding and/or without complete kitchen or plumbing facilities.

5. Impediments

Defined as: any actions, omissions, or decisions taken because of color, race religion, gender, disability, familial status, or national origin that restrict housing choice or the availability of housing choice.

6. Infrastructure

The term infrastructure refers to the substructure or underlying foundation or network used for providing goods and services; especially the basic installations and facilities on which the continuance and growth of a community, State, etc. depend. Examples include roads, water systems, communications facilities, sewers, sidewalks, cable, wiring, schools, power plants, and transportation systems.

7. Protected Class

Classes of the population that are protected under the Federal Fair Housing Act are: race, color, religion, gender, national origin, disability (added in 1988), and familial status (having children under 18 in a household, including pregnant women, added in 1988).

8. Publicly Supported Housing

The monthly cost to the tenants is subsidized by federal state or other programs including but not limited to Housing Choice Vouchers, Section 811 Vouchers, etc.

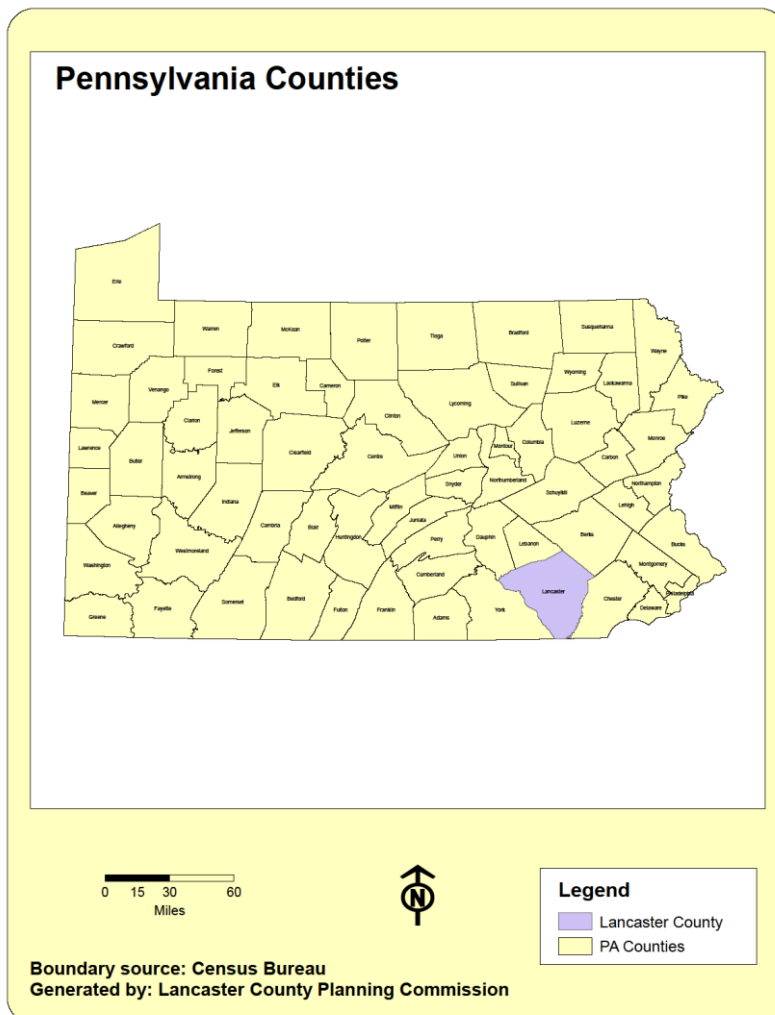
II. Data Analysis

A. Background Information – Understanding the social, racial, economic and other characteristics of a population, as well as how those characteristics change over time, is crucial to evaluating current and future housing needs. Analyzing demographic trends can indicate places or people who may not be served by the housing market and who need assistance or intervention. The goal of data analysis is to inform future strategies to increase access to housing opportunities by all residents.

1. Overview of Lancaster County and City of Lancaster

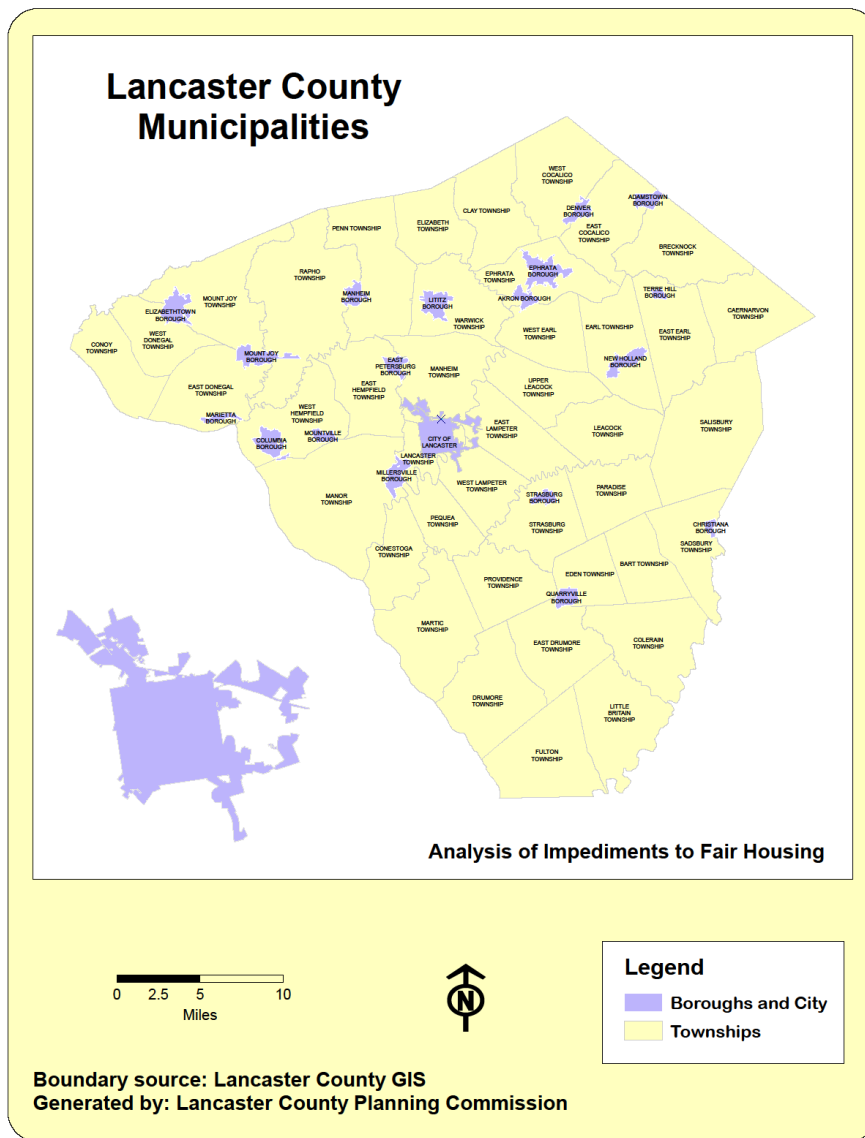
Lancaster County is in south central Pennsylvania and is bordered by York, Dauphin, Lebanon, Berks and Chester counties. The county also borders the State of Maryland to the south. It is 984 square miles and with the City of Lancaster, forms the Lancaster Metropolitan Statistical Area (MSA). The city of Lancaster is 7.3 square miles.

Figure 1. Pennsylvania Counties



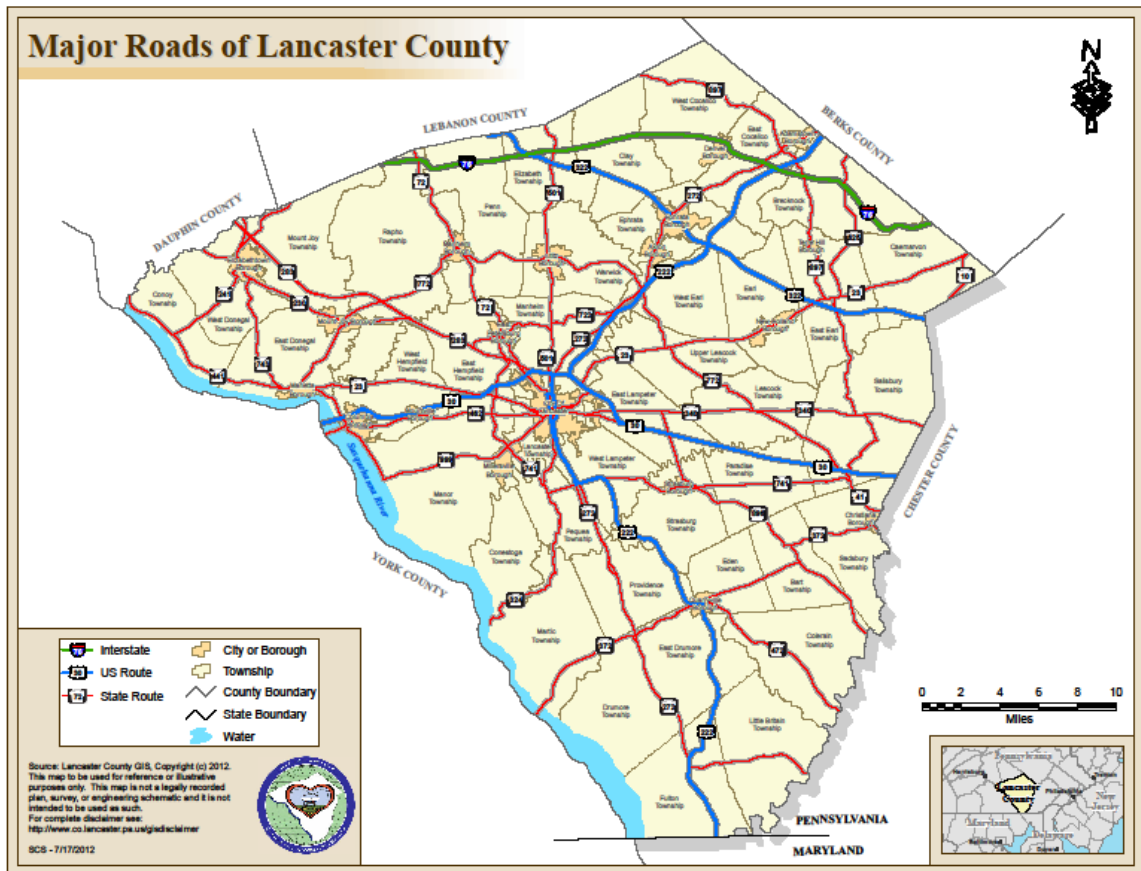
Lancaster County is comprised of 60 municipalities; each with their own subdivision, zoning and comprehensive plans. The 60 municipalities consist of 41 townships, 18 boroughs and the City of Lancaster. Lancaster County has a mix of urban, suburban and rural areas. The city of Lancaster is in the center of the county. Most of the suburban development occurs outside of the city and surrounding boroughs. The perimeter of the count is predominantly agricultural and rural. The County is well known for its Amish residents that live predominantly on farms are in the eastern and southern parts of the county.

Figure 2. Municipalities in Lancaster County



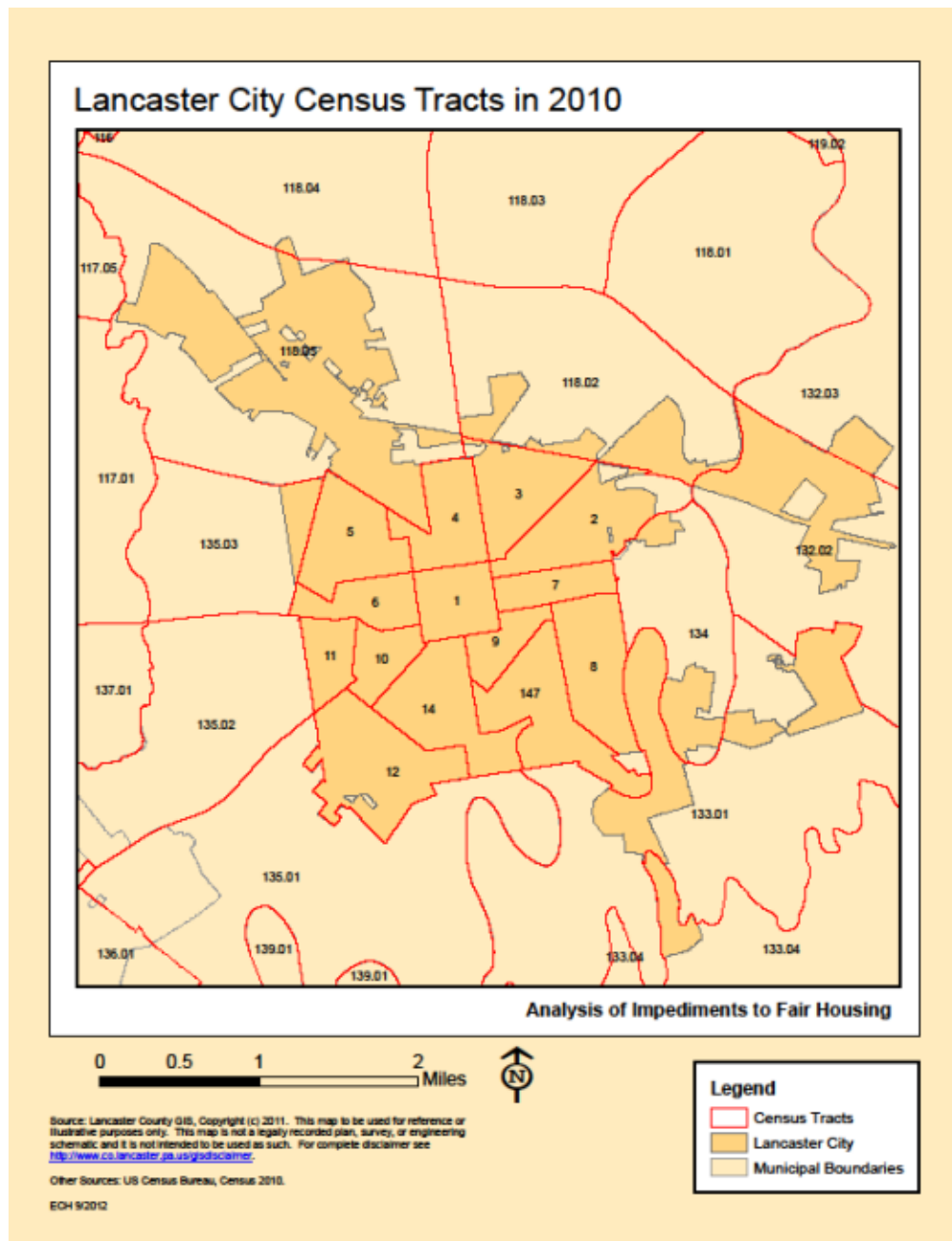
Lancaster County is bisected to the north by the Pennsylvania Turnpike (Interstate 76) and through the middle by US Route 30 (Lincoln Highway). Route 283 runs through the northwestern part of the County and Route 322 runs in the northeast. Route 222 runs north and south through the county. Figure 3 illustrates these and other major travel routes in the County.

Figure 3. Major Transportation Routes in Lancaster County



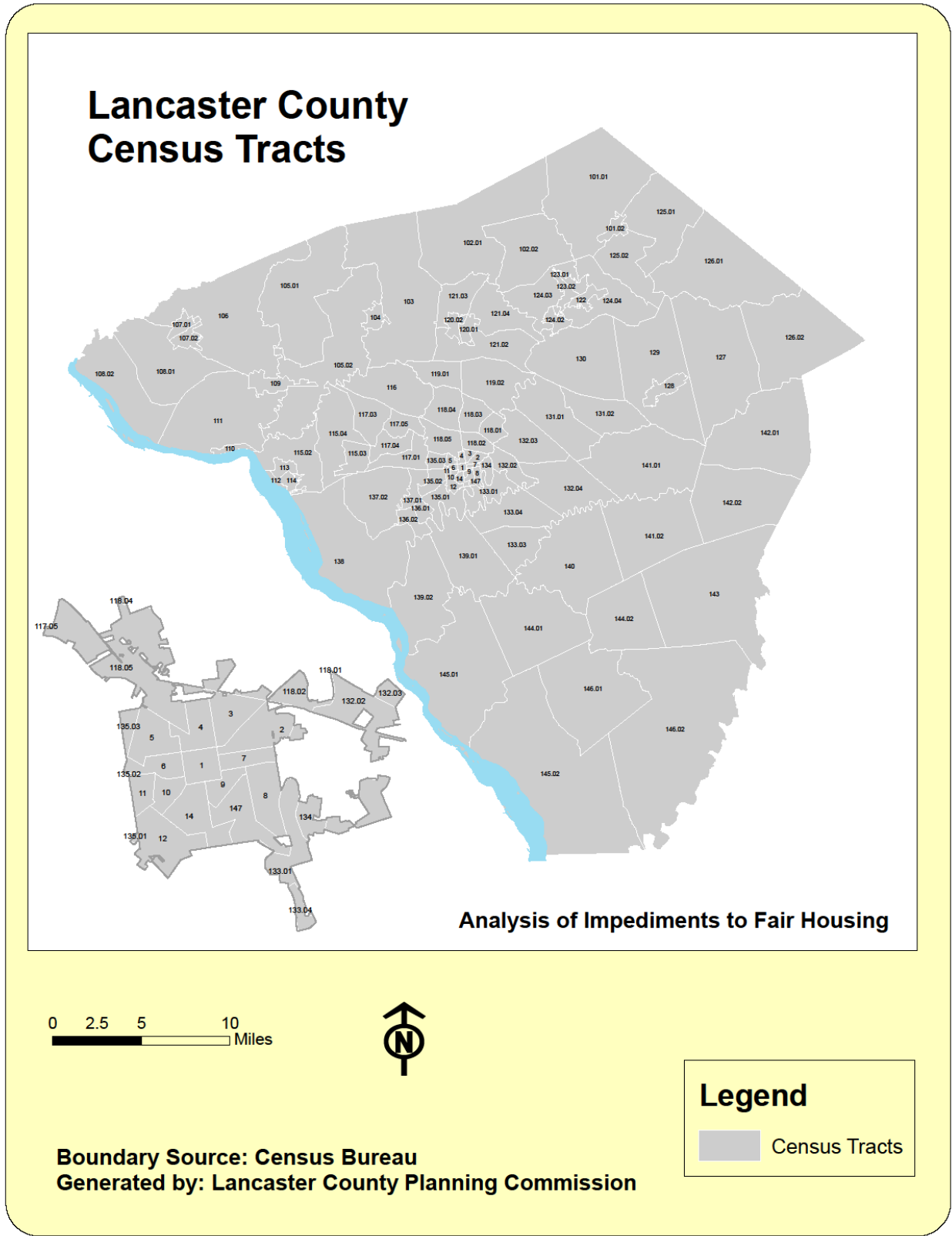
Data for the County and City is frequently made available through the Census in geographic areas called census tracts. Figure 4 is a map of the census tracts in the City.

Figure 4. Lancaster City Census Tracts



Source: Lancaster County GIS; U.S. Census Bureau, 2010 Census

Figure 5. Census Tracts in Lancaster County



2. Demographic Data

a. Population

The 2013-2017 American Community Survey (ACS) 5-Year Estimates indicate that Lancaster County's population is 536,494.

Table 1. Municipal Population in Lancaster County

Municipality	2010	ACS Estimate	Percent Change	Municipality	2010	ACS Estimate	Percent Change
Adamstown Borough	1,772	2,196	24%	Lititz Borough	9,369	9,269	-1%
Akron Borough	3,876	3,975	3%	Little Britain Township	4,106	4,217	3%
Bart Township	3,094	3,286	6%	Manheim Borough	4,858	4,881	0%
Brecknock Township	7,199	7,432	3%	Manheim Township	38,133	39,568	4%
Caernarvon Township	4,748	4,794	1%	Manor Township	19,612	20,571	5%
Christiana Borough	1,168	954	-49%	Marietta Borough	2,588	2,615	1%
Clay Township	6,308	6,780	7%	Martic Township	5,190	5,232	1%
Colerain Township	3,635	3,808	5%	Millersville Borough	8,168	8,366	2%
Columbia Borough	10,400	10,430	0%	Mount Joy Borough	7,410	8,071	9%
Conestoga Township	3,776	3,866	2%	Mount Joy Township	9,873	10,790	9%
Conoy Township	3,194	3,418	7%	Mountville Borough	2,802	2,848	2%
Denver Borough	3,861	3,877	0%	New Holland Borough	5,378	5,445	1%
Drumore Township	2,560	2,631	3%	Paradise Township	5,131	5,513	7%
Earl Township	7,024	7,177	2%	Penn Township	8,789	9,337	6%
East Cocalico Township	10,310	10,460	1%	Pequea Township	4,605	4,752	3%
East Donegal Township	7,755	8,202	6%	Providence Township	6,897	6,991	1%
East Drumore Township	3,791	3,849	2%	Quarryville Borough	2,576	2,736	6%
East Earl Township	6,507	6,792	4%	Rapho Township	10,422	11,654	12%
East Hempfield Township	23,522	24,218	3%	Sadsbury Township	3,395	3,483	3%
East Lampeter Township	16,242	16,942	4%	Salisbury Township	11,062	11,385	3%
East Petersburg Borough	4,606	4,528	-2%	Strasburg Borough	2,809	2,907	3%

Municipality	2010	ACS Estimate	Percent Change	Municipality	2010	ACS Estimate	Percent Change
Eden Township	2,094	2,039	-3%	Strasburg Township	4,182	4,282	2%
Elizabeth Township	3,886	3,963	2%	Terre Hill Borough	1,295	1,359	5%
Elizabethtown Borough	11,545	11,579	0%	Upper Leacock Township	8,708	8,879	2%
Ephrata Borough	13,394	13,785	3%	Warwick Township	17,783	18,474	4%
Ephrata Township	9,400	10,189	8%	West Cocalico Township	7,280	7,412	2%
Fulton Township	3,074	3,159	3%	West Donegal Township	8,260	8,645	5%
Lancaster City	59,322	59,556	0%	West Earl Township	7,868	8,193	4%
Lancaster Township	16,149	17,038	6%	West Hempfield Township	16,153	16,426	2%
Leacock Township	5,220	5,479	5%	West Lampeter Township	15,209	15,791	4%

Source: Census 2010 and 2013-2017 ACS 5-Year Estimates

Relying on percent change by municipality can be misleading. For example, Adamstown saw a 24% increase in population; however, it was only a net gain of 424 people. Ephrata Township saw an increase of 789 people and only had a percent increase of 8%.

While the percent change has grown steadily over the past three decade, the numeric increased remain at approximately 40,000 additional residents per decade.

Claritas, a data resource used by the Lancaster County Planning Commission, projects that by 2024 the population for Lancaster County will be 561,092 or 2.43% which indicates a reduction in population growth rates from previous projections. Claritas also projects that the City of Lancaster will grow by 1.51% in 2024 which is a slowing of growth rates from previous years.

Interpretation 1: The County and City are growing although at a slower rate than in previous years. More people required an increased emphasis on education about fair housing and increased access to persons with questions about fair housing.

b. Households and Families

There were an estimated 198,565 households in Lancaster County according to the 2013-2017 ACS 5-Year Estimates. The household size is slightly higher than the state at 2.64 persons per household but on par with the United States.

There are 139,173 families in Lancaster County; the average family size is 3.15.

Table 2. 2019 Estimated Households by Household Size for Lancaster County and City

Household Size	Lancaster City		Lancaster County	
	Number	Percent	Number	Percent
1 Person Household	7,356	32.37	50,713	24.67
2 Person households	6,349	27.94	72,912	35.47
3 Person Households	3,515	15.47	32,755	15.93
4 Person Household	2,714	11.94	26,562	12.92
5 Person Household	1,449	6.38	12,368	6.02
6 Person Household	733	3.23	5,428	2.64
7 or more person Household	607	2.67	4,842	2.36

Source: Claritas

Claritas estimates that the average household size in 2019 was 2.6 for the County and 2.55 for the City of Lancaster.

Claritas projects that the number of households in Lancaster County will rise to 211,073 in 2024 which is a 2.67% increase over the estimated number in 2019 of 205,580. Claritas projects that the number of households in the City of Lancaster will rise to 23,152 in 2024 which is 1.89% higher than the 2019 estimate of 22,723.

Table 3. 2019 Estimated Households by Presence of Own Children

	Lancaster City		Lancaster County	
	Number	Percent	Number	Percent
	13,112		143,716	
Married Couple, own children	2,868	21.87%	46,044	32.04%
Married-Couple, no own children	3,996	30.48%	69,858	48.61%
Male Householder, own children	720	5.49%	4,163	2.90%
Male Householder no own children	677	5.16%	3,941	2.74%
Female Householder, own children	3,143	23.97%	11,339	7.89%
Female householder, no own children	1,708	13.03%	8,371	5.82%

Interpretation 2: It is significant that the 2019 Estimates from Claritas show a significant difference between the City and the County in the percent of Female Householders with their own children. Lancaster City is estimated to have 23.97 % of householders headed by females with their own children while the County shows only 7.89 of the same. Not surprisingly, there is a significant difference between the percent of married-couple families with their own children in the City (21.87%) than the County (32.04%). The presence of

children is a protected class so information and education on this issue may be needed more in the City than in the County.

c. Age Distribution

Lancaster County has 6.5% of its residents under the age of 5; 23.5 of its population is under the age of 18. Residents over the age of 65 comprised 17.9% of the population. These percentages are comparable to the state and nation.

The total percent by category shown below is similar to the percentages shown in the 2010 Census.

Table 4. Lancaster County Residents by Age

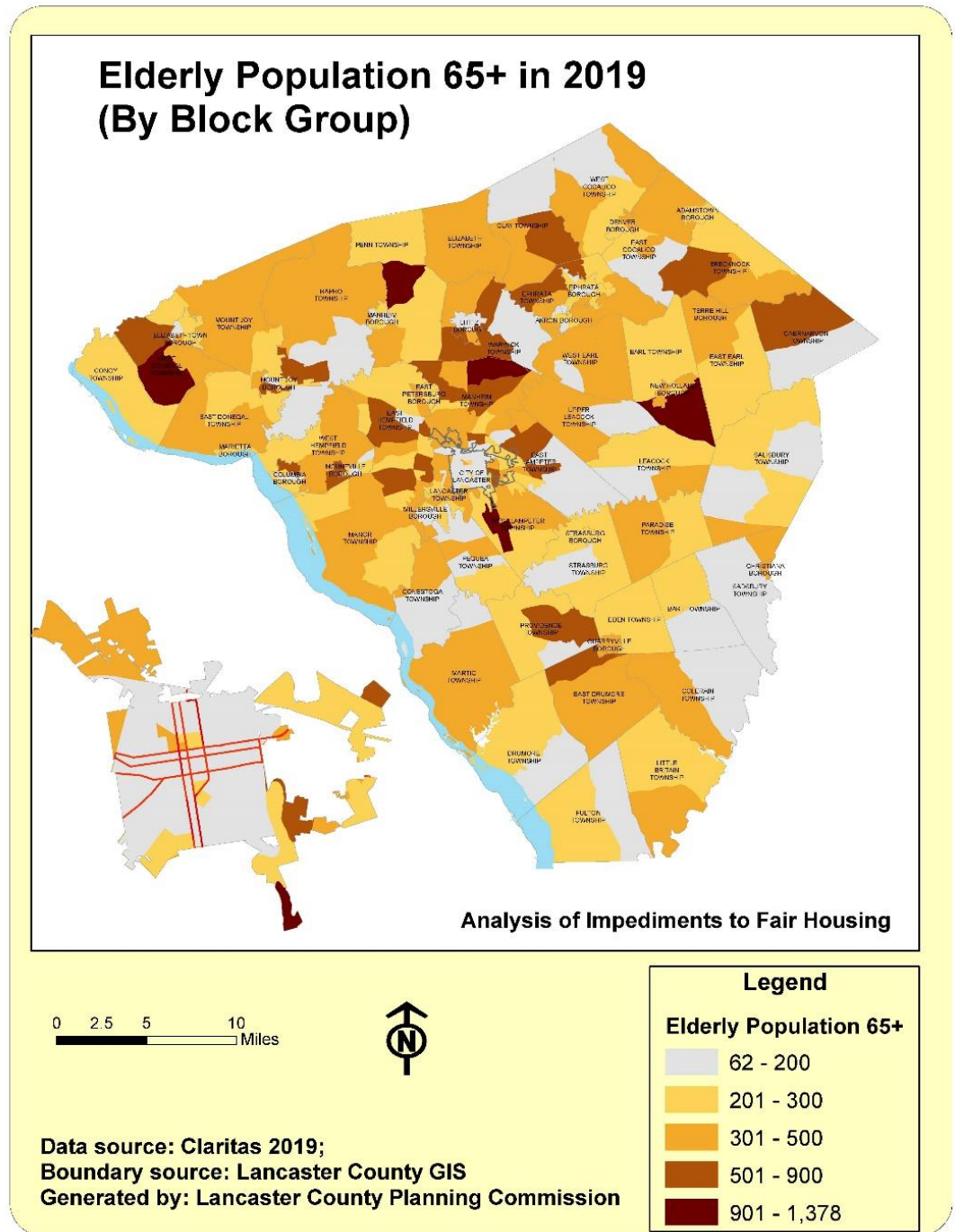
Category	Age	Number	Percent	Total Percent
Children	Under 5 years	35,700	6.7%	6.7%
School Age	5-9 years	36,933	6.9%	20%
	10-14 years	34,301	6.4%	
	15-19 years	36,468	6.8%	
Young Adult	20-24 years	35,344	6.6%	31%
	25-29 years	35,732	6.7%	
	30-34 years	32,731	6.7%	
	35-39 years	30,462	6.1%	
	40-49 years	30,496	5.7%	
Middle Age	45-49 years	32,806	6.1%	26%
	50-54 years	36,622	6.8%	
	55-59 years	36,266	6.8%	
	60-64 years	32,800	6.1%	
Elderly	65-69 years	27,769	5.2%	15%
	70-74 years	19,911	3.7%	
	75-79 years	15,640	2.9%	
	80-84 years	1,242	2.3%	
	85+ years	14,271	2.7%	
Total		536,494		

Source: 2013-2017 ACS 5-Year Estimates

Claritas estimates that the 2019 median age for Lancaster County was 38.67 versus the City at 33.69 and the 2019 estimated average age for the County was 39.80 versus the City at 35.60. clearly the City residents are generally younger overall. Claritas projects that by 2024 the median age for the City will be 35.3 and the median age for the County will be 38.98 both showing an increasingly aging population.

The map below may be deceiving as the concentrations are generally due to retirement communities such as Masonic Village and Willow Valley.

Figure 6. Concentration of the Elderly Population



Interpretation 3: An increase in the older population raises the potential of age discrimination in housing which is a protected class. Fair housing education may need to be targeted to this issue to prevent housing discrimination. A high number of older residents impacts the housing needs related to affordability, accessibility, and the need for health services.

d. Religion

The Association of Religion Data Archives shows that as of 2010, the ten largest Religious Bodies in Lancaster County by Number of Adherents were as follows:

Table 5. Religious Bodies in Lancaster County by Number of Adherents

Religious Body	Adherents
Catholic Church	51,292
Non-denominational	43,103
United Methodist	28,676
Amish	26,270
Lutheran	22,429
Mennonite	15,225
Church of the Brethren	8,968

Source: Association of Religion Data Archives, County Membership Report, 2010

The County has a large number of Anabaptist groups which include Amish, Mennonite, and Brethren due to its historical roots as a center of immigration in the late 1700's from areas now known as Germany.

When it comes to discrimination in the rental housing market, it should be noted that the religion of the landlord is often a determinant in situations of discrimination. Some landlords feel that renting to an unmarried couple, an unmarried mother with children or two unmarried individuals in a relationship, etc. is against their religion. Information should continue to be provided to landlords to make it clearly understood that these forms of discrimination are illegal.

Interpretation 4: Religion is a protected class for fair housing. Knowing the predominant types of religions helps to target fair housing education efforts.

e. National Origin and Linguistic Isolation

Housing cannot be refused based on a person's birthplace, ancestry, nor can housing providers refuse to access to persons based on their inability to read, write, speak or understand English. Residents with Limited English Proficiency (LEP) can face obstacles in finding housing which is why recipients of federal funds must ensure that LEP citizen are provided access to housing.

According to the 2013-2017 ACS Estimates, Lancaster County has 26,202 residents or 4.8% of the population that are foreign born. Of the 26,202; 55% are naturalized citizens.

Lancaster County has a lower percent of foreign-born persons from 2013-2017 (4.8%) than Pennsylvania (6.6%) or the United States (13.4%).

Table 6. Limited English-Speaking Households

Languages	Households	Limited English-Speaking Households
Spanish	15,443	3,086
Other Indo-European Languages	12,892	2,116
Asian and Pacific Island Languages	2,675	749
Other Languages	1,241	265
Total Households	198,565	6,216

Source: 2013-2017 American Community Survey 5-Year Estimates (S1602)

Claritas estimates that in 2019 the estimated population over age 5 speak mostly English in the home (83.98% in the County and 63.89% in the City). However, a significant difference is shown in the percent of residents that speak Spanish at home; 29.74% of City residents speak Spanish at home while 6.77% of County residents speak Spanish at home. In fact, the estimates show that more people living in the County speak IndoEuropean Languages at home than Spanish (7.03% versus 6.77% respectively).

Lancaster County has a significantly higher percent of residents that speak a language other than English at home at 16.7% compared to Pennsylvania but lower than the percent of similar persons in the United States (21.3%).

In Lancaster County, the largest percentage of people show an ancestry from Germany, likely a result of the “Pennsylvania Dutch” influence. In the City of Lancaster, the largest percentage of people show an ancestry from Other ancestries or unclassified ancestry. German ancestry in the City is 12.43% compared to 27% in the County.

There are several nonprofit and faith-based organizations that work with refugees from many different countries to help in their resettlement in Lancaster County and City.

The Lancaster Chamber recently released a report entitled *Strengthening the Workforce by Welcoming Immigrant Contributions: Facts and Strategies*. This document discussed the efforts in the county will the refugee population. Another source of information on refugees in the County is <https://www.dhs.pa.gov/refugeesinpa/Pages/Facts.aspx>

Interpretation 5: Significantly more City residents speak Spanish at home than the County as a whole (29% versus 6.7%). This shows a need for fair housing education targeted in several languages, most importantly in Spanish.

f. Race and Ethnicity

According to QuickFacts from the Census.gov, Lancaster County is predominantly White residents(89.8%) which is slightly higher than the state (81.8%) but significantly higher than the nation (76.5%). Claritas estimates that in 2019 Lancaster County’s population of White residents is 85.94% with the population of Black residents estimated to be 4.29%. Other races and multiple races are all estimated to be less than 5%.

Lancaster County has a significantly lower percent of residents that are Black or African American than the State or nation. (Lancaster County 5.2%; Pennsylvania 12%; United States 13.4%)

Lancaster County has a higher percent of Hispanic residents than the State (10.8% versus 7.6%) but less than the nation (18.3%). Claritas estimates that in 2019, 10.93% of the County population is Hispanic. Claritas estimates that in 2019 Hispanic residents comprise 45.21% of the City’s population.

The racial breakdown in Lancaster County is proportionally similar to the breakdown indicated in the 2010 Census.

Table 7. Racial Breakdown in Lancaster County

Race	Persons	Percent
White	475,145	89%
Black or African American	22,900	4%
American Indian and Alaskan Native	826	<1%
Asian	11,493	2%
Native Hawaiian and Other Pacific Islander	53	<1%
Some Other Race	15,070	3%
Two or More Races	11,007	2%
Total	536,494	

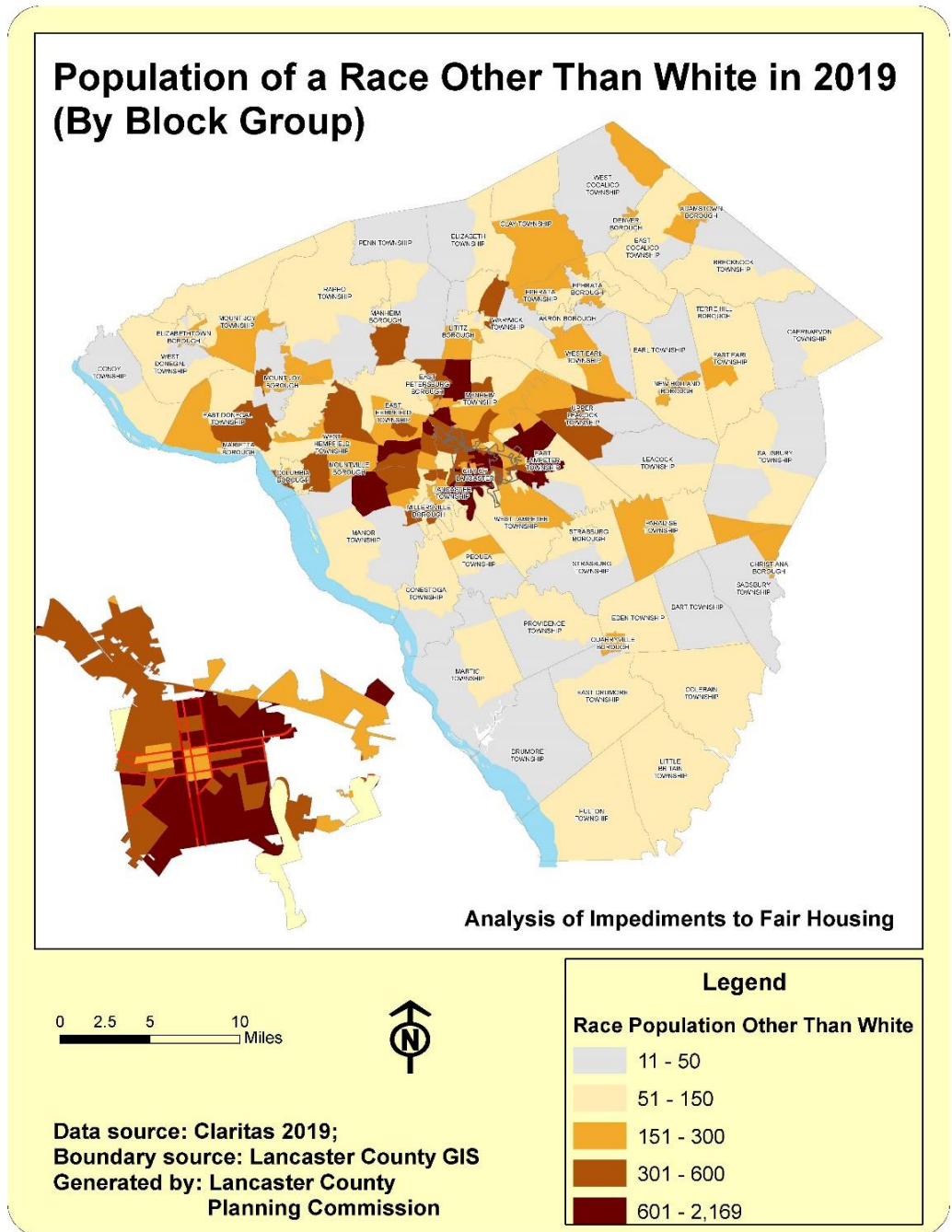
Table 8. Racial Breakdown in the City of Lancaster

Race	Persons	Percent
White	35,694	60%
Black or African American	10,440	18%
American Indian and Alaskan Native	129	<1%
Asian	2,369	4%
Native Hawaiian and Other Pacific Islander	0	0%
Some Other Race	8,169	14%
Two or More Races	2,755	5%
Total	59,556	

Claritas estimates that the highest percent of Asian residents in originate from Vietnam in both the City and County.

Of the estimated 536,494 persons residing in Lancaster County 53,792 or 10% are Hispanic or Latino residents. Of the 59,556 persons living in the City of Lancaster 23,036 or 38% are Hispanic or Latino residents. In both the County and the City, the majority of Hispanic residents originate from Puerto Rico (66.81% and 74.06% respectively). The majority of Hispanic residents in both the County and the City identify their race as with White Alone or Some Other Race.

Figure 7. Population of a Race Other Than White in 2019



Minority Concentrations

HUD defines areas of racial or ethnic concentration as geographic areas where the percentage of a specific minority or ethnic group is *10 percentage points higher* than a jurisdiction's overall percentage.

Lancaster City was the only municipality that showed a minority concentration for Blacks or African Americans. However, if broken down by Census Tracts, there are several more areas of minority concentration.

There are a handful of census tracts that show a minority concentration:

- The following Census tracts showed proportions greater than 10 percentage points higher than the County proportion for Blacks or African Americans: **1, 2, 3, 7, 8, 9, 10, 11, 12, 112**. Most of these tracts (identified in bold) are in the City of Lancaster.
- Census Tract 118.05 showed a disproportionately high percent of persons identifying themselves as two or more races (12%).
- Census Tract 135.01 showed a higher than the County proportion for "Some Other Race."
- Census tract 147 shows a concentration of 10 percent points higher than the County proportion at 31% of the tract comprised of Black or African Americans. This tract also shows a disproportionately high percent of persons described as "Some Other Race" at 18%.

There is little change in the figures by municipality since the data was collected in 2010.

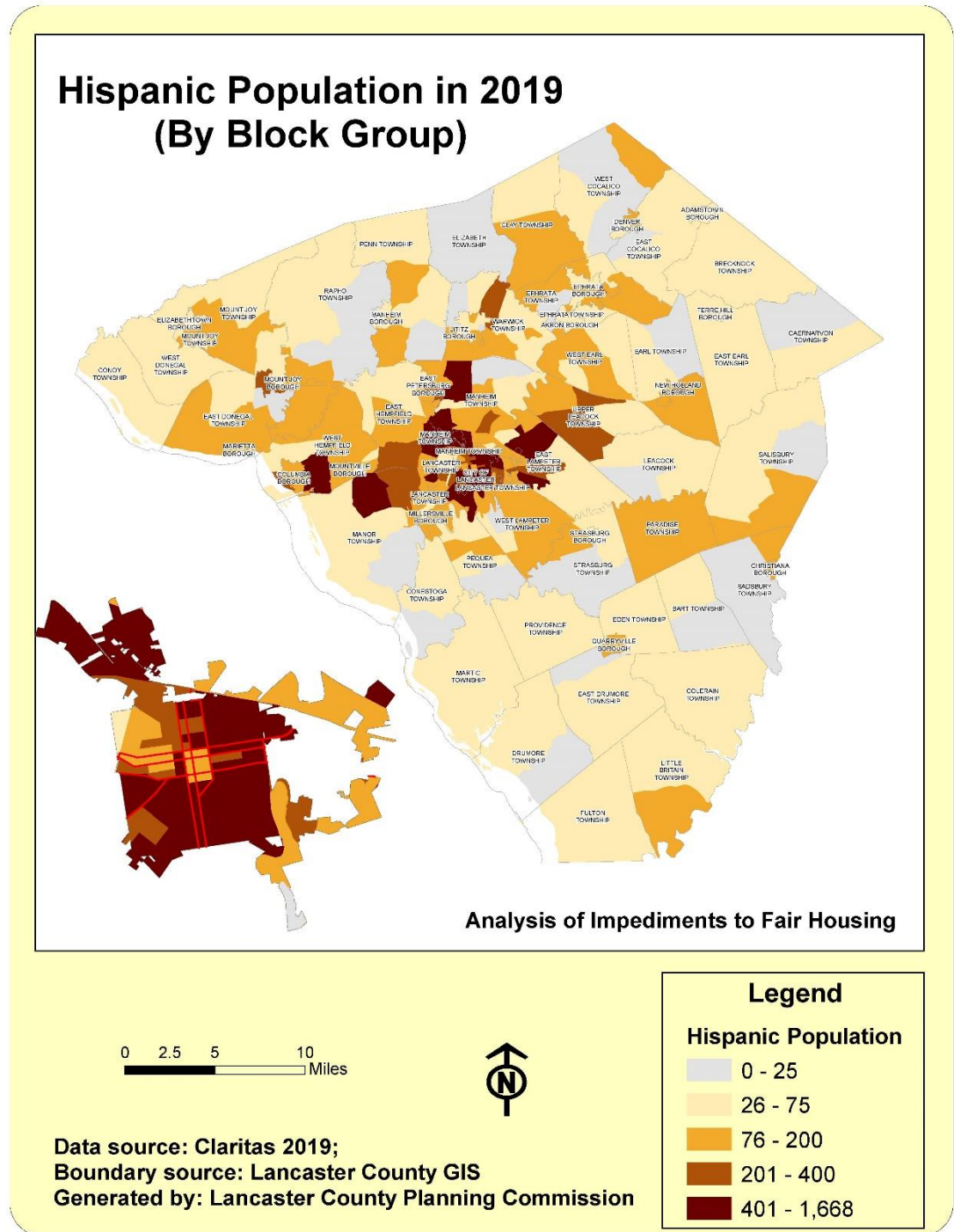
Interpretation 6: The City of Lancaster has a higher concentration of census tracts with minority concentrations. This shows a need for fair housing education in the City of Lancaster to ensure that people of color reside predominantly in the City by choice and not by systematic segregation.

Ethnicity

Hispanics/Latinos represent 11% of the population in Lancaster County. The following census tracts exceed that percent by more than 10%:

- All Census Tracts in the city of Lancaster (1, 2, 3, 6,7,8,9,11,11,12,14, 118.05 and 147)
- 134
- 135.01
- 141.01

Figure 8. Hispanic Population in 2019 in Lancaster County By Block Group



Interpretation 7: The majority of Hispanics in Lancaster County are concentrated in the City of Lancaster. This shows a need for fair housing education in the County to ensure that Hispanics reside predominantly in the City by choice and not by systematic segregation.

g. Persons with Disabilities

Persons with disabilities are protected by six (6) standards of accessibility:

- The Fair Housing Act- refers to accessibility in buildings built after March 31, 1991 and includes four or more units.
- Americans with Disabilities Act (ADA) – refers to ADA standards of accessibility in places of public accommodation and commercial facilities.
- Uniform Federal Accessibility Standards – refers to accessibility standards for facility accessibility by people with motor and sensory disabilities for Federal and federally funded facilities.
- Section 504 (see below)
- Visitability Standards – refers to housing designed so that it can be lived in or visited by people with disabilities.
- Universal Design – refers to the design of products and environments to be useable by all people, to the greatest extent possible, without adaptation or specialized design.

Section 504 of the Rehabilitation Act is a national law that protects qualified individuals from discrimination based on their disability. The nondiscrimination requirements of the law apply to employers and organizations that receive any federal financial assistance. Section 504 forbids organizations and employers from excluding or denying individuals with disabilities an equal opportunity to receive program benefits and services. Individuals with disabilities have the right to participate in, and have access to, program benefits and services.

Under Section 504, individuals with disabilities are defined as a person with a physical or mental impairment which substantially limits one or more major life activities. People who have a history of or are regarded as having a physical or mental impairment that substantially limits one or more major life activities are also covered. Major life activities include care for one's self, walking, seeing, hearing, speaking, breathing, working, performing manual tasks, and learning. Some examples of impairments which may substantially limit major life activities, even with the help of medication or aids/devices are: AIDS, alcoholism, blindness or visual impairment, cancer, deafness or hearing impairment, diabetes, drug addiction, heart disease, and mental illness.

The Americans with Disabilities Act gives civil rights protections to individuals with disabilities like those provided to individuals based on race, color, gender, national origin, age, and religion. It guarantees equal opportunity for individuals with disabilities in public accommodations, employment, transportation, State and local government services, and telecommunications.

In addition to accessibility guidelines, the Fair Housing Act also ensures that people with disabilities have the right to request the reasonable modifications to their dwellings that are needed to fully use and enjoy their housing. These modifications can create viable housing options that would be otherwise inaccessible for persons with disabilities.

According to Census.gov QuickFacts, 8.0 % of Lancaster County residents under the age of 65 have a disability, which is similar to the United States but lower than Pennsylvania (9.6%).

According to www.disabilitystatistics.org, the 2017 ACS shows that in Pennsylvania, the overall percent of people with a disability of all ages was 14.2% and that persons with disabilities ages 21-64 are estimated to have an annual household income of \$44,900 in Pennsylvania. The same source estimates that people with disabilities in Pennsylvania have a poverty rate of 28%. The 2017 ACS also estimates that the employment rate for persons with disabilities in Pennsylvania was 37.1%.

In Lancaster County, Pennsylvania, among the civilian noninstitutionalized population in 2013-2017, 11.7% reported a disability according to the ACS. The likelihood of having a disability varied by age - from 4.4% of people under 18 years old, to 9.5% of people 18 to 64 years old, and to 31.1% of those 65 and over.

Table 9. Disability Type by Age in Lancaster County

Disability Type	Age	With a disability	Percent
Hearing disability		20,655	3.8%
	Under 18	886	.7%
	18-64	5,649	1.8%
	65+	14,120	15.6%
Vision		10,524	2%
	Under 18	397	.3%
	18-64	4,683	1.5%
	65+	5,444	6%
Cognitive		23,308	4.7%
	Under 18	4,224	4.6%
	18-64	13,144	4.1%
	65+	5,940	6.6%
Ambulatory		28,934	5.8%
	Under 18	542	.6%
	18-64	12,382	3.9%
	65+	16,010	17.7%
Self-care difficulty		9,536	1.9%
	Under 18	931	1%
	18-64	4,672	1.5%
	65+	3,933	4.4%
Independent living difficulty		20,771	5.1%
	18-64	11,005	3.5%
	65+	9,766	10.8%

Source: 2017 ACS 1-Year Estimates

Interpretation 8: People with disabilities are a protected class under fair housing laws. Most fair housing complaints are filed by people with disabilities which can be viewed as a positive situation. It may show that people with disabilities are aware of their rights and are willing to file complaints when those rights have been violated. However, relying on the number of complaints as a sign of the degree of discrimination may not be accurate. It may be a situation that can be resolved by increased education toward landlords to help them understand issues such as reasonable accommodation. Focus on education efforts concerning fair housing and person with disabilities should continue.

h. Income

The median household income in 2017 dollars 2013-2017 for Lancaster County was \$61,492 which is higher than the Pennsylvania median household income of \$56,951 and the United States at \$57,652. However, the per capita income in the past 12 months (in 2017 dollars) for 2013-2017 was \$29,280 for Lancaster County which is lower than the Pennsylvania per capita income for the same period (\$31,476) and the United States (\$31,177).

According to the 2013-2017 ACS 5-Year Estimates, the municipalities with the three (3) lowest median household incomes are:

- Lancaster City (\$40,805)
- Columbia Borough (\$40,982)
- Manheim Borough (\$49,871)

According to the same source, the municipalities with the three highest median household incomes are:

- Elizabeth Township (\$80,966)
- Sadsbury Township (\$77,321)
- Adamstown Borough (\$76,759)

The Lancaster County Profile from the PA Center for Workforce & Analysis lists Lancaster County's Per Capita Personal Income as \$49,207 compared to PA's Per Capita Person Income of \$53,300.

Table 10. Median Family Income by Race for Lancaster County and City of Lancaster

Race	Lancaster County	Lancaster City
All Races	\$68,937	\$35,313
White	\$71,484	\$38,491
Black	\$38,399	\$29,557
Asian	\$70,479	\$40,697
Two or More	\$42,287	\$27,500

Source: 2011-2015 ACS Selected Economic Characteristics (DP03)

According to Claritas, the 2019 Estimated Average Household Income for county residents was \$85,434 and for the City was \$55,444. Also, according to Claritas, the 2019 Estimated Median Household Income for county residents was \$66,927 and for the City was \$42,154.

Table 11. Estimated 2019 Median Household Income by Single Classification Race

Race	Lancaster County	Lancaster City
White Alone	\$69,851	\$49,168
Black Alone	\$40,725	\$35,702
American Indian and Alaskan Native Alone	\$54,669	\$48,448
Asian Alone	\$77,235	\$58,564
Other Race Alone	\$36,119	\$29,157
Two or More Races	\$54,666	\$41,843
Hispanics of Any Race	\$40,648	\$31,896

Source: Claritas

Table 12. Percent Change in Median Family Income by Race since 2006-2010 ACS 5-Year Estimates

Race	Lancaster County	Lancaster City
All Races	7%	-6%
White	8%	-4%
Black	-5%	-17%
Asian	10%	-21%
Two or more	20%	67%

The Median Family Income for Hispanics/Latinos of any race in Lancaster County is \$32,206. Claritas projects that in 2024 the Median household income for City residents will be \$46,247 compared to the estimated amount in 2019 of \$42,154. Claritas projects that in 2024 the Median household income for County residents will be \$73,439 compared to the estimated amount in 2019 of \$66,927.

Table 13. 2019 Income Limits for Lancaster County Metropolitan Statistical Area Used for Programs Funded through the US Department of Housing and Urban Development

Number of Persons in Family	Very Low Income (30% of MFI)	Low Income (50% of MFI)	Moderate Income (80% of MFI)
1	\$16,000	\$26,700	\$42,700
2	\$18,300	\$30,500	\$48,800
3	\$20,600	\$34,300	\$54,900
4	\$22,850	\$38,100	\$60,950
5	\$24,700	\$41,150	\$65,850
6	\$26,550	\$44,200	\$70,750
7	\$28,350	\$47,250	\$75,600
8	\$30,200	\$50,300	\$80,500

To calculate the income limits for families with more than 8 members, 8% of the four-person base should be added to the eight-person income limit. For example, the nine-person limit equals 140 percent (132+8) of the relevant four-person income limit. All income limits are rounded to the nearest \$50.

Source: US Dept. of Housing and Urban Development

Interpretation 9: Members of protected classes tend to have lower incomes which affect their ability to have fair housing choices. While having a low income is not automatically an impediment to fair housing choice there is a clear connection.

Lancaster County has a lower percent of persons living in poverty (9.9%) than Pennsylvania (12.5%) or the United States (12.3%).

Claritas estimates that in 2019 7.01% of families live below the federal poverty line while 22.26% of City families live below the poverty line. Even more compelling is that only 5.24% of County families with children live below the poverty line while 19.01% of City families with children live below the poverty line.

According to the 2013-2017 ACS 5-Year Estimates, the census tracts with the highest population of persons living below poverty level are:

- 1, 2, 3, 5, 7, 8, 9, 10, 11, 14 and 147 (all located within the city of Lancaster)
- 112
- 114
- 136.02

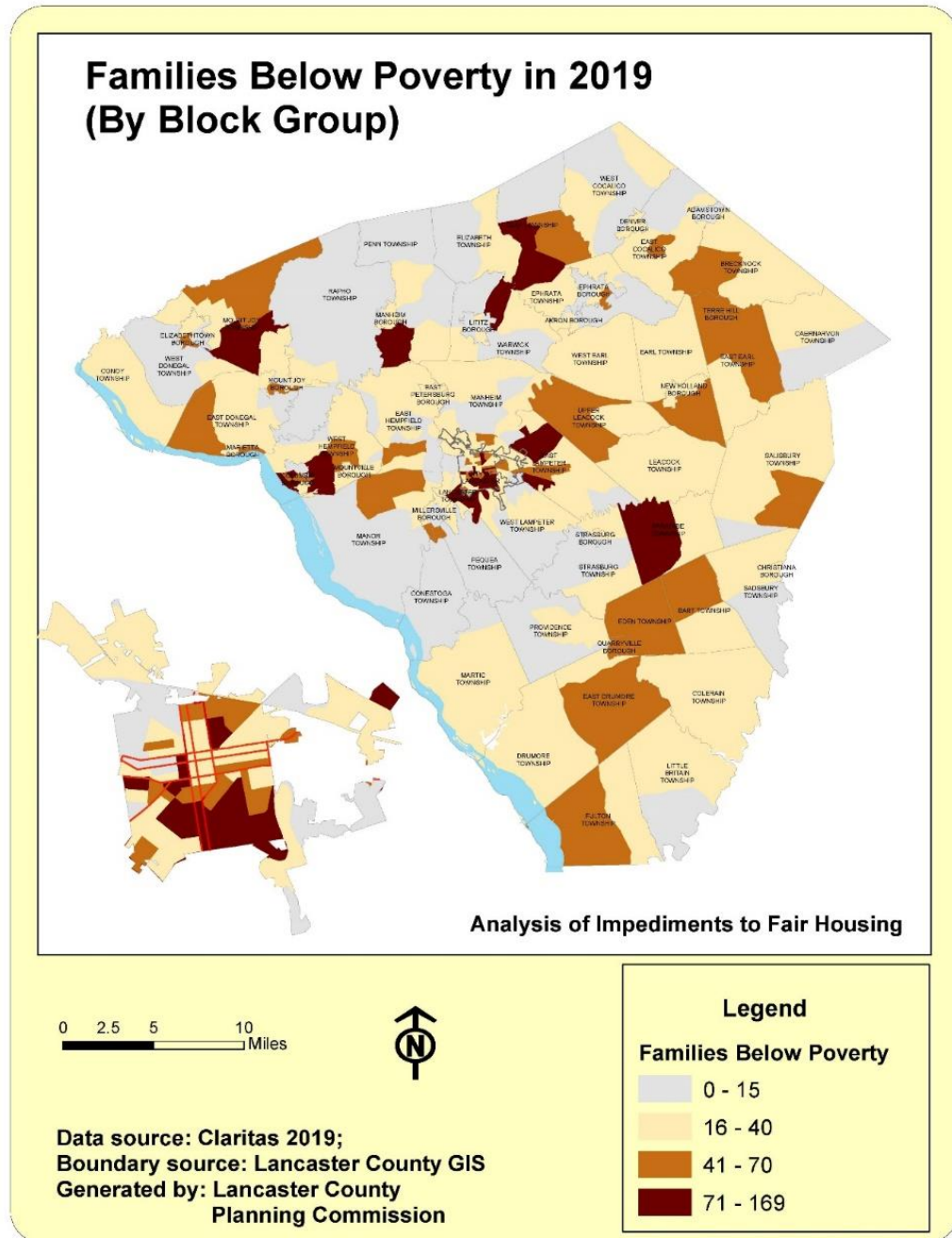
According to the same sources, the municipalities with the highest percent of persons living below the poverty level are:

- Lancaster City (26%)
- Columbia Borough (20%)
- Millersville Borough (20%)

Other municipalities that have a higher percent of persons living below the poverty line than the county as a whole (10%) are:

- Colerain Township 11%
- Conoy Township 16%
- Earl Township 11%
- East Lampeter Township 12%
- Eden Township 13%
- Ephrata Borough 11%
- Fulton Township 11%
- Lancaster Township 13%
- Manheim Borough 11%
- Marietta Borough 16%
- Mount Joy Township 11%
- Mountville Borough 18%
- Paradise Township 17%
- Providence Township 14%
- Upper Leacock Township 14%
- West Earl Township 12%

Figure 9. Families Below Poverty Level in 2019



The National School Lunch Program (NSLP) is a federally assisted meal program operating in public and nonprofit private schools and residential childcare institutions. It provides nutritionally balanced, low-cost or free lunches to children each school day. Children from families that are 185% of Poverty Guidelines are eligible for the Reduced School Lunch Program while children from families that are 130% of Poverty Guidelines are eligible for the free lunch program.

Table 14 below shows the percentage of students eligible for the Free/Reduced School Lunch Program in Lancaster County School Districts. Like the population in poverty, the highest percent for the program was in the City of Lancaster/Lancaster Township and Columbia.

Table 14. 2018 Free and Reduced Cost Lunch Programs in Lancaster County by School District

School District	Total Enrollment	Eligible for Free lunch	Eligible for Reduced	Free/Reduced Enrollment
Cocalico	3,072	867	193	34%
Columbia Borough	1,397	1,383	0	99%
Conestoga Valley	4,912	1,510	261	36%
Donegal	2,908	983	142	38%
Eastern Lanc. Co	3,105	1,014	182	38%
Elizabethtown Area	3,571	852	135	27%
Ephrata Area	4,173	1,500	248	42%
Hempfield	7,000	2,194	326	36%
Lampeter Strasburg	3,066	617	92	23%
Lancaster	11,102	11,102	0	100%
Manheim Central	2,127	636	128	36%
Manheim Township	6,168	1,699	263	32%
Penn Manor	5,438	2,051	304	43%
Pequea Valley	1,515	685	92	51%
Solanco	3,052	1,282	174	47%
Warwick	4,001	1,118	148	32%
Total	66,607	29,493	2,688	48.3

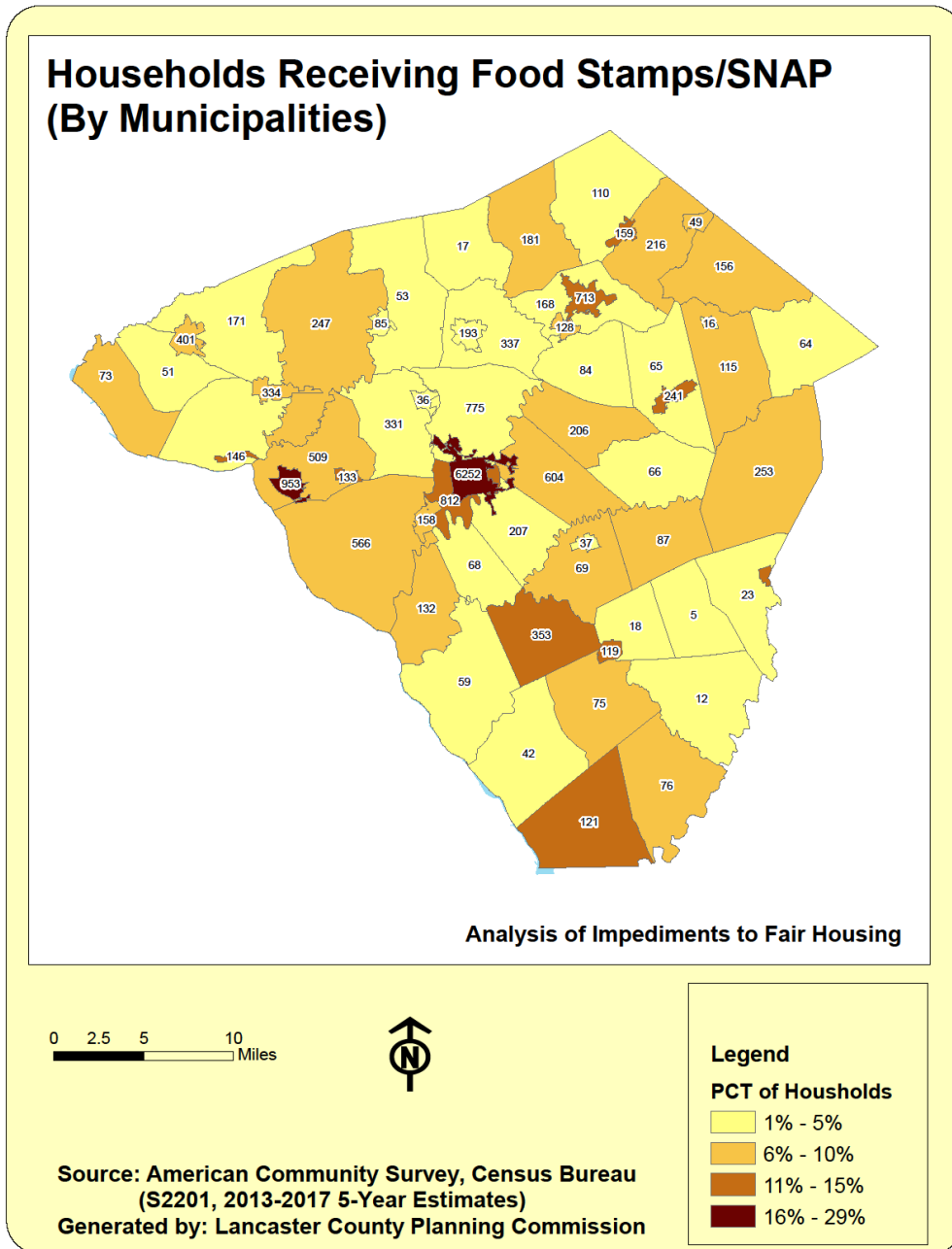
Source: National School Lunch Program Reports, U.S. Department of Education

The 2013-2017 ACS 5-Year Estimates provides information on the number of households in each municipality that received Food Stamps/SNAP Benefits. The percent of County Households receiving SNAP benefits was 9%. The following municipalities indicated percentages higher than 11%:

- Columbia Borough 22%
- Ephrata Borough 12%
- Fulton Township 13%
- Lancaster City 29%
- Lancaster Township 12%
- Marietta Borough 13%
- Providence Township 12%
- Quarryville Borough 12%

Interpretation 10: Poverty restricts housing choice. Families and children living in poverty may hesitate to assert their housing rights for fear of retaliation by the landlord. With vacancy rates so low and the supply of affordable housing scarce, poor households are often caught in a vicious cycle of lacking the financial means to move and feeling that they have no choice but to remain in unsafe housing.

Figure 10. Households Receiving Food Stamps/SNAP Benefits by Municipality



i. Employment Data

Lancaster County generally has one of the lowest unemployment rates in the State due to its diverse economic base.

Occupations and industries in the County

There are five (5) categories of Occupation according to the 2013-2017 ACS 5-Year Estimates:

- Management, Business, Science and Arts
- Service
- Sales and Office
- Natural Resources, Construction, Maintenance
- Production, Transportation, Material Moving

The highest percent of occupations in Lancaster County are in Management, Business, Science and Arts (33%) followed by Sales and Office (23%). East Hempfield Township has the highest percent of persons working in Management, Business, Science and Arts occupations (45%). Manheim Borough and Millersville Borough are tie for the highest percent of residents working in Service occupations. Clay Township and West Hempfield Township are tied for the highest percent of residents working in Sales and Office occupations. Bart Township has the highest percentage of persons working in Natural Resources, Construction and Maintenance (30%). Terre Hill Borough has the highest percentage of persons working in Production, Transportation, and Material Moving (29%).

Employed persons over the age of 16 in City of Lancaster comprise the following percentages of occupations:

- 26% Management, Business, Science and Arts
- 23% Service
- 21% Sales and Office
- 7% Natural Resources, Construction, Maintenance
- 23% Production, Transportation, Material Moving

Table 15. Companies with the Top Ten Largest Number of Employees

	Company Name
1.	LGH Penn Medicine
2.	Mutual Assistance Group
3.	Nordstrom Inc
4.	Dart Container Corporation
5.	County of Lancaster
6.	Lancaster School district
7.	Masonic Villages
8.	Giant Food Stores
9.	LSC Communications
10.	Federal Government

Source: Quarterly Census of Employment and Wages, Pennsylvania Department of Labor and Industry, Center for Workforce Information & Analysis

The unemployment rate in Lancaster County as of October 2019 was 3.5% which is slightly lower than the unemployment rate for PA at 4.2%.

The mission of the Lancaster County Workforce Investment Board (WIB) is to coordinate, develop, and maintain an effective and responsive system of programs and services that integrates the needs of employers for an ample and productive workforce with the needs of County residents for meaningful work that enhances their quality of life. The WIB oversees the PA CareerLink of Lancaster County, which is located at 1016 North Charlotte Street, Lancaster, PA. PA CareerLink is the connecting link between hundreds of County residents that come to the PA CareerLink weekly to search for jobs, upgrade their skills, and look for new careers and County businesses that want to hire them.

The 2018 High Priority Occupations for Lancaster County indicates that the occupations with the highest number of annual job openings are listed below.

Table 16. 2018 High Priority Occupations for Lancaster County

Occupations	Number of Annual Openings	Annual Average Salary
Nursing Assistants	171	\$30,740
Registered nurses	146	\$63,430
Heavy & Tractor-Trailer Truck Drivers	126	\$43,880
Customer Service Representatives	110	\$35,750
Licensed Practical & Licensed Vocational Nurses	105	\$45,330

Table 17. Wages for Specific Occupations in Lancaster County

Occupation	Median Hourly Wage	Mean Hourly Wage	Annual Mean Wage
Total All Occupations	\$ 17.49	\$ 21.61	\$ 44,960
Management	\$ 46.86	\$ 53.58	\$ 111,440
Business and Financial	\$ 29.67	\$ 33.17	\$ 69,000
Computer and Mathematical	\$ 32.14	\$ 34.78	\$ 72,350
Architecture and Engineering	\$ 34.42	\$ 36.57	\$ 76,060
Life, Physical and Social Science	\$ 23.18	\$ 26.69	\$ 55,520
Community and Social Service	\$ 19.56	\$ 21.25	\$ 44,200
Legal	\$ 24.54	\$ 29.56	\$ 61,490
Education, Training and Library	\$ 24.49	\$ 25.31	\$ 52,630
Art, Design, Entertainment, Sports, & Media	\$ 18.37	\$ 20.45	\$ 42,530
Healthcare Practitioners and Technical	\$ 31.72	\$ 38.93	\$ 80,980
Healthcare Support	\$ 15.00	\$ 16.37	\$ 34,040
Protective Service	\$ 18.89	\$ 22.52	\$ 46,840
Food Prep & Serving-related	\$ 10.59	\$ 11.45	\$ 23,810
Building and Grounds Cleaning and Maintenance	\$ 12.27	\$ 13.31	\$ 27,680
Personal Care and Service	\$ 11.56	\$ 12.60	\$ 26,200
Sales and Related	\$ 12.59	\$ 18.66	\$ 38,810
Office and Administrative Support	\$ 16.42	\$ 17.43	\$ 36,250
Farming Fishing and Forestry	\$ 13.61	\$ 14.40	\$ 29,960
Construction and Extraction	\$ 20.81	\$ 21.95	\$ 46,650
Installation, Maintenance and Repair	\$ 21.54	\$ 22.37	\$ 46,530
Production	\$ 18.11	\$ 19.09	\$ 39,710
Transportation and Material Moving	\$ 15.50	\$ 16.91	\$ 35,170

Source: Bureau of Labor Statistics, May 2018 Metropolitan and Nonmetropolitan Area Occupational Employment and Wage Estimates Lancaster PA MSA

Interpretation 11: Lancaster County has a diverse economic base which protects it from swings in the economy. However, as in other communities across the country, incomes are not keeping pace with the increase in housing costs. This disparity limits housing choice.

C. Housing Data

1. Tenure

There are 208,751 total housing units in Lancaster County according to the Census Bureau's 2013-2017 American Community Survey 5-Year Estimates. Of these housing units, 68.2% are owner-occupied which is similar to the PA percent of tenure.

Claritas estimates that in 2019, the percent of homeowners in the County is 68.45% and the percent of renters is 31.55. this contrasts with the percent of homeowners in the city (43.88%) and the percent of renters 56.12%).

According to the 2010 Census, Blacks had a rate of homeownership of 35% compared to Whites which was 71%. Persons who list their race as Other had a homeownership rate of 29% while persons of two or more races had a homeownership rate of 41%. Asians had a homeownership rate of 68%.

Table 18. Housing Tenure by Race/Ethnicity for Lancaster County and City

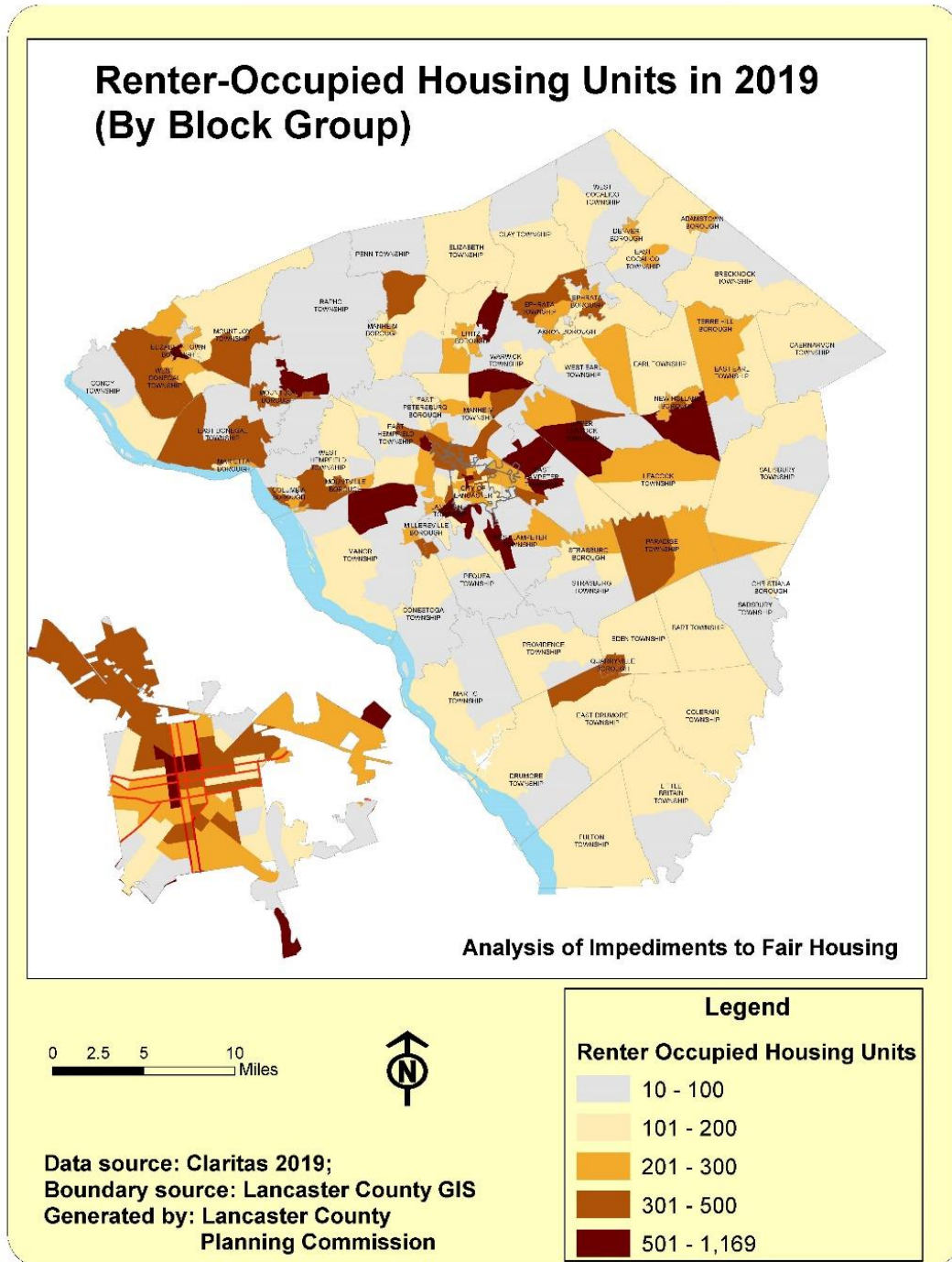
	Lancaster County				Lancaster City			
	Homeowners		Renters		Homeowners		Renters	
Race/Ethnicity	#	%	#	%	#	%	#	%
White Non-Hispanic	119,195	75%	40,224	25%	125,815	73%	45,140	27%
Black, non-Hispanic	935	33%	1,870	66%	1,720	31%	3,775	69%
Hispanic	2,559	41%	3,628	59%	4,410	33%	8,825	66%
Asian, Non-Hispanic	1,583	76%	484	24%	1,975	75%	675	25%
Native American, Non-Hispanic	79	42%	110	58%	90	41%	130	59%
Other, Non-Hispanic	786	65%	417	35%	830	55%	685	45%
Total Household Units	125,160	73%	46,769	27%	134,845	69%	59,235	31%

**Data presented are numbers of households not individuals*

Source: CHAS data

Interpretation 12: Homeownership rates by race and ethnicity vary greatly. While incomes by race and ethnicity are generally lower, it is disconcerting that access to financing for non-whites and Hispanics for homeownership may be an impediment.

Figure 11. Renter-Occupied Housing Units in 2019



2. Type of Housing

Table 19. Units in Structures in Lancaster County

Type of Housing Units	Estimate	Percent
Total Housing Units	208,751	
1 unit detached	114,939	55.1%
1-unit attached	42,764	20.5%
2 units	7,303	3.5%
3-4 units	9,651	4.6%
5-9 units	9,165	4.4%
10-19 units	6,189	3.0%
20 or more units	10,601	5.1%
Mobile home	8,084	3.9%
Boat, RV, van, etc.	55	<1%

Source: 2013-2017 ACS 5-Year Estimates

Interpretation 13: The housing stock in Lancaster County is predominantly 1 unit detached. Multi-family housing often represents an affordable housing option for households with lower incomes, which means that its concentration in limited geographic areas such as the city of Lancaster and boroughs is potentially problematic from a housing choice perspective. More variety in the cost of housing throughout the County helps to avoid housing impediments.

3. Age of Housing

As shown in the table below, the housing stock in Lancaster County is old with 43% of housing units built prior to 1969. Over 117,731 housing units were built before 1980 indicates a high likelihood that they contain lead-based paint.

Table 20. Year Housing Units were Built in Lancaster County

Years Housing Units Built	Estimate	Percent
Total Housing Units	208,751	
Built 2014 or later	1,712	.8%
Built 2010 to 2013	5,300	2.5%
Built 2000 to 2009	24,595	11.8%
Built 1990 to 1999	29,715	14.2%
Built 1980 to 1898	29,698	14.2%
Built 1970 to 1979	25,548	12.2%
Built 1960 to 1969	17,931	8.6%
Built 1950 to 1959	19,642	9.4%
Built 1940 to 1949	8,890	4.3%
1939 or earlier	45,720	21.9

Source: 2013-2017 ACS 5-Year Estimates

The majority of housing units in Lancaster County are heated by electricity, utility gas and fuel oil.

Interpretation 14: An old housing stock raises concerns about proper maintenance and the need to address lead-based paint hazards. Because old houses are more likely to have lead hazards and because lower income households are more likely to live in older housing, there is a high concern about lead based paint hazards, especially in young children. While it is required for landlords to disclose the possibility of lead-based paint hazards to tenants, not all landlords are compliant. Poor households may be constrained in their ability to find and afford rental housing that does not have lead hazards.

4. Cost Burden

The 2013-2017 ACS 5-Year Estimates indicates that 40.9% of Lancaster County residents pay more than 35% of their income on housing costs.

Table 21. Demographics of Households with Severe Housing Cost Burden

Households with Severe Housing Cost Burden	Lancaster County			Lancaster City		
	# with severe cost burden	# Households	% with severe cost burden	# with severe cost burden	# Households	% with severe cost burden
Race/Ethnicity						
White Non-Hispanic	18,332	159,376	11.5%	20,035	170,960	11.7%
Black, non-Hispanic	540	2,791	19.3%	1,420	5,474	25.9%
Hispanic	1,283	6,152	20.9%	3,365	132,45	25.4%
Asian, Non-Hispanic	141	2,055	6.9%	205	2,649	7.7%
Native American, Non-Hispanic	120	188	63.8%	115	224	51.3%
Other, Non-Hispanic	230	1,200	19.2%	350	1,518	23.1%
Total	20,646	171,929	12%	25,490	194,080	13.1%
Household Type and Size						
Family Households, <5 people	8764	106528	8.23	10920	116530	9.37
Family Households, 5+ people	1718	17992	9.55	2209	20254	10.91
Non-family households	10094	47353	21.3	12355	57295	21.56

Note 1: Severe housing cost burden is defined as greater than 50% of income

Note 2: All % represent a share of the total population within the jurisdiction, except household type and size which is out of total households

Note 3: The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.

Source: CHAS

The 2013-2017 ACS 5-Year Estimates show that 19.2% of homeowners in Lancaster County that pay 35% or more on housing costs; however, 40.9% of renters pay 35% or more on housing costs. According to the same source, the median rent paid in Lancaster County was \$957.

In Lancaster County, 26,221 households or 13% are estimated to have a Severe Cost Burden (paying more than 50% of their income on housing) according to the 2013-2017 ACS 5-Year Estimates. The 2011-2015 ACS shows 26,175 households with a severe housing cost burden. For renters, the majority (52%) of households with a severe housing cost burden earn less than 30% area median family income for the area. For homeowners, 39% of households with a severe housing cost burden earn less than 30% area median family income.

The 2011-2015 ACS shows 32,555 homeowner households with at least 1 of 4 housing problems (incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room and cost burden greater than 30%) and 30,090 renter households with at least one of 4 housing problems. The same data source also shows that 12,940 homeowner households that experience a severe housing problem with at least 1 of 4 severe housing problems; while 17,580 renter households experience a severe housing problem with at least 1 of 4 severe housing problems.

Interpretation 15: The higher incidence of cost burden among Blacks and Hispanics is indicative of a potential fair housing problem. A severe housing cost burden often means that households are stuck in housing that may not be safe nor is their stability in that unit. People with severe housing cost burden are at higher risk of eviction. The higher percent of severe housing cost burden in the City is worrisome as well.

Table 22. Demographics of Households with Disproportionate Housing Needs in Lancaster County

Disproportionate Housing Needs	Lancaster County		
Race/Ethnicity	# with Problems	# Households	% with Problems
White Non-Hispanic	47,970	159,376	30.10%
Black, non-Hispanic	1,305	2,791	46.76%
Hispanic	2,963	6,152	48.16%
Asian, Non-Hispanic	752	2,055	36.59%
Native American, Non-Hispanic	135	188	71.81%
Other, Non-Hispanic	499	1,200	41.58%
Total	53,649	171,929	31.20%
Family Households, <5 people	25,757	106,528	24.18%
Family Households, 5+ people	6,814	17,992	37.87%
Non-family households	21,061	47,353	44.48%
Households Experiencing Any of 4 Severe Housing Problems			
	# with severe Problems	# Households	% with severe Problems
White Non-Hispanic	21,341	159,376	13.39%
Black, non-Hispanic	588	2,791	21.07%
Hispanic	1,468	6,152	23.86%
Asian, Non-Hispanic	334	2,055	16.25%
Native American, Non-Hispanic	120	188	63.83%
Other, Non-Hispanic	295	1,200	24.58%
Total	24,099	171,929	14.02%

Table 23. Demographics of Households with Disproportionate Housing Needs in Lancaster City

Disproportionate Housing Needs	Lancaster City		
Race/Ethnicity	# with Problems	# Households	% with Problems
White Non-Hispanic	51,760	170,960	30.28%
Black, non-Hispanic	2,910	5,474	53.16%
Hispanic	7,080	13,245	53.45%
Asian, Non-Hispanic	1,010	2,649	38.13%
Native American, Non-Hispanic	155	224	69.20%
Other, Non-Hispanic	715	1,518	47.10%
Total	63,615	194,080	32.78%
Household Type and Size			
Family Households, <5 people	30,075	116530	25.81%
Family Households, 5+ people	7,930	20254	39.15%
Non-family households	25,615	57295	44.71%
Households Experiencing Any of 4 Severe Housing Problems.			
	# with severe Problems	# Households	% with severe Problems
White Non-Hispanic	23,200	170,960	13.57%
Black, non-Hispanic	1,525	5,474	27.86%
Hispanic	3,875	13,245	29.26%
Asian, Non-Hispanic	435	2,649	16.42%
Native American, Non-Hispanic	120	224	53.57%
Other, Non-Hispanic	420	1,518	27.67%
Total	29,560	194,080	15.23%

Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and the cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and the cost burden greater than 50%.

Note 2: All % represent a share of the total population within the jurisdiction, except household type and size which is out of total households.

Source: CHAS

5. Cost of Housing

A lack of affordable housing puts constraints on housing choice. Residents may be limited to fewer neighborhoods because of a lack of affordable housing elsewhere. There is a limited inventory of housing at lower price ranges.

The 2013-2017 ACS 5-Year estimates show that there were 1,684 Vacant-for-sale-only and sold, not occupied housing units at the time of data collection. Most homes available for data at the time of data collection were above \$125,000.

The 2013-2017 ACS 5-Year Estimates indicates that the mean value of owner-occupied housing units is \$193,000. The same data source indicates that the median gross rent was \$957.

Claritas estimates that in 2019 the median value of all owner-occupied housing units in the County was \$217,228 and the median value in the City was \$123,485.

The Lancaster County Association of Realtors indicates that the median home sale in May 2020 was \$229,900, up 7% from May 2019. First-time home buyers are finding it difficult to find affordable housing options. Even working families who qualify for the Lancaster Housing Opportunity Partnership's Homebuyers Program are increasingly having a difficult time finding homes within their price range.

Table 24. Rental Housing Pricing

Units Renting for:	Lancaster County
Less than \$500	3,510
\$500-\$699	23,667
\$700-\$999	24,090
\$1,000 or more	9,263

Source: ACS 2019 1-Year Estimates, Table CP04

The National Low-Income Housing Coalition provides annual information on the affordability of rental units relative to income information. Below is a table showing the hourly wage a Full-time employee must earn in order to afford specific bedroom sizes.

Table 25. Housing Wage

Bedroom Size	Housing Wage	Annual Income Needed to Afford
0-BR	\$13.92	\$28,960
1-BR	\$16.71	\$34,760
2-BR	\$20.98	\$43,640
3-BR	\$26.65	\$55,440
4-BR	\$28.37	\$59,000

HUD releases Fair Market Rents to be used for federal programs such as the Housing Choice Voucher Program (Section 8) and the Community Development Block Grant (CDBG) program. The FMR's are intended to represent modest cost rental housing. For purposes of comparison they are shown below:

Table 26. Fiscal Year 2020 Fair Market Rents Lancaster Metropolitan Statistical Area

Efficiency	1-BR	2-BR	3-BR	4-BR
\$684	\$812	\$1,021	\$1,293	\$1,383

Interpretation 16: The cost of housing can present an impediment for those with lower incomes. Since people of color, people with disabilities and other protected classes tend to have lower income, the cost of housing, both homeowner and rental, limits housing choice.

6. Vacancy

The 2013-2017 5-Year Estimate show that there were 10,186 vacant housing units; 2607 were for rent, 690 were rented but not occupied

Table 27. Vacancy Status in Lancaster County

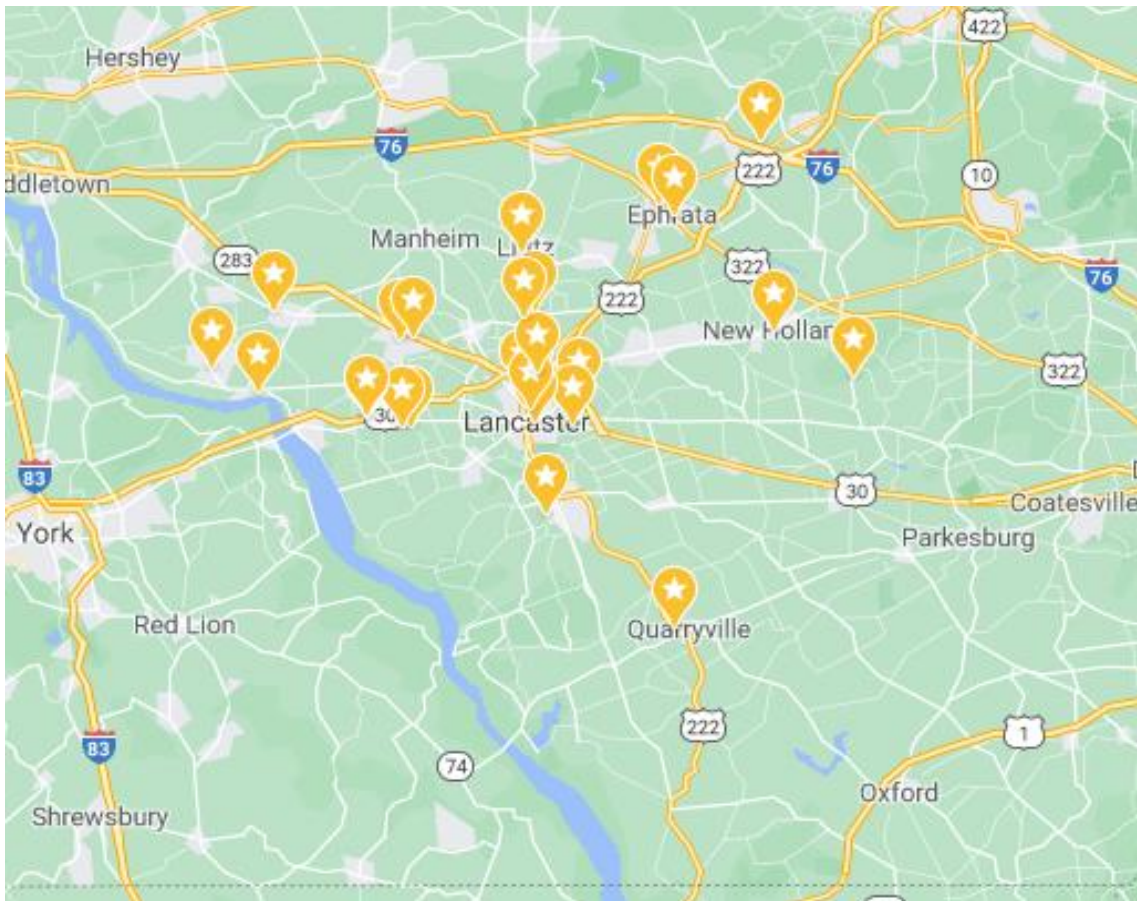
Lancaster County		
	Estimated number	Percent
Total	10,186	
For Rent	2,607	26%
Rented, not occupied	690	7%
For sale only	1,151	11%
Sold, not occupied	533	5%
For seasonal, recreational or occasional use	839	8%
For migrant workers	0	0%
Other vacant	4,366	43%

The 2013-2017 ACS 5-Year Estimates stated of the 208,751 housing units, 4.9% were vacant. The vacancy rate for homeowners was .8% and the rental vacancy rate was 3.9%.

Interpretation 17: A very low vacancy rate limits opportunity for persons to move where they may wish to live. Low vacancy rates can also increase the housing demand and therefore the cost of housing, which is an impediment to housing choice for all income levels.

7. Subsidized/Assisted Housing

Figure 12. Map of Subsidized Housing Developments in Lancaster County



The Lancaster County Housing Authority does not own any public housing; however, the Lancaster City Housing Authority owns 564 units of public housing as shown in the table below. The City Housing Authority also administers 845 Housing Choice vouchers (Section 8).

The Lancaster County Housing Authority administers approximately 735 Housing Choice Voucher Program (Section 8) for participants in the County, outside of the City of Lancaster. Households with a Housing Choice Voucher search for and sign leases for privately-owned housing. The Housing Authority also administers the “Mod Rehab” program which provides 102 units of affordable housing. There are 22 units of project based rental assistance for persons with mental health disabilities which are administered by the Housing Authority. The County Housing Authority does not own any public housing.

Beginning in late 2021, the Lancaster County Housing Authority will institute a “lottery” from a list of applicants on a waiting list. The waiting list will be opened for two weeks to online applicants only, through the Authority’s website. Software design will ensure that only complete applications are accepted. 500 applicants will be chosen by a “black box” lottery meaning there will be no human intervention in the process. Staff will review the list of 500 and eliminate ineligible applications. The resulting waiting list is anticipated to be about 300 households. As the County Housing Authority has vouchers available, applications will be pulled from the waiting list in the random order established by the lottery. This process is very similar to the procedure followed by the Lancaster City Housing Authority.

The Lancaster County Housing Authority works to ensure equal opportunity and affirmatively further fair housing by:

1. Undertaking affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, gender, familial status, and disability. The County Housing Authority will continue to work closely with LHOP’s HEEI and will continue to partner with a coalition of local agencies working to remove barriers to housing choice.
2. Undertaking affirmative measures to provide a suitable living environment for families living in subsidized housing, regardless of race, color, religion, national origin, gender, familial status, and disability. The County Housing Authority will continue its working relationship with HEEI to educate and assist landlords and management companies on fair housing issues.
3. Undertaking affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required. In addition to efforts noted have, the County Housing Authority will work with:
 - United Disabilities Services
 - County Behavioral Health and Developmental Services and
 - Vision Corp

The Lancaster City Housing Authority’s Public Housing Developments are listed below.

Table 28. City of Lancaster Public Housing Developments

Housing Development	Family Units	Elderly Units	Total
Susquehanna Court	55	20	75
Scattered Sites	96	0	96
Franklin Terrace	108	16	124
Church Street Towers	0	100	100
Farnum Street East	0	169	169
Total	259	305	564

Although the Lancaster County Housing Authority does not own public housing, it has provided funding for the construction of many housing developments in the County, often in conjunction with the Low-Income Housing Tax Credit Program. These housing developments often provide lower income residents the ability to live in integrated and affordable housing as supported by the chart below showing the racial and ethnic composition of selected developments.

Table 29. Selected Subsidized Developments in Lancaster County by Racial Composition

Development	Area	White	Black	Other	Declined to report	Hispanic (any Race)
Brunswick Farms	Mountville	28	16	10	2	34
Country Club	Lancaster	47	22	6	8	52
3 Center Square	Maytown	16	3	2	0	6
Park Avenue	Lancaster City	18	5	1	0	6
Ephrata Family Hsg.	Ephrata	8	0	1	0	4
Golden Triangle	Manheim Twp.	34	12	8	0	24
Marietta Senior	Marietta	46	7	0	0	2

Source: Community Basics, Inc. 2019

Both the Lancaster City Housing Authority and the Lancaster County Housing Authority offer a housing preference for persons experiencing homelessness. For every 5 Vouchers issued on the waiting list one Voucher will be offered to someone experiencing homelessness. The Lancaster County Homelessness Coalition will make referrals for the available Vouchers.

Table 30. Lancaster County Housing Authority Program Participants; Voucher and Mod Rehab Programs

	Persons	Percent
Race		
White	705	78%
Black	179	20%
American Indian	3	.4%
Asian	4	.4%
Pacific Islander	0	
Other	9	1%
Ethnicity		
Hispanic	399	44%
Non-Hispanic	501	56%
Other		
Elderly	170	19
Disabled	427	47

As part of the briefing provided to new Voucher recipients, the Lancaster County Housing Authority also conducts activities to affirmatively further fair housing by counseling tenants as to location of units outside of areas of poverty and assisting them to locate these units.

Fair housing training was provided to the Lancaster County Housing staff most recently in August 2019 by LHOP’s HEEI.

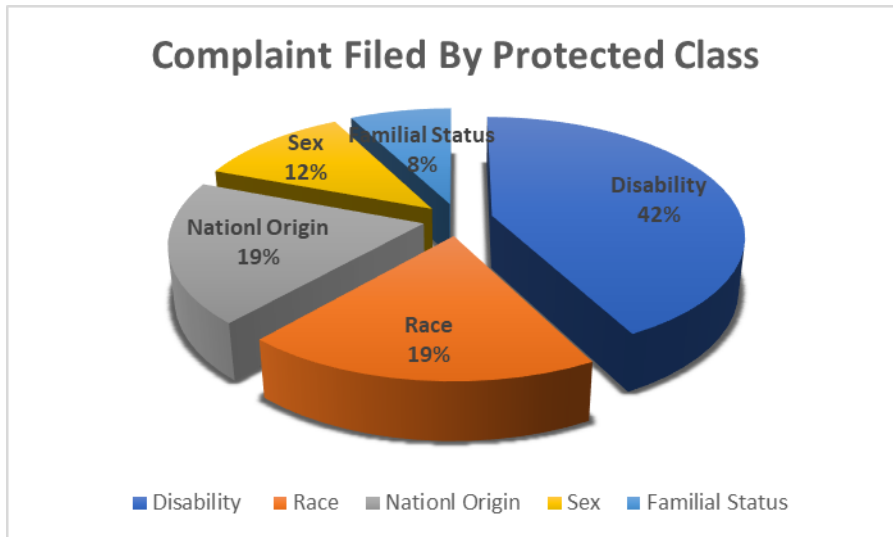
The Lancaster City Housing Authority is committed to providing reasonable accommodations to persons with disabilities. Within their developments there are 44 units that are wheelchair accessible, 15 units that are designed for persons with hearing disabilities and 12 units designed for persons with vision disabilities.

Interpretation 18: The housing assistance by the Lancaster City Housing Authority and the Lancaster County Housing Authority are critically important to those who are currently being served. However, there are thousands more in the City and County that need the assistance but cannot access it due to budget constraints and closed waiting lists.

III. Evaluation of Current Fair Housing Legal Status

A. Existence of Fair Housing Complaints

LHOP’s Housing Equality and Equity Institute (HEEI) provides a list of fair housing complaints from 2016 to April 2019. Details of those complaints are shown below.



As shown in the pie chart, the majority of fair housing complaints involved the protected class of persons with disabilities (11) followed equally by race and national origin (5 each). The remaining five (5) complaints involved gender and familial status. Of the 26 fair housing complaints filed in Lancaster County since 2016, nine (9) were from City residents and 17 were from County residents. Two (2) of these were retaliation complaints. Most complaints were filed by persons that are White, four (4) were filed by Blacks and eight (8) were filed by persons that are Hispanic. As a result of mediations and conciliations done by LHOP’s HEEI, seven (7) evictions were prevented and six (6) disabilities were accommodated.

The Pennsylvania Human Relations Commission (PHRC) is tasked to enforce state laws that prohibit discrimination under the Pennsylvania Human Relations Act. The Pennsylvania Human Relations Act was created in 1955 and amended in 1997; the Act prohibits certain discriminatory practices because of race, color, religious creed, ancestry, age, or national origin by employers, employment agencies, and labor organizations. This Act additionally created the PHRC in the Governor’s Office and defined its powers. PHRC’s mission is to “promote equal opportunity for all and enforce Pennsylvania’s civil rights laws that protect people from unlawful discrimination.”

PHRC is located in Harrisburg. The organization investigates employment and housing discrimination complaints on behalf of the US Equal Opportunity Commission (EEOC) and the US Dept. of Housing and Urban Development (HUD), respectively. PHRC continues to operate its Fair Housing Hotline (1-855-866-5718), which was established in 2013 and refers callers to the appropriate PHRC housing investigator or to

the appropriate agency when the call is not related to discrimination. The toll-free hotline has helped ensure faster processing of housing complaints and faster relief to discrimination victims.

B. Public Sector

1. Funding

- a. Community Development Block Grant Program (CDBG) – Lancaster County Redevelopment Authority administers the CDBG funds from HUD that are provided to the County of Lancaster. The City of Lancaster receives CDBG funds directly from HUD.

In 2019, the County of Lancaster will receive \$2,820,212 in CDBG funds; \$1,681,158 in HOME Investment Partnership (which is also used in the city of Lancaster); and \$242,965 in emergency solutions Grant Funds. These funds are supplemented with 1,000,000 in Program income and reprogrammed funds (funds unspent from prior years). The goals for these funds are:

- Create affordable rental units
- Create affordable owner units
- Rehabilitate existing renter units
- Rehabilitate existing owner units
- Reduce the number of blighted properties
- Support water, sewer, neighborhood street improvements, and public facilities
- Assist first time homebuyers
- Support housing services
- Support rapid rehousing services and emergency shelter activities

The City of Lancaster will receive an entitlement amount of \$1,660,779 in CDBG funds and \$142,487 in Emergency Solutions Grant (ESG) funds. The goals for these funds are:

- Provide decent affordable rental and owner-occupied housing for low- and very-low income persons
- Upgrade public infrastructure and facilities in income-eligible areas
- Provide human services for low- and very-low income City residents
- Improve accessibility for person with disabilities
- Support emergency shelters and improve support services for persons experiencing homelessness.

Lancaster County allocates funds from its Affordable Housing Trust Fund (AHTF) to encourage affordable housing development throughout the county. The Pennsylvania Optional County Affordable Housing Trust Funds Act of 1992 (Act 137) allows counties to raise revenues for affordable housing efforts by increasing the fees charged by the Recorder of Deeds Office for recording deeds and

mortgages. Lancaster County initiated its AHTF in 1994. In 2018, the County received \$354,361 in recording fees. These revenues are used to cover the required 25% match for the County's HOME Program, if needed and to provide funds to the Lancaster Housing Opportunity Partnership (LHOP) to expand housing opportunities in the County and City.

b. Continuum of Care

The Lancaster County Homelessness Coalition is the lead agency in Lancaster County and City for activities designed to resolve and prevent homelessness. Referred to as LancoMyHome, the Coalition oversees the coordinated entry system for persons seeking homeless services in Lancaster County. LancoMyHome also administers HUD funding for rapid rehousing financial assistance. LancoMyHome also completed a Strategic Plan which addressed many other related activities to prevent homelessness and assistance to help persons maintain housing.

c. Low Income Housing Tax Credit

The Tax Reform Act of 1986 includes Section 42 of the Tax Code, the Low-Income Housing Tax Credit Program. The Tax Credit program provides a tax incentive to owners of affordable rental housing. The incentive is an annual tax credit (a dollar for dollar reduction in the taxpayer's federal taxes) earned in the initial ten years following the time when the units are placed in service, assuming program requirements are met. A developer markets or "syndicates" the credits allocated to the development to investors whose contributions are used as equity in the developers' financing plan. The Pennsylvania Housing Financing Agency (PHFA) has been designated as the allocating agency for Pennsylvania. The PHFA continues to be a major source of financing for projects in Lancaster County for acquisition, rehabilitation, construction and preservation of affordable housing. The County also encourages developers to apply to the Federal Home Loan Bank of Pittsburgh which provides low-cost funding and opportunities for affordable housing and community development to 317-member financial institutions in Delaware, Pennsylvania, and West Virginia.

2. Planning, Zoning and Building Codes

The Commonwealth of Pennsylvania is structured so that municipalities have the power to establish zoning and land development plans. Each municipality's regulations and ordinances govern the type of housing that may be constructed, the density of housing and the various residential uses in a community. Local officials in each municipality determine the community's commitment to housing goals and objectives. The Lancaster County Planning Commission (LCPC) is an advisory body that reviews all proposed amendments and new municipal zoning ordinances;

however, it lacks the power to reject or amend zoning ordinances. When proposed regulations are found to be potentially inconsistent with the Fair Housing Act, LCPC continues to advise municipalities with municipal solicitors about ways to eliminate discriminatory effects.

The *2013 Analysis of Impediments to Fair Housing Choice* highlighted the potential barriers for the siting of group homes. The Lancaster County Planning Commission undertook a review of the zoning provisions related to group homes in 18 of the county's 60 municipalities. Each municipality adopts its own zoning code and is responsible for its own land use decisions; the Lancaster County Planning Commission is an advisory governmental body only and does not have jurisdiction over municipal land use regulations.

The surveyed municipalities are representative of the County, including 6 urban, 3 suburban, and 9 rural or semi-rural municipalities. The survey did not include a review of amendments that have not been codified, thus it is possible that some updates are not reflected in this review.

The goals of the survey were to A) see whether ordinance provisions related to group homes had changed at all since the 2013 AI review, and B) to identify any new or persistent zoning barriers to group homes.

Because the Fair Housing Act is constantly being interpreted and reinterpreted by the courts as it relates to zoning, it is important to note that there are no clear-cut answers, and any answers are subject to change. Thus, the findings are merely intended to draw attention to any *potential* conflicts with the Fair Housing Act, with the understanding that municipalities should always seek the advice of their solicitors when acting on fair housing issues.

Findings

Since the previous review of municipal zoning regulations related to group homes undertaken as part of the 2013 AI, there have been some important improvements. Though there are still potential barriers to group homes in some municipal regulations, overall the trend has been positive.

The first positive trend in Lancaster County group home regulations is towards specific citation of the Fair Housing Act in group home definitions. This is an important acknowledgement that municipalities are aware of the FHA and recognize their obligation to make reasonable accommodations. Of the ten communities that defined group home as a separate term, four referenced the FHA in the definition, typically stating that it was the intent of the municipality to comply with the intent of the FHA. Of the twelve communities that included group homes within the definition of family, nine referenced the FHA in the definition.

Another trend is the inclusion of group homes in the definition of family. This is important because it means that group homes are permitted just like a family, in any type of dwelling unit, wherever dwelling units are permitted. Twelve of the eighteen municipalities included a group home definition within the family definition.

There has also been improvement in how group homes are permitted. In municipalities where group homes are still defined as a separate use, a majority allow group homes as a use permitted by right –meaning the use may be approved administratively and does not require a public hearing or adherence to additional standards and criteria. Only three municipalities still allow the use as a special exception, which opens the use up to public scrutiny and additional criteria. The majority of municipalities also allow group homes in all zoning districts where other housing types are permitted.

Unlike the previous survey of municipal ordinances, none of the ordinances had requirements for minimum distances between group homes.

Though most trends are positive, there are still a handful of communities that apply additional standards to group homes that are not applicable to other dwelling types, such as requiring: group home registration or notification, additional parking, periodic inspections, or minimum staffing levels. Because such standards are generally not applicable to other housing types or family-occupied dwellings, municipalities should be sure to review them with their solicitors to ensure there is no discriminatory intent or practices that result in disparate impact.

Group homes are arguably less of an issue now than they have been in the past. The first reason is because regulations have been adjusted to be more consistent with the FHA, allowing group homes in a manner more similar to other family households. The second reason is a shift in best practices away from group home settings, and towards independent living situations.

Since many very low-income people are unable to afford an apartment or house on their own, an increased number of households are sharing housing. This has had created some resistance by zoning officers who enforce zoning ordinances concerning the number of unrelated people in one unit. This could limit housing opportunities for low- and very low-income persons in obtaining and maintaining affordable housing.

3. Property Taxes

Taxes have an impact on housing affordability. Many people in protected classes have low incomes. While not an impediment to fair housing choice specifically, real estate taxes can affect the location where people live. In Pennsylvania, property

taxes are comprised of county, municipal and school district taxes. The Lancaster County Property Assessment Office assesses real estate within the county for local property tax levy. The real estate tax is the primary source of revenue for county government. The County Treasurer is responsible for collecting taxes on approximately 130,000 of the 185,000 taxable properties in Lancaster County. Lancaster County currently collects taxes for 40 out of 60 taxing districts throughout Lancaster County. The Treasurer collects delinquent real estate taxes for the County as well as for each municipal tax for those districts that do not have an independently elected tax collector. The Treasurer's Office does not collect current taxes for any school district in Lancaster County. Lancaster County completed a countywide reassessment that became effective January 1, 2018. Assessed values are based on property market values as of January 1, 2018. The predetermined ratio is 100%.

In the City, owners of real estate pay a property tax to the County, the City, and the school district. Each of these three taxing bodies has a different rate that is set by their respective elected officials. The County Commissioners set the tax rate for property taxes paid to the County; the Mayor and City Council set the tax rate paid to the city; and the school board set the rate for property taxes paid to the school district lived in (School District of Lancaster and in the annexed areas, Conestoga Valley or Lampeter Strasburg).

The amount of property tax paid is based on the County's assessed value of real property that one owns. The assessed value of each property is not the same as the market value of each home. The market value is the value of the property, if one were to sell it.

One of the factors people consider when choosing where to purchase a home is the millage rate. Property tax rates are calculated in mills and are based on millage rates. A mill is equal to \$1 in taxation for every \$1,000 of assessed value of each real estate property.

The largest variance in millage rates occurs in school districts. The municipalities with the three highest school millage rates are:

- Columbia Borough (26.46)
- Christiana Borough and Sadsbury Township (25.6 mills)
- City of Lancaster/Lancaster Township (21.8734)

The municipalities with the highest overall millage rates are:

- Columbia Borough (37.3710)
- City of Lancaster (36.4844)
- Christiana Borough (32.182)

4. Affirmative Marketing Policy

The County Redevelopment Authority required owners of HOME-assisted units to certify that they will exercise Affirmative Fair Housing Marketing of vacant units and all other rehabilitated units in a property when they become vacant as described in 24 CFR 92.351(b) as amended. The County Redevelopment Authority also requires owners of subsidized housing to prepare, provide and maintain an approved Affirmative Fair Housing Marketing Plan. All rental housing developments that are funded with HOME funds are monitored every three years. During the monitoring, staff reviews the development's Affirmative Fair Housing Marketing Plan. However, almost all subsidized housing developments in Lancaster County have waiting lists; one senior housing development waiting list has over 200 applicants and stopped taking applications.

5. Public Transportation

As in years past, most workers in Lancaster County drive alone to their place of employment (79%). Only 9% of workers in Lancaster County carpool to their jobs. 5% of employed individuals work from home. Less than 1% of workers use public transportation, while 4% walked to work and 2% used some other form of transportation. (2013-2017 ACS 5-Year Estimates)

Claritas estimates that in 2019 9.18% of County residents did not have a vehicle while 22.1% of City residents did not have a vehicle.

Access to reliable transportation has a strong bearing on where people can live. Mass transit is rarely able to fully serve the needs of commuters. Transportation infrastructure is a determinate of where low-income housing tax credit developments are sited which impacts the location of publicly supported housing.

In Lancaster County, public transportation is provided by South Central Transit Authority which provides service in Lancaster and Berks counties. SCTA offers fixed bus routes and shared ride service. During fiscal year 2019 there were 1,778,283 rides provided on the fixed route buses and 291,921 rides provided under Shared Ride service. Both were increases over the prior two years.

Households without a vehicle are predominantly low-income households. Households without a vehicle generally have a difficult time accessing jobs and services, especially in rural areas such as the southern part of Lancaster County. Access to public transportation is critical to these households. Employment is more challenging to obtain and maintain without easy access to public transportation.

The lack of fixed route services to the southern portion of the County creates a problem for residents without a vehicle. There are few employment opportunities within a distance not necessitating a car. However, an Environmental Justice Analysis report (available at <https://lancastercountyp Planning.org/DocumentCenter/View/1243/EJ-Analysis-Full-report-FINAL>) shows that transportation investments are being made in areas where both low income and racially diverse populations reside. The report shows that public transportation in Lancaster County does serve the highest poverty and most diverse areas, thus serving the most amount of people possible.

6. Policies Affecting the Location of Subsidized Housing

The larger subsidized housing projects involve Low Income Housing Tax Credits (LIHTC) which is allocated by the Pennsylvania Housing Finance Agency (PHFA). Their policies have a significant impact on the siting of these developments. Developers seeking tax credits must follow the 2019-2020 Allocation Plan established by PHFA. The criteria upon which applications are judged include situations and conditions that are generally unavailable to the rural areas of the County. Lancaster County is included in the Urban Pool; however, there are many areas of the county, such as the southern portion of the county that are very rural in nature and as such are unable to obtain points under the Allocation Plan for selection criteria including access to public transportation and access to community services, close proximity to employment, health and retail establishments and hospitals. This puts applications for affordable housing subsidized by LIHTC at a disadvantage.

7. Accessibility of Residential Housing Stock

The federal Section 504 contains design requirements applicable to federally funded new construction of public housing or assisted housing with five or more units in the same project constructed after July 1988. It states that certain percentages of the housing must be fully accessible to persons with physical impairments (5%) and visual impairments and/or hearing impairments (2%). As can be seen below, the County exceeds these requirements in its assisted housing units.

Table 31. Publicly Supported Housing in Lancaster County by Number and Type of Accessible Units

Project Name	Total Number of Units	Handicap Accessible	Handicap Adaptable	Hearing and Vision	Hearing/Vision Adaptable
3 Center Square Apts.	23	3	3	3	0
Cloister Heights Apts.	15	1	5	1	5
Country Club Apts.	95	10	17	4	0
Dial Apts.	40	4	36	2	38
East King Street Apts.	8	3	0	0	0
Fairview Meadows Apts.	60	60	0	0	0
Fordney Road Apts.	15	7	0	0	0
Golden Triangle Apts.	58	6	16	2	0
Heatherwoods Apts.	56	3	24	1	0
Landisville II	24	7	0	7	24
Larkspur Apts.	29	2	0	1	0
Manor Heights Apts.	70	8	4	2	0
Marietta Senior Apts.	56	6	50	6	50
Mountain View Apts.	36	4	36	5	36
Park Avenue Apts.	24	4	0	4	0
Willows at Landisville	60	6	12	2	60
Walnut Street Apts.	18	2	16	2	16
Westminster Place Apts.	61	8	53	3	58
Totals	748	144	272	45	287

It is not possible to know definitively the number of private homes that are accessible.

C. Private Sector

1. Real Estate Practices

The Lancaster County Association of Realtors (LCAR) has over 1,500 members committed to providing buyers and sellers with knowledgeable, ethical and competent agents. The LCAR website contains a section on Fair Housing including links to HUD’s Accessibility Guidelines; Fair Housing and Equal Opportunity; Filing a complaint; Persons with disabilities; National Fair Housing advocate and the Landlord Tenant Act. LCAR advocates at all levels of government on behalf of consumers and Realtors for affordable housing and balanced land-use public policy. The LCAR website states “The Association subscribes to the code for equal opportunity and believes that it can best be accomplished through leadership, education, and mutual cooperation. Members are accepted without regard to race, color, religion, sex, handicap, familial status or national origin.”

All Realtors must abide by the *Code of Ethics and Standards of Practice* which includes in Article 10 “Realtors shall not deny equal professional services to any person for reasons of race, color, religion, sex, handicap, familial status, national origin, sexual orientation, or gender identity. “

2. Advertising – Newspaper and Social Media

Increasingly, rental units are advertised online and through social media and significantly less so in local newspapers. In March of 2018, HUD charged Facebook with violating the Fair Housing Act. HUD alleged that Facebook's targeted advertising platform violates the Fair Housing Act. By restricting who can view housing ads, HUD alleges that FaceBook is encouraging, enabling and causing housing discrimination. Because FaceBook mines users' personal data and uses characteristics of protected classes to determine who can view housing ads, even if it is not the advertiser's intent to discriminate. It could be possible for a landlord to exclude members of protected classes (parents, people with disabilities, etc.) FaceBook had previously entered into a settlement with civil rights groups including the National Fair Housing Alliance, the American Civil Liberties Union, the Communications Workers of America to charge its microtargeting ad system for job, housing and loan advertisements.

HUD also began reviewing Twitter's and Google's ad practices as part of housing discrimination probe. Currently the companies ask advertisers to comply with fair housing laws and non-discrimination policies when selecting their ads; however, there is little oversight.

3. Private Financing

Any commercial lending institution that makes five or more home mortgage loans must report all residential loan activity to the Federal Reserve Bank under the terms of the Home Mortgage Disclosure Act (HMDA). Most institutions involved in lending are required by HMDA regulations to comply and report information on:

- Loans denied
- Withdrawn, or
- Incomplete.

The National Community Reinvestment Coalition (NCRC) completed a report for Lancaster County analyzing data from the 2017 HMDA; 2018 FFIEC Small Business Lending; and June 2018 FDIC Branch Summary of Deposits. The analysis includes a 2015-2017 Denial Disparities by Race chart that shows how likely it is that a person of color would be denied a home purchase loan in comparison to a white borrower. A 1.0x would mean that a borrower has the same chance of being denied as a white non-Hispanic borrower. However, a 2.0x would suggest that a

borrower is twice as likely to be denied a loan as a white borrower. The methodology shows that low- or moderate-income Black borrowers have a disparity rating of 1.5x and low- or moderate-income Hispanic borrowers have a 1.4x change of denial. Interestingly, middle- or upper-income borrowers that are Hispanic have a 1.9x rating compared to a 1.2x rating for middle- or upper-income borrowers that are Black. Middle- or upper-income borrowers that are Asian have a 1.4x rating.

HMDA data for 2017 shows that denial rates for Blacks and Hispanics hover around 25% while the denial rates for White were 15%.

4. Foreclosures

While the foreclosure rate in Pennsylvania is at its lowest level since before the recession, it still has one of the highest rates in the country. In Lancaster County, the foreclosure rate declined 31% since 2016. In 2017, there were 1,054 foreclosures in Lancaster County which translates to one for every 195 houses. (Source: ATTOM Data Solutions). Foreclosures are often purchased by property owners who can put the properties back into productive use. Those that are not financially viable are frequently referred to the Lancaster County Land Bank for acquisition. Those foreclosed properties that are in deteriorated states are often referred to the Lancaster County Vacant Property Reinvestment Board for a blight determination. This formal declaration of blight enables the Lancaster County Redevelopment Authority to acquire the properties by eminent domain and sold to developers that can rehabilitate the property for productive use.

5. Alternatives to Eviction

With the moratorium on evictions due to the pandemic, many landlords are opting to refuse to renew leases to remove a non-paying tenant and obtaining a paying tenant. While this is legal, it becomes a method to avoid the purpose of the eviction moratorium which is to keep people in their homes.

D. Identification of Impediments to Fair Housing Choice

- Ongoing need for education and information due to increased population. As cited in the beginning of this document, there is projected to be approximately 25,000 additional people in Lancaster County by 2024. The additional people may need education and information about fair housing. Additionally, it is highly likely that there will be new elected officials at the municipal level that may not be aware of the fair housing requirements. For these reasons, ongoing education and information is important to prevent the impediments to fair housing choice.

- Community opposition – While there have been instances of opposition to affordable housing in Lancaster County, there have also been instances where affordable housing was built with little or no opposition. The affordable housing developers in Lancaster County have become adept at informing neighbors of proposed developments and addressing any legitimate concerns of infrastructure, screening, traffic patterns, etc. However, there sometimes remains an individual or two that continue to oppose affordable housing in general. During the planning for the creation of The Willows in Landisville, an individual repeatedly threatened to sue in order to block the development. The development was built and there appears to be no negative effects on the community.

There have been situations where it is difficult to decipher if the opposition is based on legitimate concerns or a smokescreen to prevent affordable housing. In 2016, Community Basics, Inc, an affordable housing developer, proposed a development of 138 apartments in six buildings; 111 apartments would be built with the assistance of the Low-Income Housing Tax Credit. Those units would have below market rents affordable to low income workers. The development was a part of a larger development plan that included a mix of single-family homes and multi-family dwellings. The site of the proposed development in Salisbury Township was zoned for industrial use. Neighbors expressed concern about the water table, traffic and the rural character of the municipality. Salisbury Township Zoning Hearing Board denied a special exception request for the creation of affordable housing because it wanted the land to remain zoned for industrial use. The developer contended that the lack of public water made other sites zoned for multi-family development unfeasible. The Township Supervisors states that residents “may not like this type of housing in their backyards.” After expending over \$100,000 in legal and consultant fees and foreseeing an unsuccessful outcome, the developer abandoned the plan for multi-family housing and chose to sell the 105 acres.

- Lack of community revitalization strategies

Several communities have revitalization strategies but are more often hampered but sufficient funding and private partnerships to implement the strategies.

- Lack of private investments in certain neighborhoods – The Lancaster County Redevelopment Authority and other partners continue their Borough Revitalization initiative to spur economic development in the 15 small boroughs in Lancaster County. Affordable housing is often more readily available in boroughs and by boosting economic development efforts, residents can live in a vibrant community, sometimes without relying on a car for employment.

- Lack of regional cooperation
As noted previously, Pennsylvania is a Commonwealth which means that the smallest unit of government has the authority on issues of land use, zoning, and code enforcement. While Lancaster county Redevelopment Authority is involved with the South Central Assembly to be a part of regional initiatives, it remains challenging to work regionally.

- Location and type of affordable housing

There is an overall lack of affordable housing, but the location and type of the existing affordable housing is an acceptable mix of urban and small boroughs. There is disagreement over whether there is more merit to locating new affordable housing in rural areas to provide access to low income residents; however, most funders prefer to site affordable housing near transportation routes to enable residents to use mass transit. Because there is little transportation to the southern part of the County, there has not been any new publicly supported affordable housing in that area for two decades.

- Occupancy codes and restrictions – There have been some complaints expressed by social service professionals about occupancy codes in townships and boroughs in Lancaster County that limit the number of unrelated persons making up a household. By limiting the number of unrelated people in a unit, households are prevented from sharing housing which is often the only way some households can afford housing given their low incomes. The extent to which these occupancy standards exist and are enforced and their potential impact on housing affordability should be reviewed.
- Private discrimination – While there are anecdotal stories of private discrimination, few individuals are willing to take the time and effort to file a complaint in Harrisburg. Even if the complaint were able to be filed in Lancaster, many individuals that feel they have been discriminated against want to focus on finding a place to live. For this reason, the public should not interpret the relatively low number of housing discrimination complaints as an indication of the lack of discrimination.

- Housing Conditions/ Lead Based Paint

It is likely that lead based paint hazards exist in much higher proportion in housing located in the City and the County's boroughs and rural areas, where housing is more likely to have been built before 1940 (see table X), renter-occupied and substandard. National data indicates that as many as 90% of all houses built before 1940 contain lead-based paint. According to HUD, most of the extremely low-income, low-income and moderate-income families reside in these older housing units. Lead-based paint has severe detrimental health

hazards for young children and pregnant women. In order to protect residents from lead-based paint hazards some communities like the City of Lancaster and Columbia Borough have instituted ordinances requiring the testing and remediation of lead-based paint hazards as a condition of obtaining a license for rental units. While a fair housing violation, this may have the unintended consequence of encouraging landlords to be less likely to rent to households with children. Local officials must be attuned to this possibility when enforcing the ordinances.

E. Assessment of Current Fair Housing Program and Activities

The previous Analysis of Impediments to Fair Housing Choice was completed in 2013. It quickly became apparent that the number of impediments were too high to fully address and that many of the impediments identified were for issues over which the City and County had no control or substantive ability to impact or change.

Table 32. 2013 Impediments and Progress to Date

Impediment	Action Items	Progress to Date
<p>With an increasing number of people in the county, there is more demand for an ongoing educational program for fair housing requirements</p>	<p>Provide ongoing fair housing education in the form of one-to-one contacts, group meetings, training sessions, seminars, etc.</p>	<p>Staff of LHOP provided input on the target populations where outreach was needed and formulated a plan to address the needs cited. Since people with disabilities was the basis for most complaints, many efforts were undertaken to expand the understanding of fair housing requirements for people with disabilities, reasonable accommodation, service animals, etc.</p>
<p>An increased need exists for ongoing education of municipal officials of the benefits and requirements of fair housing.</p>	<ol style="list-style-type: none"> 1. Provide ongoing fair housing education in the form of one-to-one contacts, group meetings, training sessions, seminars, etc. 2. When proposed regulations are found to be inconsistent with the Fair housing Act, the municipality should be advised to consult with municipal solicitors about ways to eliminate discriminatory effects. 	<p>Staff of LHOP provided input on the areas where outreach was needed and formulated a plan to address the areas cited. In 2018, LHOP began meeting with municipal officials to discuss fair housing issues.</p> <p>Review at least three regulations/ordinances annually for consistency with Fair Housing Act. This did not occur due to staff constraints.</p>

Impediment	Action Items	Progress to Date
	<p>3. Create an event that addresses potential fair housing concerns relating to regulations</p> <p>Provide sample ordinances that support fair housing requirements and access.</p>	<p>Hold an event to address potential fair housing concerns for municipalities. All municipal officials were invited to each of the Fair Housing Summits and several officials did attend.</p> <p>Create sample ordinances to provide to municipalities when requested. This did not occur due to staff constraints.</p>
<p>The limited transportation options make it difficult for persons without vehicles to get to where they want and need to be. This may limit fair housing choice.</p>	<p>Create a dialog between various transportation agencies surrounding current and future transportation needs and innovative ways to tackle needs.</p>	<p>The measurement was to coordinate a meeting of relevant parties to address transportation issues. This did not occur because the relevant parties agreed that transportation was not an area in which the City and County could have an impact given the funding structure for transportation issues.</p>
<p>Persons with disabilities are limited in where they go due to architectural barriers in the community and in private home construction like curbs, sidewalks, steps, narrow door openings, etc.</p>	<ol style="list-style-type: none"> 1. Continue to provide assistance to programs that assist households with persons with physical disabilities to complete accessibility modifications to their homes. 2. Provide assistance throughout the County and City. 3. Encourage affordable housing developers to increase the number of accessible units over 	<p>The measurements include:</p> <p>Maintain County funding for ADA Accessibility Programs</p> <p>Maintain funding for ADA improvements in public areas and continue to include necessary modifications in Homeowner Rehab and Critical Repair projects when appropriate.</p> <p>Evaluate effectiveness of current programs.</p>

Impediment	Action Items	Progress to Date
	<p>and above the mandated amount.</p> <p>4. Encourage private housing developers to make all construction visitable.</p> <p>5. Encourage municipalities to incentivize developers to create accessible housing.</p> <p>6. Work with employers to hire individuals with disabilities to create more buying power among individuals with disabilities. Increased buying power may provide increased housing choice.</p>	<p>Create a committee to discuss the most effective methods to encourage affordable, accessible housing.</p> <p>Hold a roundtable discussion with private housing developers to discuss the issue of increasing visitable features in housing development. This did not occur.</p> <p>Develop a draft model zoning ordinance to incentivize developers to create accessible housing. This did not occur due to staff constraints.</p> <p>Hold a roundtable discussion with relevant parties to discuss the issue of increasing employment opportunities for persons with disabilities. This did not occur.</p>
<p>Home financing data indicates a disparity between denial rates among racial and ethnic groups. However, because the sample size is statistically small, this indicates a need for further study.</p>	<p>Conduct a Home Mortgage Disclosure Act (HMDA) analysis periodically to gauge equity in housing finance. Meet with lenders to discuss concerns and partner to increase fair housing opportunities.</p>	<p>The measurement was to complete an annual analysis of the HMDA data. While the Redevelopment Authority staff has not analyzed data every year since 2013, several years have been reviewed and the data continues to show a higher denial rate for non-Whites than Whites, even when income is factored in. However, because the</p>

Impediment	Action Items	Progress to Date
		number of minorities is still significantly low, staff is cautious to definitively determine that discrimination is occurring
Lancaster County and City of Lancaster are racially and ethnically segregated.	<ol style="list-style-type: none"> 1. Provide education to housing professionals in terms of how to effectively reach and serve all persons including those with Limited English proficiency. 2. Consider conducting a survey of why people live where they live. 3. Provide comprehensive housing education and municipal services/programs and information in multiple languages to broaden awareness of choice. 	The measurement was to develop a task force or committee to determine the most effective methods to accomplish these tasks. This was not accomplished.
Homeownership rates for City residents lag behind other municipalities in Lancaster County. This may indicate a lack of homeownership education, financial education and services for City residents.	Ensure that homeownership education, financial education, services and funding are available/marketed to all citizens of Lancaster County, including City of Lancaster.	The measurement was to evaluate the effectiveness of marketing campaigns for homeownership programs.
Homeownership rates for people of color lag behind other races. This may indicate a lack of homeownership education and services for people of color.	Ensure that homeownership and financial education and services are available to everyone including people of color.	The measurement was to conduct a review of homeownership education and services to ensure that they are effectively and uniformly provided to all persons. The measure also called for the continuance of LHOP's Homeownership

Impediment	Action Items	Progress to Date
		<p>Fair and to ensure that it is effectively and uniformly marketed to all persons. LHOP administers an affordable homebuyer assistance program. It is marketed online, through printed materials, and through partner organizations, realtors, and lenders. Classes are available in both English and Spanish.</p>
<p>The lack of affordable housing in all areas of the county may limit fair housing choice.</p>	<ol style="list-style-type: none"> 1. Encourage the development of affordable housing in all regions of the county 2. Ease restrictions on multi-family housing where feasible to create more rental housing opportunities. 	<p>The measurement was to coordinate a meeting of all relevant parties to determine appropriate and effective methods to accomplish action. While no meeting was held on this topic, Lancaster County encourages affordable housing development in all areas of the county as a part of its Request for Proposals (RFP) process for HOME Investment Partnership funds for affordable housing preservation and construction.</p> <p>The measurement was to complete the Lancaster County Housing Study and ensure wide distribution. LHOP completed its Housing Study of Lancaster County as distributed it widely.</p> <p>The measurement was for the County and City to identify areas where</p>

Impediment	Action Items	Progress to Date
		restrictions exist. This did not occur due to staff constraints.
<p>People with Limited English Proficiency may have barriers to fair housing.</p>	<ol style="list-style-type: none"> 1.Ensure that all housing related documents are available in multiple languages and marketed to appropriate subpopulations 2.Create a policy concerning individuals with Limited English Proficiency 3.Provide training for nonprofits/municipalities on how to create equal access. 	<p>Lancaster County and the City of Lancaster adopted Limited English Proficiency Plans and encouraged all funded nonprofits to adopt similar plans. Part of the LEP plan was to translate housing related documents into Spanish. Marketing does not occur often for city and county as programs are already oversubscribed. To do so would be to generate demand for a service that would be unavailable. The measurement for this impediment was to publish a document on how nonprofit/municipalities can create equal access for those with Limited English Proficiency. This was not done.</p>
<p>The Pennsylvania Housing Finance Agency (PHFA) siting policies for projects using Low Income Housing Tax Credit (LIHTC) could preclude the southern end of Lancaster County from developing new subsidized housing because it does not have access to public transportation or access to community serving agencies.</p>	<p>Invite leaders together to discuss concerns and create a plan to begin to address challenges.</p>	<p>The measurement was to hold at least one meeting to discuss the issue. This meeting did not happen. This impediment, while significant locally, was not perceived to be beneficial to the future residents of proposed housing developments in rural areas. This impediment was not pursued.</p>

Impediment	Action Items	Progress to Date
<p>The distribution of Housing Choice Vouchers (section 8) in the City of Lancaster as well as the County of Lancaster is unevenly distributed. Landlords may be hesitant to participate in the Section 8 Program.</p>	<p>Educate landlords about the benefits of participating in the housing choice Voucher (Section 8) Program.</p>	<p>The measurement proposed was to publish articles on relevant websites providing education. Incorporate education in LHOP's Landlord Forums.</p> <p>Neither the City nor the County published articles in relevant websites to provide education. However, LHOP staff does talk to landlords in the course of their work and do promote the Section 8 Program to landlords.</p>

Table 33. 2021-2025 Impediments to Fair Housing

	Impediment	Action Items
1.	With an increasing number of people in the county, there is more demand for programming to educate partners on the requirements of fair housing.	Provide ongoing fair housing education in the form of one-to-one contacts, group meetings, training sessions, seminars, etc. Since people with disabilities was the basis for most complaints, many efforts will be taken to expand the understanding of fair housing requirements for people with disabilities, reasonable accommodation, service animals, etc.
2.	People with Limited English Proficiency may have barriers to fair housing	<p>Ensure that fair housing materials are available in a variety of languages and formats in accordance with Limited English Proficiency Plans</p> <p>Ensure that all nonprofits that provide housing related services make available documents in multiple languages and marketed to appropriate subpopulations or have a translator available for housing related information</p> <p>Provide education to housing professionals in terms of how to effectively reach and serve all persons including those with Limited English proficiency</p>
3.	An increased need exists for ongoing education of municipal officials of the benefits and requirements of fair housing.	<p>Provide ongoing fair housing education in the form of one-to-one contacts, group meetings, training sessions, seminars, etc.</p> <p>When proposed municipal regulations are found to be inconsistent with the Fair Housing Act, the municipality should be advised to consult with municipal solicitors about ways to eliminate discriminatory effects</p>

	Impediment	Action Items
4.	Persons with disabilities are limited in where they go due to architectural barriers in the community and in private home construction. Barriers include curbs, sidewalks, steps, narrow door openings, etc.	<p>Continue to help programs that assist households with persons with physical disabilities to complete accessibility modifications to their homes.</p> <p>Provide financial assistance for physical modification throughout the County and City.</p> <p>Encourage affordable housing developers to increase the number of accessible units over and above the mandated amount.</p>
5.	Home financing data indicates a disparity between denial rates among racial and ethnic groups. However, because the sample size is statistically small, this indicates a need for further study.	Conduct a Home Mortgage Disclosure Act (HMDA) analysis periodically to gauge equity in housing finance. Meet with lenders to discuss concerns and partner with lenders to increase fair housing opportunities
6.	Lancaster County and City of Lancaster are racially and ethnically segregated.	<p>Provide comprehensive housing education and municipal services/programs and information in multiple languages to broaden awareness of choice</p> <p>Promote and incentivize the development of affordable housing in both the rental and homeownership market close to employment, transportation, education and commercial resources</p>

	Impediment	Action Items
7.	Homeownership rates for City residents lag behind other municipalities in Lancaster County. This may indicate a lack of availability and or accessibility of homeownership education, financial education and services for City residents.	<p>Ensure that homeownership education, financial education, services and funding are available/marketed to all citizens of Lancaster County, including City of Lancaster</p> <p>Promote the development of affordable homes in the homeownership market through the purchase and rehabilitation of blighted and/or abandoned properties before they enter the home-flipping market.</p>
8.	Homeownership rates for people of color - are disproportionately low.	<p>Ensure homeownership and financial education services are available in communities of color</p> <p>Partner with housing development organizations to promote the development of affordable housing for purchase through targeted funding opportunities in communities of color</p> <p>Conduct county wide housing study to gain comprehensive information about available housing</p>
9.	The lack of affordable housing in all areas of the county may limit fair housing choice.	Encourage the development of affordable housing in all regions of the county
10.	The geographic distribution of Housing Choice Vouchers (section 8) in the City of Lancaster as well as the County of Lancaster is unevenly distributed.	<p>Educate landlords about the benefits of participating in the Housing Choice Voucher (Section 8) Program</p> <p>Educate the community by correcting myths and reversing the stigma about households with Housing Choice Voucher</p>

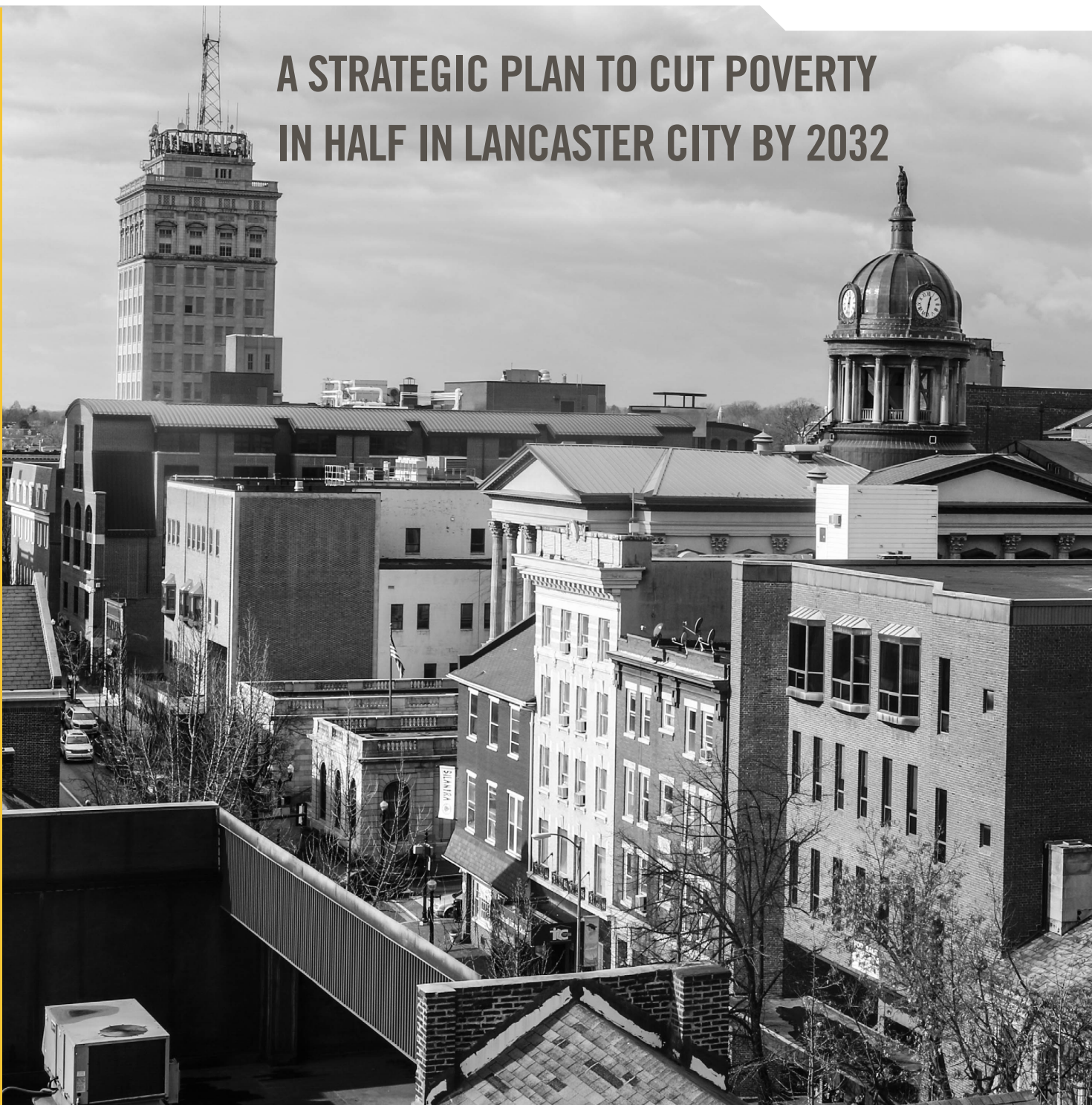
	Impediment	Action Items
11.	Housing Codes, including lead-based paint ordinances could inadvertently encourage discrimination against families.	Provide financial assistance to landlords to remediate lead-based paint hazards in rental units and address other housing code hazards



THE MAYOR'S
**COMMISSION TO
COMBAT** **POVERTY**

ONE GOOD JOB

**A STRATEGIC PLAN TO CUT POVERTY
IN HALF IN LANCASTER CITY BY 2032**



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WAYS IN WHICH A COMMUNITY HELPS PEOPLE IN POVERTY

- Enabling -



FOREWORD

The plan you are about to read is not a step-by-step instruction to build a silver bullet for resolving poverty. While people often desire simple, digestible answers to challenges, poverty is complex and will not be solved by any one solution or even set of solutions. It requires strong systems that are collaborative and agile enough to shift for each new challenge.

The plan you are about to read is not an indictment of any community member or group. We are not looking to litigate the past, but rather to set a course for the future. We are all responsible for the current state of our community, and we will all need to take that responsibility seriously if we are to succeed.

The plan you are about to read is not about a new program or intervention. The truth is, almost every time a Commission member or a resident suggested a program that would help, someone else would point out that their idea already existed and which church, nonprofit or government office already offers it. Some of the most impressive evidence-based practices we reviewed were firm believers that specific programs, while necessary tools, are less important than the strength and connectivity of the community and the systems that are established to solve problems.

This plan is a blue print and a series of first steps to build that kind of community and those kinds of systems. It is open-ended enough to allow residents who are struggling with these issues to sit at the leadership table and guide not just the details of the implementation of this document, but also its inevitable and expected evolution. What works on Duke Street may not work on Queen Street. What works in the Southeast may not work in the Southwest. This plan must remain flexible.

This plan is also firm in its insistence that residents who understand poverty best must be at the table shoulder to shoulder with clergy, employers, policy makers, academics and the nonprofits that have initially agreed to be accountable for the process. Every sector of our community must be engaged.

This plan is a call to action: to bring your wisdom and energy to bear on this crucial starting point, and work with us to make this imperfect plan more perfect through your effort. There will be much to do now that this document has been bound and released: specialized action teams to fill with people who can get things done across a broad spectrum of goals. We hope you're one of those people.



LETTER FROM THE CHAIR

December 15, 2016

We have always been known as a generous nation. In times of great need, both at home and abroad, Americans give. That is even more true of Lancastrians. Here at home, our own Extraordinary Give eclipses the outcomes of similar giving days in Counties ten times our size and with median incomes higher than our own. If philanthropy alone was the answer to reducing poverty, we would have solved this long ago.

The truth is, reducing poverty is going to take significant changes in all our systems, from our struggling communities and the people that live in them to our nonprofits, our government and our businesses. At a time when greed is strip-mining our most vulnerable communities and their residents, system changes are crucial. Given our generosity, real systemic change in Lancaster especially would be incredibly fruitful. That said, we should be clear that there will be forces aligned against us.

Predatory businesses like payday lenders currently profit from draining the resources from the families in our community that can least afford to be taken advantage of. Absentee slumlords do the same to our people even as they allow our neighborhoods to crumble, attracting more crime and less opportunity. The worst of our employers pay adults the kind of wages only fit for a high schooler's summer job, and keep them at reduced hours to avoid enrolling them in health insurance.

In the case of each of these poverty profiteers, the bill that comes due is never paid by them. Whether it be a hospital bill because people don't have a medical home, or property taxes because we don't have a diverse enough tax base, or the cost of our criminal justice system because we don't offer and incentivize opportunities for people in poverty to earn family sustaining wages (in fact, our government policies create disincentives), the bill is paid by our taxpayers and by our philanthropists.



Our allowance of greed, classism and structural racism is not only unsustainable, I would argue that it is fundamentally un-Lancastrian. This is not who we are, but it is who we are in danger of becoming if we do not change course.

Poverty is not just a city problem. Two thirds of the poverty in our County lies outside of the City of Lancaster. Poverty is not caused by minorities and immigrants. Two thirds of the people living in poverty in our County are white. Poverty is on the rise in our County, even as it is falling in the state as a whole. We can do better. We can be better.

All of the things that make Lancaster such a giving community also make the strategies and goals of this plan possible. That's because at the heart of generosity is a willingness to share and a desire to build a better world: to change and save lives. And while our willingness to share philanthropically will continue to drive the scale of our work, it will be

our willingness to share at a deeper level that will determine our success or failure.

We must be willing to share the hard work that lies ahead. We must be willing to share our existing resources. We must be willing to share our data and what we know. We must be willing to share opportunity. Ultimately, we must be willing to share accountability, both the credit when we succeed and the blame when we fail.

This is not someone else's responsibility. It belongs to all of us. Perhaps that's what gives me the greatest sense of hope. If any community can come together to move a mountain, not just with financial generosity but with generosity of spirit and grace, it is this community. We all know Lancaster is special. What lies before us is one more opportunity to prove it.

- Dan Jurman, MAR
CEO - Community Action Partnership



INTRODUCTION

In August of 2015, the Franklin and Marshall College Floyd Institute for Public Policy published the report “Lancaster Prospers? An Analysis of Census Data on Economic Opportunities and Outcomes” highlighting that while incomes had gone up in the downtown, they had gone down in all of the surrounding census tracts. This data analysis prompted Mayor J. Richard Gray of Lancaster to create the Mayor’s Commission to Combat Poverty stating the following “Poverty is both an economic development issue and a moral issue that challenges our ideals of social and economic justice and undermines our quality of life.”

Mayor Gray received over 90 applications from people interested in joining the Commission, and by October of 2015 had chosen 12 volunteer Commissioners and 46 volunteer work group members. The 58 people selected (which grew to 60 by January of 2016) represented people from all walks of life; different ages, ethnicities, income levels and disciplines. The only people excluded were individuals from the political sphere, including the Mayor himself, in order to keep the Commission from becoming politicized and to allow it to openly discuss all the causes and effects of poverty, including those that are less politically palatable.

The Mayor provided the Commission with the following charge:

The Mayor's Commission to Combat Poverty will:

1. Conduct a thorough examination of the factors that contribute to high levels of poverty in the City of Lancaster in order to increase our understanding of the realities, challenges, and multiple dimensions of poverty in our community.
2. Recommend policies and practices that can be adopted by government, the business community, service providers, advocates, and individuals to help reduce poverty in our community.
3. Produce an Action Plan that includes specific action steps, priorities, and measurable poverty reduction goals, with a timeline for reaching those goals.

The work groups the Mayor established were as follows:

Barriers & Best

Practices: Identify institutional, systemic, situational, cultural, and behavioral barriers to achieving financial self-sufficiency. What has been done by other communities to reduce poverty? What specific actions, policies, or programs have been successful?

Access to Capital:

Social & Financial:

Examine the impact of public and private sector wage and hiring practices on poverty. What resources are available for small business start-ups? How does financial literacy, credit rating, predatory lending, etc. contribute to poverty?

Core Services: Is healthy

food, quality housing, adequate health care, transportation, and child care accessible and affordable for working families and single-parent households? To what extent does unmet need for these basic essentials contribute to growing poverty?

Education & Training:

Are our residents job-ready? Are we training for the job market? Do we take full advantage of apprenticeships, mentorships, and internships? What are we doing to provide opportunities for those re-entering our community from prison?



Funding for the work of the Commission came in the form of grants from the Lancaster County Community Foundation, Franklin and Marshall College and cash and material donations from ASSETS and the Community Action Partnership of Lancaster County. Two staff were hired in November of 2015 to carry out the day to day work of the Commission: an Administrative Coordinator and a Research Associate. The work of the staff was augmented by over two dozen interns and volunteers from Franklin and Marshall College, Millersville University and Penn State Hershey.

The process for the work included orientation and training for the Work Group and Commission members between November of 2015 and January of 2016 followed by seven months of data analysis, review of best practices, webinars, and meetings that took the following form:

- Commission meetings: monthly for 14 months to examine local data, review best practices, and incorporate findings into an action plan with timelines and accountabilities for implementation.
- Listening tour and community events: engage residents in each quadrant of the city with community conversations and Commission attendance at existing community events.
- Public Hearings: four meetings to hear expert testimony and elicit public opinion on each of the four areas of focus.
- Work Group meetings: five facilitated review and brainstorm/workshop sessions after each hearing to develop findings and prioritize best practices and actions.

As a result of this process we collected more than 400 survey responses, hosted more than 500 people at four public hearings, and had in-depth conversations with more than 100 Lancaster residents who are currently living below the poverty line to discuss their most pressing issues. We've been in churches, schools and community centers, and we've met with students, seniors, immigrants, adults in workforce training, and citizens re-entering society from prison. We've also looked at poverty commission reports from 11 cities, including Richmond, Virginia.

From the beginning, Mayor Gray expressed his desire for the Commission to be both action and goal-oriented. The work was never intended to be just one more in a long line of reports that would identify the problem and then sit on a shelf. As such, he set the following goals for the Commission:

1. Policy-makers, service providers, business community, and the public have an increased awareness and understanding of the scope, nature, and consequences of poverty in the City.
2. The business community, service providers, advocates, and those experiencing poverty are engaged in creating a plan of action.
3. Specific action steps that the community can take to help alleviate and reduce poverty are accepted and prioritized.
4. Measurable poverty reduction targets and goals are adopted, along with a timeline for reaching those goals.

While many core issues were crystal clear and showed up again and again in the data, community conversations and brainstorming sessions, how to



“What can we do now to combat poverty?”

Dan Jurman, Chair



move those issues in the right direction is less so. It will require taking risks and trying new approaches if we want new results. While there will be trial and error, that process will be bolstered by ten guiding principles derived by the experiences of our community as well as the best practices from successful anti-poverty interventions from around the Country. Those guiding principles are as follows:

1. **Collective Impact:** collective impact occurs when organizations from different sectors agree to solve a specific social problem using a common agenda, aligning their efforts, and using common measures of success.

Core Components:

- A. Common Agenda - coming together to collectively define the problem and create a shared vision to solve it.
- B. Shared Measurement - agreeing to track progress in the same way, which allows for continuous improvement.
- C. Mutually Reinforcing Activities - coordinating collective efforts to maximize the end result.
- D. Continuous Communication - building trust

and relationships among all participants.

- E. A Strong Backbone - having a team dedicated to orchestrating the work of the group.
2. **Public Health:** public health is the science of protecting and improving the health of families and communities through promotion of healthy lifestyles, research for disease and injury prevention and detection and control of infectious diseases. Overall, public health is concerned with protecting the health of entire populations. These populations can be as small as a local neighborhood, or as big as an entire country or region of the world.

Public health professionals try to **prevent problems from happening or recurring through implementing educational programs, recommending policies, administering services and conducting research** – in contrast to clinical professionals like doctors and nurses, who focus primarily on treating individuals after they become sick or injured.

3. Genuine Community Ownership/

Leadership: no plan to reduce poverty is going to succeed unless the community residents most affected by poverty can lead it, own it and take responsibility for it. We cannot rely on “lip service” community involvement, but must take the time and invest the resources to engage and develop true, grassroots leadership within the impoverished community and put those leaders at the forefront of our efforts.

“Diverse community members—those most affected by adversity; those committed to improving the lives of children and families; and those ready and willing to offer resources that will support small, iterative layers of change—must engage in hopeful, creative dialogue about how they want things to change, and then begin and sustain the process with small changes that will build into larger transformations.” *Self-Healing Communities: Robert Wood Johnson Foundation – June 2016.*

4. Adverse Childhood Experiences (ACEs):

“Childhood experiences, both positive and negative, have a tremendous impact on future violence victimization and perpetration, and lifelong health and opportunity. As such, early experiences are an important public health issue. Much of the foundational research in this area has been referred to as Adverse Childhood Experiences (ACEs).” *Centers for Disease Control*

5. Building Adult Capabilities: “Science tells us that it is never too late to help adults build up their core capabilities, and that we can have a life-long impact if adults support the

development of these skills in childhood. When adults have opportunities to build the core skills that are needed to be productive participants in the workforce and to provide stable, responsive environments for the children in their care, our economy will be stronger, and the next generation of citizens, workers, and parents will thrive.” *Harvard University*

Social Ecological Model

	Determinants
Individual	Knowledge Attitudes Skills Intentions Values
Interpersonal	Social norms Social influence Social support system Informal social networks Families Work and peer groups Neighbors
Organizational	Organizational: culture, policies, norms, incentives for health, Management styles, Communication
Community	Social resources, Social identity, Relationships among community groups, Community norms, Power structures
Policy	Legislation, Policies, Taxes, Regulations

6. **Personal Responsibility and Systems**

Responsibility: we must balance our focus between personal responsibility for individual decisions made that perpetuate poverty and systems responsibility for policies that perpetuate poverty. Between these two extremes are interpersonal connectivity, organizations and community. We have framed our work within the Public Health “Social Ecological Model” in order to ensure that we are taking action that bears fruit at each of these levels.

7. **Non-Judgmental and Compassionate:**

while we believe that people must be responsible for their own decisions and actions, we also believe that we cannot help people and judge them at the same time. Being compassionate and mindful of the context of people’s lives and choices are strategic decisions to allow us to help them move forward on a different path. We believe in second chances and in every person’s ability to change. We also believe in the Bridges Out of Poverty precept that “no significant change happens outside of significant relationship.”

8. **Equality and Connectivity:**

while divisiveness and segregation have seen their ebb and flow over the decades, the fact remains that we are too inclined to separate each other into races and social classes in a way that perpetuates inequality. We believe that our work will only succeed if we can be inclusive in a way that puts people who have been disenfranchised on an even playing field with every other member of the community and emphasize the things that can bring us together for our common purpose. That means those who enact this

plan must actively speak out against forces like structural racism and NIMBYism which perpetuate poverty in our community.

9. **Objectivity/Data-Driven:** Data will be a central piece of both our decision-making and our determination of ongoing success and failure. Census tract data will be used to help us identify geographic priorities as well.

10. **Hope:** We must work to rebuild hope with and for those who have been left behind in our community. While more difficult to measure, hope may be the most important ingredient if we are to succeed. In order to nurture hope, we must begin by taking action that backs up our words with actions and results and prove to ourselves and to the community at large that reversing the trends of decades-old challenges is possible.

Using these guiding principles to navigate the incredibly complex, embedded and daunting challenges we face as a community has led to the recommendations and endorsements of this plan. Our Commission represents decades of nonprofit and business experience, and thirteen months of wrestling with issues like jobs, transportation, housing, housing segregation, red-lining, childcare, family-structure, teen pregnancy, drug addiction, personal responsibility, racism, institutional racism, municipal politics, county politics, school districts, predatory businesses, and local, state and national policies that perpetuate poverty.

Within our membership were representatives of:

- The Lancaster County Coalition to End Homelessness - the first homeless services provider in the nation to bring both veterans

homelessness and chronic homelessness to functional zero.

- The United Way of Lancaster County - the first United Way in the nation to completely transition to a collective impact funding model.
- The Community Action Partnership and Lancaster General Health - working together with the Coalition to End Homelessness and the United Way to build the nation's first web based, shared, case management database available on a pay-what-you-can basis for all nonprofit social service providers and churches across the entire County. County-wide CaseWorthy will be launching in 2017.

Among 60 disparate voices, we did not always agree with what was a cause of poverty and what was a symptom. People could rightly doubt the veracity of our process if we had. We did agree on several crucial points. We agreed that we wanted to get as far upstream as possible, attacking the root causes of poverty. We agreed that we wanted to give families the tools to escape poverty, not just make them more comfortable while they're there. We agreed that poverty is not just a problem for the City of Lancaster, but is a County-wide problem. In fact, two-thirds of the poverty in this County lies outside of the City and 66% of the people living in poverty in Lancaster County are Caucasian. We agreed that there is no way to address poverty in the City of Lancaster without addressing poverty in the county as well as acknowledging our shared interests and the opportunities of this moment in history throughout Lancaster County.

What lies within this plan is a blueprint for changing individual behavior, building community leadership and connectivity, strengthening our

organizations, mobilizing our community and actively seeking policy reform that incentivizes work at a family-sustaining wage. **It is important to note that we can't cherry-pick from among these strategies. This is a comprehensive plan, and all of these strategies need to be enacted if we are to succeed.** This plan should also be seen as a beginning in an ongoing cycle of planning, innovating, implementing, measuring results, and deciding next steps.

What we ultimately hope to accomplish, **the reduction of poverty in the City of Lancaster by 50% over the next 15 years**, will not be easy. That said, those of us who spent the past thirteen months contributing our time and our talents to this plan believe it is achievable, but only if we come together and create broad systems changes in a way unprecedented in our community's history. If there is a community that can achieve such a feat, we believe it is Lancaster County.



AN APOLOGY

“

“A lot of what used to be beneficial in our community, in the Southeast, is gone. The Urban League left, homes, jobs -- the kids don't want to stay anymore because there's no jobs.”

- July 26, 2016

”

During our *Barriers and Best Practices* public hearing, Thad Williamson, our guest speaker from the Richmond, Virginia Mayor's Anti-Poverty Commission, advised us to own our community's sins in our report as a way of opening the door to healing and moving forward together. We thought this was wise counsel. As a result, we felt it was very important to lay out how the Southeast quadrant of the City of Lancaster came to be the home of the highest concentration of poverty in Lancaster County.

In his book, "A City Transformed: Redevelopment, Race, and Suburbanization in Lancaster,

Pennsylvania, 1940-1980," David Schuyler draws a clear picture of how we got where we are today:

Urban redevelopment transformed Lancaster. The comprehensive revitalization program planned and implemented by the Redevelopment Authority of the City of Lancaster changed the physical shape of the southeast quadrant of the city and, through demolition, destabilized the city's African American community... Segregation framed the boundaries of the neighborhoods designated for residential renewal, which had a devastating impact on the city's African American population.

As recently as this past Spring, LNP's Jeff Hawkes brought the story of the City's segregation front and center. In his May 19, 2016 article "How Racial Segregation and 1960s Urban Renewal Embedded Poverty in Lancaster's Southeast," Hawkes describes how red-lining and racism gave minorities in Lancaster few options but the south side of the city while urban renewal concentrated poverty in the same part of the city.

It was a hard-working community that wanted better jobs and greater opportunity. Instead it got change it hadn't sought: Demolition crews in the 1960s razed whole blocks of the Southeast — places where people with a range of incomes lived — to make way for public housing for thousands of Lancaster's poorest residents.

The government called the initiatives of the 1960s "urban renewal." But the Southeast experienced nothing of the sort. Instead, poverty only deepened, and neighborhood cohesiveness collapsed. The impact reverberates today.

But in the late 1950s, Lancaster's civic leaders, residents of almost exclusively white neighborhoods, associated the Southeast not with nice people in nice houses, but with junkyards and pockets of blight. Prodded by federal policies playing out in cities across the country, they chose wide-scale demolition and big housing projects as the remedy.

By one count, 976 buildings, almost all of them homes and many of them habitable and salvageable, came down in the '60s and early '70s, making way for clusters of subsidized projects of bland low-rise and high-rise housing that define much of the Southeast today.

Segregating so much poverty to one part of the city has perpetuated poverty. The futures of the

Southeast and the families who lived there were taken, and were replaced with something much more grim. Today, the Southeast has a poverty rate on par with places like Detroit. While no one serving on the Commission was a part of that urban redevelopment effort or the decisions that were made, it is our responsibility to apologize.

No apology can bring healing, however, while the offense continues. Today, in the twenty-first century, municipalities all across Lancaster County continue to allow pockets of segregated poverty to exist, both in the city and in their own jurisdictions. Creating zoning and other barriers to affordable housing projects near large employers outside the city deepens poverty by increasing housing and transportation burdens on working families.

Segregating poverty to the city also segregates poverty to the School District of Lancaster and creates an unsustainable burden on that district's teachers and students. All this while studies show that high concentrations of poverty in schools is detrimental to all students while integrating impoverished students into more affluent schools has positive impacts on those students with no detrimental effects to the other students attending those schools.

The Century Foundation, which has been studying school integration and its effects for two decades, put it like this in an October, 2016 report:

The case for pursuing these policies is powerful: low-income students in mixed-income schools are as much as two years ahead of low-income students in high-poverty schools; and diversity benefits middle-class students as emerging research has shown that being in diverse learning environments can make students smarter.

We're sorry for the segregation practices that brought our city to where it is today. We're sorrier still for the racism, classism, NIMBYism and short-sightedness that keep our city segregated today. Being sorry isn't enough, though. We'll need your help to push back against these philosophies and policies, and set the south side of the city back on a path toward prosperity. Only then can our apology truly be accepted.



ASSETS

Lancaster City is a jewel in the heart of Lancaster County. While much of the data reveals inequalities and troubles in our community, it's important to recognize that we already have a great community, and much of the means necessary to solve our problems.

Lancaster is a business, culture, and educational center in its own right. We're home to large and growing companies, an increasing number of art galleries, theatre companies, and music venues.

There is a deep ethic of hard work in Lancaster, and a tradition of welcoming others. Church World Services, among others, assists those who come from abroad fleeing violence and privation. Almost

5% of Lancaster County residents were born in another country,¹ but are here because this is a place, traditionally, where effort means opportunity and goodwill means community.

Indeed, we have fallen short of this standard at times, but when we live up to it, look at what we can become: a thriving, if small, regional hub, attracting corporate and political interest from around the world.

Fundamentally, Lancaster County is a place where people belong, and the Commission intends to honor that by ensuring that its opportunity is accessible for all residents. In structuring our future, it helps to take stock of what this community

of thinkers, neighbors, dreamers and doers has already created. It is impossible to mention all of our community assets in a report like this. The following is just a small sample:

Lancaster City Alliance was formed from two existing neighborhood advocacy groups, the James Street Improvement District and the Lancaster Alliance, and is an avenue by which city residents could affect change. They provide ambassadors and clean-up crews for the Northwest and downtown areas, as well as advocating locally and nationally for Lancaster. Their Building on Strength strategic plan charts a path forward for Lancaster into the future.

Mentoring organizations like Exit Lancaster and Children Deserve A Chance work with our middle and high schoolers to keep them focused on their education and help them access internships and post-secondary opportunities. These non-profits reach young people throughout the County and play an integral role in developing our future.

United Way's 211 Network is a comprehensive, 24/7 information and referral service, which includes translation services and connects Lancaster County residents to providers that can meet their health and human services needs. The network is a service of the Lancaster County United Way, which is the first in the nation to move to a 100% collective impact model to maximize the impact of their investment in our community.

Lancaster's charitable food network, anchored by the Central Pennsylvania Food Bank, served 43,000 undifferentiated individuals last year, with the Lancaster County Council of Churches, CAP, and a variety of other churches and non-profits. Community meals, soup kitchens, and other meal programs serve 375,000 meals per year. This

network is an important ally in the fight against hunger.

SACA Development, an arm of Lancaster's Spanish American Civic Association, provides a significant portion of the city's affordable housing, developing "new" neighborhoods in the Southeast area. Partnering with local banks to finance new development projects, and the Workforce Development Board to provide job training and career counseling. SACA Development acts as a community development corporation and a valuable asset for the whole Southeast.

Community Action Partnership, in addition to being the largest social services non-profit in Lancaster County, is Pennsylvania's largest community action agency. Over the past three years CAP has been changing its service model from a siloed, transactional model to a collaborative, relational model. This has culminated in the complete restructuring of the agency to affect greater impact on poverty reduction.

Community First Fund is a community development lending institution that "creates sustainable prosperity for low wealth communities and individuals, especially persons of color and women, by aligning capital, knowledge and advocacy to advance business ownership, housing and community development" in Lancaster and the region. At the end of their last fiscal year, their capital under management grew to \$78.4 million.

Lancaster Housing Opportunity Partnership is focused on housing affordability for low and moderate income individuals in Lancaster. They offer a community home buyer program, a housing resource center, affordable housing development, advocacy and community outreach. Their community organizing efforts in the southwest

quadrant of the city are setting a new trajectory for residents there.

ASSETS is a forward-thinking non-profit that seeks social change through business. By providing would-be entrepreneurs with loans, business counseling, and technical support to clients who would otherwise find accessing such services difficult, they create much needed diversity in Lancaster's for-profit environment. ASSETS also champions a more responsible, community-minded approach to business in Lancaster, certifying benefit corporations through their "Measure What Matters" campaign.

The faith community forms a significant part of public life in Lancaster. Churches, synagogues, and other faith centers help form the backbone of charitable works in Lancaster County, without which many efforts to feed the hungry, provide for the poor, and educate children in the county would be short-circuited.

Lancaster General Health, now part of the Penn Medicine regional health network, is more than just a hospital. From their multiple sites, they advocate for community health, evaluate and analyze needs, provide hundreds of local jobs, and serve as an anchoring institution in our community. LGH is an innovator in their strategic thinking around health disparities in impoverished populations in that they are focusing on social determinants to improve health outcomes.

SouthEast Lancaster Health Services is one of three Federally Qualified Health Centers active in Lancaster County. Serving the city, SouthEast provides a high quality, comprehensive medical home to 22,000 patients, most of whom are uninsured or underinsured.

Lancaster Chamber of Commerce and Industry is a collection of 2200 community-minded businesses throughout Lancaster County. Providing service, leadership, and data to entrepreneurs in Lancaster County, the Chamber aims to leverage "the collective power of this group to weigh in on legislative and community issues that affect Lancaster County's business climate and quality of life."

The Lancaster County Community Foundation provides grants to agencies and efforts that seek to improve Lancaster County, with a particular focus on creative or innovative solutions. Much of Lancaster County's charitable giving and granting is connected to the Community Foundation. Their annual "Extraordinary Give" is Lancaster's largest single giving event, directing millions of dollars to deserving non-profits.

Thaddeus Stevens College of Technology on the east end of Lancaster City, is a 900-student, two-year technical college that trains Lancaster-area students in skilled trades. The college, which has a 111-year history, has a 96% placement rate for graduates, providing its students with a clear path to higher-than-poverty wages.

The High Companies is a diverse group of companies based in Lancaster, Pennsylvania, extending into such industries as steel, construction, transit, real estate and hospitality. With a projected need to hire over 1000 employees over the next 5 years across a wide range of disciplines, the High Companies are engaged in innovating new employee investments, such as support services and transportation solutions, that will allow them to better support current employees while meeting future hiring goals.



THE DATA:

POVERTY IN LANCASTER CITY

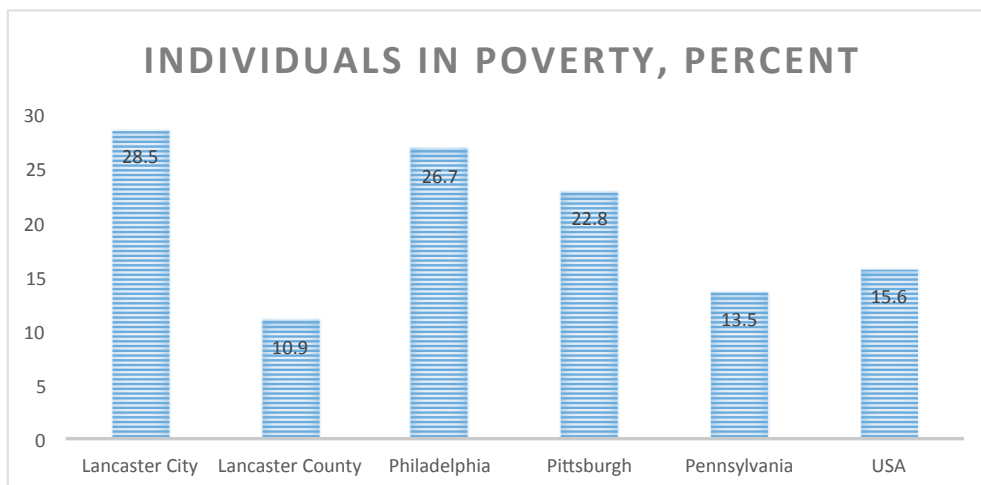
“We need everybody here to put their minds together and try to figure out some way to help the people on the South side of Lancaster.” - public hearing testimony

An accurate description of Lancaster can be difficult to come by. Those unfamiliar with the area may be surprised that there is a city in the heart of Amish Country. Even those that live here struggle to describe its charm, opportunity, and innovation alongside the concentrated poverty that thousands of Lancaster residents face.

Indeed, much of the city was put on alert by Franklin & Marshall’s report from last year. Millions of dollars in public and private investment

transformed the downtown area in a positive way,² and while the city has invested significantly³ in the South Duke Corridor, the South Queen/ Prince Corridors and Cabbage Hill, corporate/ private investment in these areas has been lacking. Investment creates jobs, and where it is absent, community economic development can only stall. At the release of that report, American Community Survey data⁴ indicated that the poverty rate in Lancaster was 31%, higher than Philadelphia or Pittsburgh.

Figure 1 - Poverty by Geographic Area⁵



American Community Survey 2010-14 5-YR Estimates - S1701

Though more recent data indicates a lower poverty rate in our city, the truth of poverty in Lancaster is not fully told by saying that 28.5% of Lancaster residents are currently poor⁵, which is still higher than Philadelphia (26.7%) or Pittsburgh (22.8%).

Poverty does not affect all Lancastrians equally or in equal proportion. Our residents face economic and opportunity disparities along lines of race, gender, age, and geography, and face barriers to educational attainment and employment opportunity.

Poverty is present among different demographics in different proportions. We approach poverty with the belief that effective solutions are not one-size-fits-all, and recommend that others do the same. As such, an understanding of poverty in Lancaster requires an understanding of its prevalence among different populations.

Race

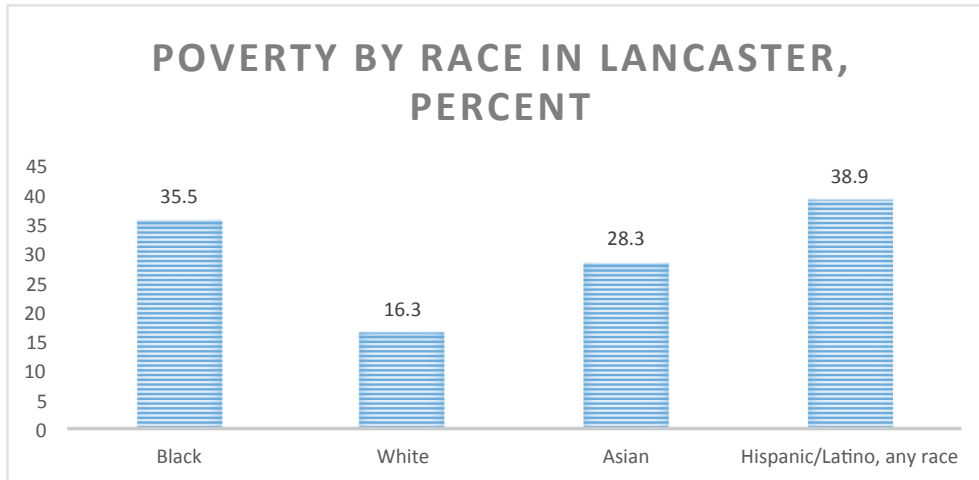
Lancaster city is demographically very diverse - only about 41% (24,468) of the population are non-

Latino whites, and its racial demographics are in flux. Latinos of any race now constitute 40% of the city's population. This is not so much an unforeseen demographic shift, but the next step in a long trend; in 2000, Latinos made up less than one-third (30.8%) of Lancaster City. Currently, African Americans make up 17% of the city's residents.⁶

About one-sixth (16.3%) of Lancaster City's non-Latino white population lives below the federal poverty line. By contrast, 35.5% of the African American population, twice that of whites, and 28.3% of Asian Lancaster residents live below the poverty line, a rate similar to that for the whole city. Those claiming origin from two or more races fare significantly worse, with 45.1% living below the poverty line, almost half of this population of 2,500 people.

38.9% of those claiming Hispanic or Latino origin, of any race, live below the poverty line. These racial disparities, and the preconditions and history which contribute to them, cannot be ignored. In the wake of the economic downturn of the late 2000s, African Americans and Latinos in Lancaster are still

Figure 2 - Poverty by Race⁵



ACS 2010-14 5-YR Estimates - S1701

experiencing higher poverty rates than they were at the time of the 2000 Census.⁷

Concentrated poverty, defined as an area where more than 40% of the area population lives under the poverty line⁸, is “corrosive...setting up a cycle of decline...and an intensified poverty trap,” according to Harvard sociologist Robert Sampson⁹. People living in these areas experience a “perpetual shortage of finance capital, stores, employment opportunities, and institutional resources” and “communities with serious crime, health, and education problems that, in turn, further restrict the opportunities of those growing up and living in them.”¹⁰

Lancaster City Census Tracts that meet this definition (7, 9, 147) are all 49% or more composed of people of color. Taken together, 75.8% of people living in these concentrated poverty tracts are of color.⁵ This segregation, not an accident of history or situation, only makes intergenerational poverty in communities of color more intractable.

Gender

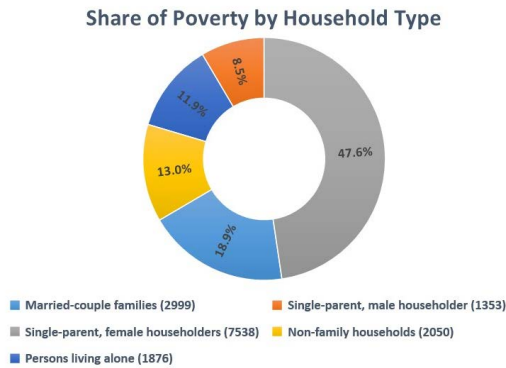
Women and girls make up just over half of Lancaster City. In alignment with state, and national trends, women are more likely to live in poverty than men, across age, race, education, and marital status.^{11,12} Women in Lancaster are slightly more likely to live in poverty (29.7%) than men (27.2%)⁵

While this difference in rate is fairly small, adding children into the equation expands the gap significantly, especially among the unmarried. 48% of all individuals living in poverty are in single-mother households.

Age

Half of Lancaster City is under the age of 30, while 31% of residents are younger than 25.¹⁴ Young people, particularly minors, are disproportionately poor - under-18s are 17%¹⁴ of the city’s population, but make up 40.9%⁵ of those living in poverty - and disproportionately affected by poverty.

Figure 3 - Poverty by Household Type¹³



ACS 2010-14 5-YR Estimates - B17021

It is well-established that the adverse experiences of childhood poverty have consequences that extend into adulthood and across generations, making the resource and education disparities experienced by our children particularly dire.¹⁵ Much of this is by way of what is called “toxic stress,” which can “disrupt the development of brain architecture and other organ systems, and increase the risk for stress-related disease and cognitive impairment.”¹⁶ Children of color experience poverty in higher proportions than white children and are more likely, therefore, to experience toxic stress.

However, 89% of School District of Lancaster students are economically disadvantaged,¹⁷ that is, living in households earning less than 185% of the poverty line for their family size, which is the cutoff for free or reduced-price lunch.

Poverty is also disproportionately common among young adults in Lancaster; whereas adults under 25 make up 21.5% of working-age (18-64) adults,¹⁸ they make up a slightly higher proportion of working-age adults in poverty at 26.5%.¹⁹

“We’re young so we don’t have much of a say, but we should because we are the future.”
-community conversations

Employment

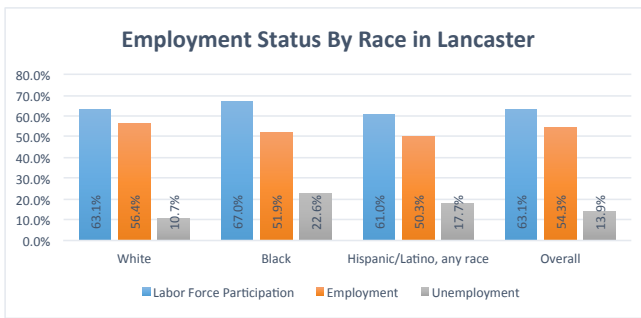
Full-time employment is another strong predictor of whether a person lives in poverty. Among the 10,222 adults living below the poverty level, only 6% of those who reported working full-time, year-round live in poverty.²⁰ It is equally telling that only 8.7% of families where the head-of-household worked full-time live below the poverty line.²¹

Figure 4 - Poverty Rate By Age in Lancaster City⁵

Age	Poverty Rate	Number in Poverty
Under 18	40.9%	6046
18-64	25.3%	8950
65+	15.4%	820

ACS 2010-14 5-YR Estimates - S1701

Figure 5 - Employment Status by Race²²



ACS 2010-14 5-YR Estimates - S2301

According to Census data, 13.9% of Lancaster’s labor force is unemployed, that is, not working but looking for work. Among the poor, 28.9% are unemployed.²² Despite similar rates of labor force participation and employment, unemployment rates are higher among African-Americans (22.6%) and Latinos (17.7%) have significantly higher rates of unemployment than whites (10.7%). This disparity contributes significantly to differences in poverty rates and median incomes.

However, employment does not guarantee self-sufficiency. 38.7%²² of Lancaster’s poor are employed part-time or for part of the year and still live in poverty.²⁰ Especially if a worker is supporting a family, minimum-wage or part-time employment is often grossly insufficient to make ends meet. One worker supporting a family of four above the poverty line needs to work 40 hours per week, at an hourly wage of at least \$11.70/hr.²³ This family would still be thousands of dollars away from self-sufficiency.²⁴

Educational Attainment

Education has long been touted as the solution to inequality. It is prominently featured in the anti-poverty plans of the foremost institutions,²⁵ and though any single-solution approach to poverty is

rightly criticized, education is not to be dismissed.

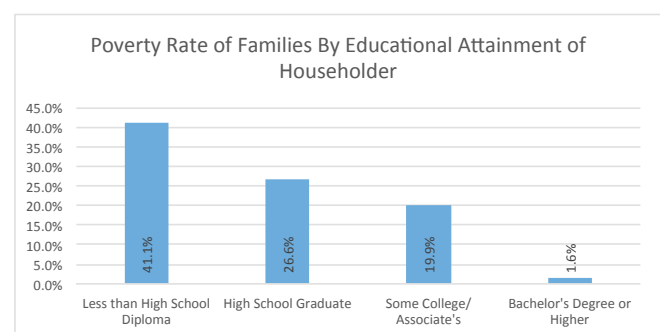
Less than 5% of all Lancaster adults with a Bachelor’s degree equivalent or higher live in poverty.⁵ Less than 2% of all families where the householder has such a degree live in poverty.²¹ The data, shown in the figure below, makes it clear that as education level rises, poverty drops.

When discussing intergenerational poverty, education is unavoidable. Research has shown that early indicators can predict success throughout a child’s academic career,^{26,27} and that these early indicators are linked to socioeconomic status.²⁸

Education remains a challenge for our community and for the nation. The Public Policy Institute at Georgetown University estimates that by 2025, less than a decade from now, 65% of jobs will require some kind of post-secondary education.²⁹ 76.3% of Lancasterians over age 25 lack a post-secondary credential of any kind.³⁰ While trends among the 18-24 population indicate an increase in educational attainment, a significant gap remains, especially, by way of ensuring that current heads of household have the skills to command a living-wage job.

On the whole, women in Lancaster city are better educated than men, with 26.5% and 20.5% having a

Figure 6 - Poverty by Educational Attainment²¹



ACS 2010-14 5-YR Estimates - S1702

postsecondary credential, respectively, though women's median income remains lower and poverty rate remains higher for a variety of reasons. Educational disparities by race are clear, for example 88% of African American over-25s lack a postsecondary credential, as compared with 64% of white over-25s.³¹ Roughly 24% of Latinos of any race have educational attainment beyond a high school diploma or equivalency, compared with 53% of whites.³²

Homeownership

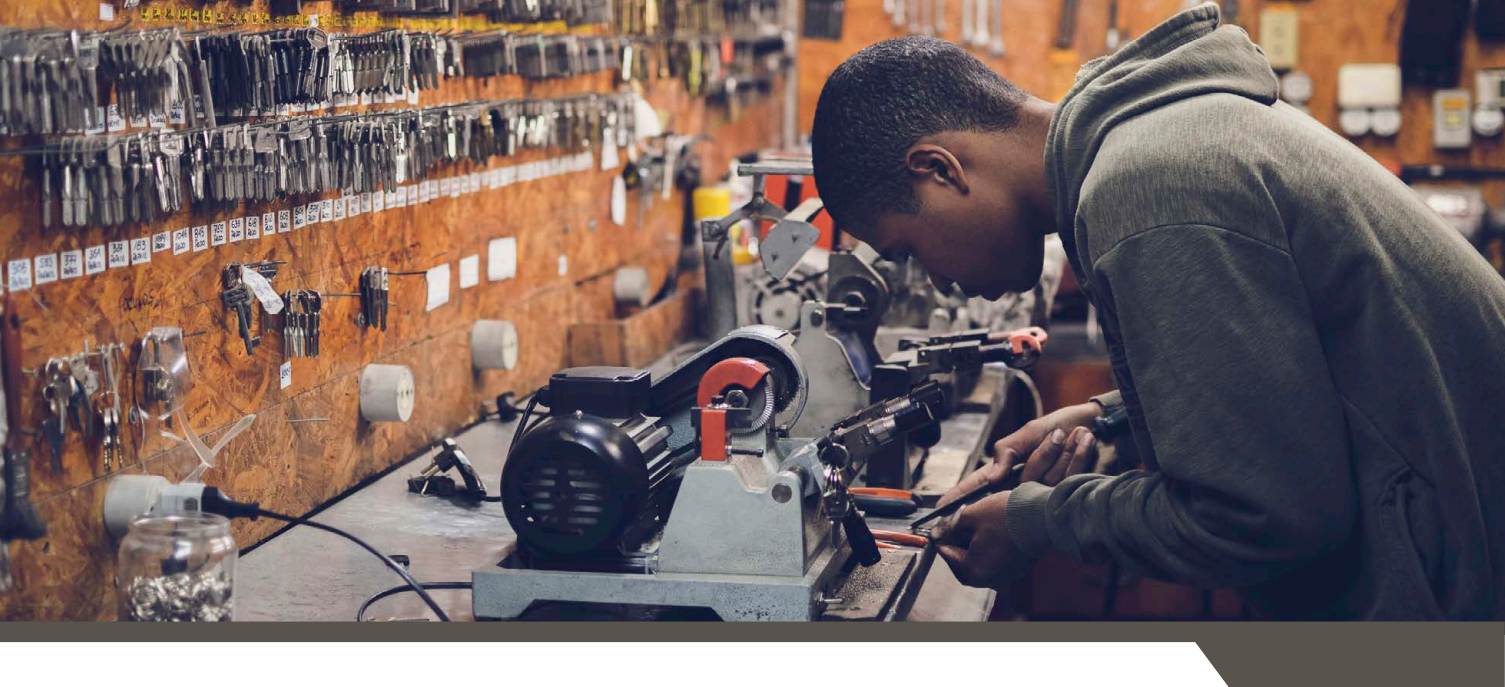
Since 2000, the homeownership rate for City of Lancaster has decreased from 46.5%³³ to 42.8%³⁴, but this has not been an equitable shift. While homeownership among African Americans has remained generally stable over the past 15 years, it has dropped from 32.5% to 25.3% for Latinos over the same period.

Homeowners tend to be relatively better off, with the median income for renters (\$22,878) being \$30,880 less per year than that for homeowners (\$53,758).³⁵ The income gap between renters and homeowners is increasing, being \$11,000 dollars less in the year 2000.³⁶

While Lancaster's poorest census tracts have a smaller gap between median incomes for renters and homeowners, this increased equity is indicative of a weaker economic outlook with these census tracts having lower median incomes, both generally and for renter-occupied households.³⁶

Despite increasing doubt of the value of homeownership since the housing crash, it remains a path to long-term gains. According to the Joint Center for Housing Studies at Harvard University, homeownership "continues to represent an important opportunity for individuals and

families of limited means to accumulate wealth."³⁷ Homeownership is also associated with less tangible benefits, such as increases in neighborhood social cohesion.³⁸



OUR RESEARCH

The Mayor's Commission to Combat Poverty is, among other things, a fact-finding body. Our work from November 2015 has required a variety of research efforts, primarily carried out by the Research Associate and student volunteers from Franklin & Marshall College and Millersville University.

Special credit is due to the F&M Works program and Millersville University's Center for Public Scholarship & Social Change for their significant contributions to our research efforts throughout 2016. More on this can be found in the "Acknowledgments" section.

Much of the research conducted was archival, e.g., pulling out Census Data from the American Community Survey to update statistics on Lancaster City and County, or reading white papers and academic journals to identify best practices. As addressed elsewhere in this report, fact-finding was also conducted by way of public hearings with

testimony by local and national experts. Several other specific projects were undertaken over the course of the past 14 months, and descriptions of two of those projects, and the Commission's Community Conversations, can be found below. Inquiries on other projects completed or ongoing can be directed to the Research Associate.

Food Access Survey

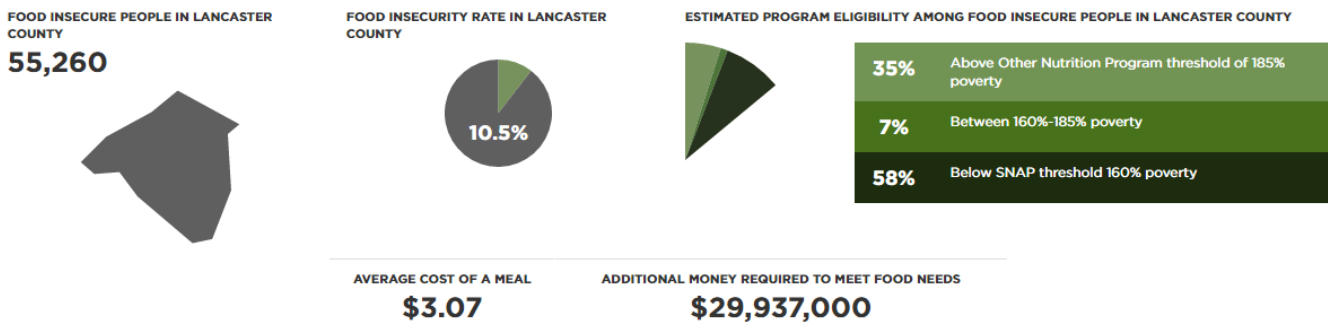
The Food Access Survey was a 16-question instrument based on the USDA's Food Security Questionnaire completed by 207 Lancaster City residents in both English and Spanish. It was focused in the Cabbage Hill neighborhood, as well as the South Duke and South Queen corridors. It was also conducted as a site survey at the Council of Churches Food Bank on North Queen St., and at Commission to Combat Poverty's February hearing. It was administered by student volunteers, with 144

of the survey's 207 responses coming from door-to-door respondents, 53 coming from the food bank site, and 10 coming from the hearing site.

The survey also included questions from a Lancaster General Health Community assessment alongside demographic questions. The survey was designed to dive deeper on food insecurity and illustrate a way that gaps in hunger data could be filled. Feeding America, which maintains food insecurity data for Lancaster County (found below), and for PA's 16th Congressional District, does not drill down to the city level.

low food security, with another 30% indicating low food security. The survey's sample was non-scientific and non-random, with a clear bias toward those living in poverty or in low-income neighborhoods. Therefore it should not be assumed to indicate food insecurity rates in the City of Lancaster, but serve as an example of how more detailed survey work can map the food access, store choice, and food insecurity of Lancaster's Southeast and Southwest quadrants, hitherto unexplored in a quantifiable fashion.

Figure 7 - Food Insecurity in Lancaster County



At the time of writing, this data was also not available from the Hunger Free Lancaster coalition.

Among other items, the Food Access Survey found that cost, distance, and time most stood as barriers to “accessing quality food” with cost predictably ranking first by a wide margin among survey respondents. Despite the relative proximity to all respondents of a smaller grocery store on Queen St., a supercenter store on Lincoln Highway was equally likely to be a respondent’s store of choice for groceries. This finding is in line with previous findings by the USDA’s Economic Research Service.³⁹

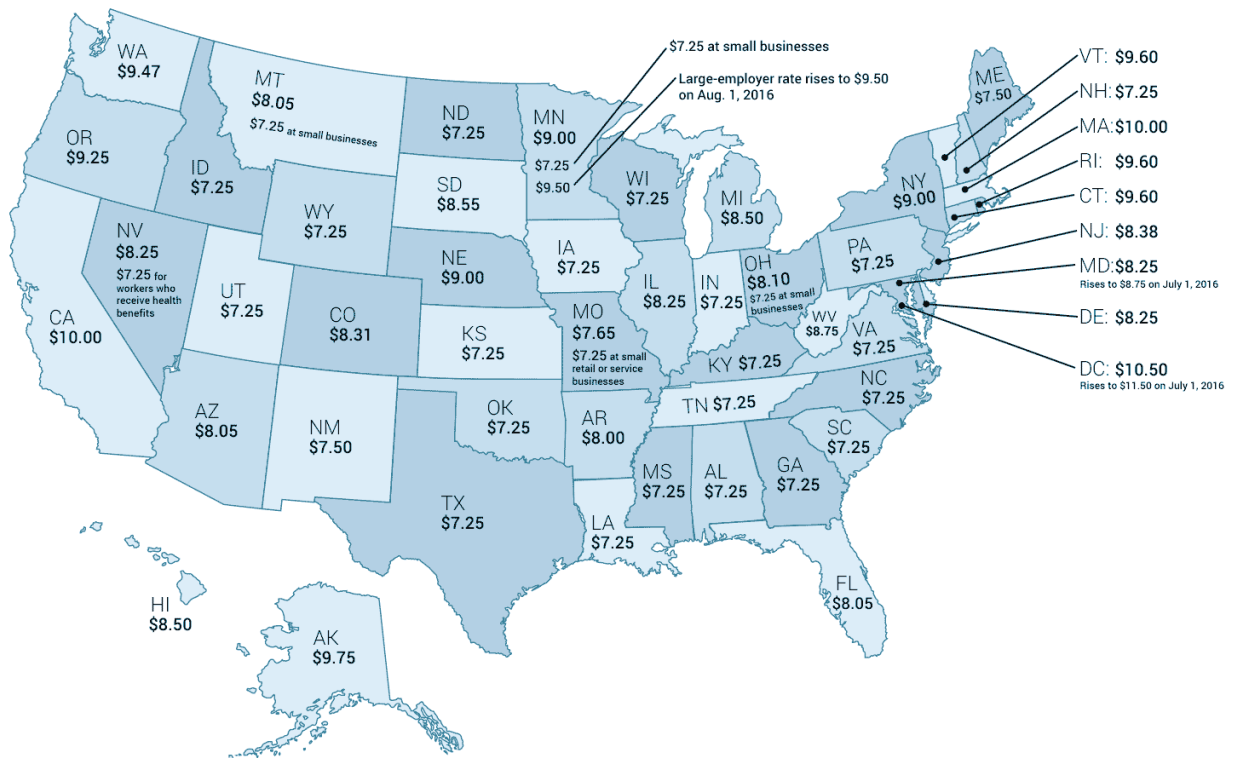
Finally, 25% of respondents to the Food Security Questionnaire portion of the survey indicated very

Minimum Wage Project

Commission interns engaged in a survey of available information on the minimum wage, looking at several elements of relevant research, including:

- Comparative minimum wage levels in mid-Atlantic states
- The effects of moderate minimum wage increases on employment
- An evaluation of minimum wage increase campaigns, and the effects of large projected wage floor increases on employment.

Figure 8 - Minimum Wage by State, 2016



Their general finding was in line with recent findings that moderate increases in the minimum wage do not necessarily increase displacement and that “the weight of [the] evidence points to little or no employment response to modest increases in the minimum wage.”⁴⁰ Similarly, a moderate wage increase “could have a small stimulative effect on the economy”⁴¹ but may not, all told, be the most efficient policy change in reducing poverty due to a variety of factors.

However, increased wages show a clear association with positive health and economic outcomes. Indeed, a paper from Cornell University’s Industrial & Labor Relations School found that a higher minimum wage increases the effectiveness of the Earned Income Tax Credit as a work-incentive, increasing employment and income for single

mothers and very poor families with children.^{42,43} Another pair of papers, from the University of Iowa and Emory University link an increased minimum wage with small but significant declines in low birth weight and infant mortality.^{44,45}

As for large minimum wage increases, such as the \$15/hr minimum wage proposed by many living wage campaigns nationwide, conclusive research is generally lacking, due to the fact that no state or city currently has such a wage at the time of writing. Seattle, with its tiered increase to a \$15/hr wage floor by 2017, has been used as something of a test case. A study on the Seattle Minimum Wage Ordinance by the University of Washington is worth reading, and has found mixed results for low-skilled workers, a modest increase in dollars earned, but a 1% “decreased likelihood of being employed

in Seattle relative to other parts of the state of Washington,” in the context of an overall increase in their employment likelihood.⁴⁶

Given Lancaster’s lower cost of living, an increase to \$15 an hour would be uncharted economic territory. A staggered wage floor increase to \$15/hr by, say, 2020, starting in 2017, would represent a 107% increase in the nominal dollar value of the minimum wage. This would represent, on average, a nominal dollar value increase of 35.6% per year.

For perspective, the Pennsylvania Department of Labor and Industry reported that “The General Assembly of Pennsylvania, in 2006, via Act 2006-112, amended the Minimum Wage Act and raised the state’s minimum wage from \$5.15 an hour to \$6.25 on Jan. 1, 2007, and to \$7.15 on July 1, 2007. The minimum wage had last been raised in 1997. Effective July 24, 2009, the federal minimum wage increased from \$6.55 an hour to \$7.25.”⁴⁷ This is a 40.8% increase over 3 years, or a 13.6% increase in nominal dollar value per year. According to inflation data based on the Consumer Price Index, \$7.25 in 2009 is worth about \$6.81 in 2005 dollars, and so represents a 32% increase in actual purchasing power.

A minimum wage raised to a more moderate amount, at the \$10.10 level commonly proposed - incidentally, 102% of the living wage for Lancaster County²⁴ - is estimated to affect 57000 county residents.⁴⁸ Nationally, the Congressional Budget Office estimated in 2014 that an increase to \$10.10 by 2016 would:

- reduce total employment by about 500,000 workers, or 0.3 percent, as a central estimate
- increase net real income by \$5 billion for

families currently living below the poverty line

- increase net real income by \$12 billion for families living between 100 and 300% of the poverty line
- increase net real income by \$2 billion for families living between 300 and 600% of the poverty line
- decrease net real income by \$17 billion for families living above 600% of the poverty line
- increase overall real income by \$2 billion
- decrease, by 900,000, the number of people living below the poverty line⁴⁹

Community Conversations

Good research on poverty is not always limited to the quantitative. Communicating with those actually living with the barriers to success described in this report is essential.

The community conversations were therefore designed to be small-group conversations among community members, Commission and Workgroup Members, and staff. They were productive, not only in illuminating problems of which the Commission may not have been aware, but also in allowing Lancaster residents to have a hand in crafting solutions that will affect their lives.

These conversations were held in groups of 20 or fewer, at sites all over the city. Having held conversations through the end of the Commission’s term, we met with over 100 Lancaster residents. We addressed several issues, such as hunger, workforce, re-entry, and the housing environment in Lancaster City. Community conversations were held

with residents, in conjunction with the following organizations:

- Bright Side Baptist Church
- Tec Centro
- The Mix at Arbor Place
- The Re-entry Management Organization
- Atollo/Children Deserve a Chance Foundation
- Exit Lancaster
- Washington Elementary Community School

A Note on “Poverty”

From the title through to the very end of the report, the word “poverty” and phrases like “living in poverty” are quite common in this document, and questions have been raised about what exactly that means.

For our purposes, “poverty” refers to the condition of living with an income less than the Federal Poverty Thresholds for one’s household size. It is not to be understood as meaning anything other than this. From the University of Wisconsin:

Individuals or families are “poor” if their annual pretax cash income falls below a dollar amount, or poverty threshold, that the Census Bureau determines using a federal measure of poverty that is recalculated each year.⁵⁰

These thresholds were developed by economist and researcher Mollie Orshansky in 1963, during her time at the Social Security Administration. She based her thresholds on estimates of the costs

of an adequate diet for a given number of adults and children, and extrapolated from there.⁵¹ The thresholds are updated annually based on the Consumer Price Index.

There has been no shortage of research over the past 20 years on the inadequacy of the measure to tell us how families actually live. The Supplemental Poverty Measure, developed by the Census Bureau over a ten-year period, attempts to address many of the levied criticisms. Its calculations go into much more detail about elements of household income and expenditures, namely, “cash income plus non-cash transfers (such as food stamps and housing subsidies) and refundable tax credits minus income and payroll taxes, medical out-of-pocket expenses, and work expenses (includes childcare expenses).”⁵² This is measured against the “33rd percentile of expenditures on food, clothing, shelter, and utilities,” that is, the dollar amount where one-third of American households spend less and two-thirds spend more in these areas each year.

The Official Poverty Measure, by contrast, measures pre-tax cash income against the thresholds mentioned earlier. While it is generally agreed that the Supplemental Poverty Measure,⁵³ and other measures of poverty based on consumption,^{54,55} offer a more accurate picture of households,⁵⁶ it must be understood that the two standards measure different things, not just materially, but conceptually.

The SPM is a measure of relative poverty, a household’s means versus necessary expenditures relative to all other America households. The OPM asks simply “do you earn enough cash to make ends meet?” where the distance between ends is a fixed number. For this reason, the Official Poverty Measure is an “absolute” measure of poverty. In this report, we take the Official Poverty Measure

for several reasons, chief among them being that the most data is available about this measure. The SPM, while made available at the national and regional levels, is not applied to more granular geographic areas unless a specific project is undertaken. The Commission’s research team is not aware of any such analysis for Lancaster County or City, but strongly recommends such a development.

Further, living above the poverty line is not the same thing as being self-sufficient. Many self-sufficiency standards are offered by universities and institutions, such as the Center for Women’s Welfare at the University of Washington.⁵⁷ These standards total the cost of all expenditures by family size and composition, and indicate the wage or income amount necessary to cover them.

The most current such standard is that maintained by the Massachusetts Institute of Technology. Their analysis estimates that an annual income between \$45,000 and \$69,000 is required for a family of four to be self-sufficient, that is, to cover all costs without government assistance.²⁴ Compare that to the Federal Poverty Thresholds, which indicate that a family of four is no longer “poor” at 25,000 dollars of annual income. Clearly, a large gap separates poverty from self-sufficiency. It is for this reason that many public benefits extend to households at 160% (SNAP), 185% (free or reduced price lunch), or 300% (Childcare Works) of the poverty line.

Definitions

Several other terms and phrases find use throughout this document that we thought it important to clarify. They are as follows:

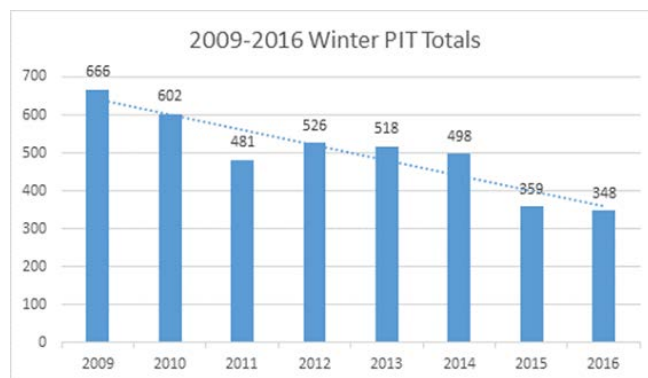
Functional zero - as regards homelessness, a community reaches functional zero when the system can rapidly rehouse all those experiencing

homelessness within 30 days. There will always be people experiencing homelessness, due to a number of factors, so the goal becomes to have structures in place to help those who become homeless, immediately.

The Department of Housing and Urban Development defines categories of homelessness, including veteran homelessness, chronic homelessness, family homelessness, and individual homelessness. Lancaster County currently has the capacity recognized as “functional zero” for both veteran and chronic homelessness.

Overall homelessness has declined significantly in the county, as this figure from the Lancaster County Coalition to End Homelessness shows.

Figure 9 - Point-in-time Counts, Homelessness



Living wage - a living wage refers to either an hourly wage or a total annual income which is sufficient to support a worker and their family. Distinct from the minimum wage, which is a legal wage floor, a living wage will vary by the family size and household structure of the person working. A person being paid a living wage makes enough to pay for their family’s expenses, generally.

“Living-wage employment” can also refer to a standard of employment where wages are significantly above poverty wages, but may not break the threshold of self-sufficiency for larger family sizes. For example, a company paying \$20 dollars an hour (full-time) may be said to be paying a living wage, as this is twice the poverty wage for a householder supporting two or three other people. However, it does not meet the self-sufficiency standard for a family of four, which has its floor at \$45,000²⁴

Recidivism - “Recidivism” refers “to a person’s relapse into criminal behavior, often after the person receives sanctions or undergoes intervention for a previous crime. Recidivism is measured by criminal acts that resulted in rearrest, reconviction or return to prison with or without a new sentence during a three-year period following the prisoner’s release,” according to the National Institute of Justice.⁵⁸

Labor Force - the labor force of a given geographic area, such as a city or county, is the total population of persons both working and those who are not, but are looking for work (**the unemployed**). The **labor force participation rate** is the number of people who are either employed or unemployed, divided by the total population over 16 years of age. The **unemployment rate** is the number of people currently unemployed divided by the total labor force, not the total population.⁵⁹

Cliff Effect - The “cliff effect” or “benefits cliff,” is the situation where a family receiving public assistance (typically childcare subsidies) increases their income, but loses a greater value of assistance than their earnings increase. This effect is thought to discourage families, particularly single mother-households, from moving toward self-sufficiency.

“White” - Though it is often mentioned in the text, where this report refers and has referred to “whites,” or “white people,” it is to be understood as those persons who identify as white but do not claim any Hispanic/Latino identity.

Benefit Corporations - “Benefit Corporations,” for our purposes, are for-profit entities that measure and manage their social and environmental performance with the same rigor as financial performance. These companies may legally establish themselves as Benefit Corporations in the Commonwealth of Pennsylvania, achieve “B Corp” status, a third-party certification for companies meeting rigorous standards of social and environmental performance, accountability and transparency, or measure and improve their social and environmental performance without either official designation.

Neighborhood Group - For the purposes of this report, “neighborhood groups” refers to community watches, civic organizations and other groups that mobilize community members to achieve resident-defined goals in the South East and South West, unless it is otherwise specified.

THE RECOMMENDATIONS

“I think what we have to wrestle with is what is going to lift the families out of poverty? I think there’s a fork in the road and we have to choose which is going to eliminate poverty and which will manage it.”

-Commission Meeting

Over the year of hearings, research, and community conversations, the Commissioners noted a theme emerging: almost all issues could be traced back to employment. Whether it was hunger, housing, childcare, or transportation, each of the barriers that low-income families in Lancaster face are either impediments to accessing gainful, living-wage employment, or consequences of the lack thereof.

The commissioners therefore decided to focus their efforts on employment, and workforce efforts generally. While many of the recommendations may not seem directly connected to workforce development, they all support one or more of the following goals:

- Ensuring that strategic skills training and education are available, streamlined, and affordable, especially to low-income heads of household, so that they can command living-wage employment
- Securing healthy homes for children and families, and educational and social environments that are conducive to future success, which includes sustainable, living-wage employment in their own time
- Empowering families by providing them with supports that encourage work and do not discourage family life

The Commission's theory of change is that connecting heads of households to living wage employment is the most important thing that we can do to break the cycle of intergenerational poverty.

Research shows that the income and education levels of parents are strong predictors of success in their children. A Pew Charitable Trust report on economic mobility found that "the expected family income of children raised in families at the 90th income percentile is about three times that of children raised at the 10th percentile,"⁶⁰ and a study of longitudinal data found that the educational level of an 8-year old's parents significantly predicted that child's educational and occupational success at age 48.⁶¹

Given the median family size in Lancaster City, every parent connected to living-wage employment brings two to three⁶² other people with them out of poverty, lessening toxic stress⁶³ and modeling "achievement-related behaviors."⁶¹ They, in turn, create communities that support success and healthy development. Creating thriving adults in the next generation means investing in their parents and neighborhoods now. All the recommendations should be viewed with this theory of change in mind.

The Commission believes strongly in the need for personal responsibility in decision-making. We also believe that we, as a community, are responsible for one another. We cannot deny the history that brought us to this point, we cannot ignore the ways in which concentrated poverty is self-perpetuating, and we cannot shirk responsibility for systemic problems that discourage success, especially in those systems designed explicitly to help low-income people.

In the sections that follow, the reader will find the Commission's recommendations to combat poverty in Lancaster. Each recommendation will be associated with the goal it was crafted to achieve, and data that supports our belief in its efficacy. It is important that the reader understand that these goals do not seek to correct all the world's ills, but to offer some direction as to how way we can start to clear the roadblocks that help trap people in poverty.

The recommendations are broken up into four focus areas: **Workforce, Education, Housing, and Community**. Under each of these focus areas are a few general strategies, divided further into several action items and next steps in combating poverty. Some of them are immediate, some aspirational. We believe that all of them are necessary.

Our overarching goal is a 50% reduction in the number of people living below the poverty line over the next 15 years. As individual commissioners, we were of many minds as to how to best achieve this goal, but together we offer you the following strategies on which we, the data, and the community members we spoke with agreed.

WORKFORCE

<p>GOAL: Ensure that adults living in poverty are connected to employment opportunities and living wage jobs that allow them to reach their full potential and create a stronger, foundational springboard for their families and their community.</p>	<p>OUTCOME: Through higher-wage, full time employment, at least 3000 adults will lift themselves and their families out of poverty by 2032, cutting poverty by at least 50%.</p>	<p>FOCUS: Unemployed or underemployed adults, with specific attention to heads of household facing barriers such as lack of secondary or post-secondary qualifications, literacy challenges, or re-entry barriers.</p>
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	Year 1	Year 5	Year 10	Year 15
Living Wage Employment	50 families connected	700 families connected	1700 families connected	3000 families connected

A pathway to success for an entire community - a dozen neighborhoods, thousands of people, requires the development of both workforce and work environment. Across the state, employers struggle to fill jobs. For example, a report published in Fall of 2016, indicates that 62% of firms in Pennsylvania struggled to fill positions in skilled crafts labor, with about 40% of such firms indicating that they were struggling to fill salaried positions.⁶⁴ Large firms in Lancaster County echo these complaints, indicating that they can't find or keep employees with the necessary hard and soft skills.

At the same time, the manufacturing jobs that

provided a path to the middle class have declined locally and nationally, and recovery from the Recession of the late 2000s has been uneven. In community conversations, residents indicated a variety of barriers and discouragements to gainful employment, including distance from jobs, low wages, the need to care for children and other family members, the loss of family-sustaining benefits, and in some cases, institutional discrimination.

Lancaster City has 9,470 adults¹⁹ living below the poverty line, very few of whom are engaged in full-time employment. Gaining such employment

requires hurdling significant barriers. Language is a common barrier to employment and job-seeking in Lancaster, with 10% of all city households designated as “limited English speaking” households. Among workers 16 years and older in the City, 3339 spoke English less than very well,⁶⁵ and may experience this as a barrier to advancement.

The Commissioners were particularly concerned with those who possessed post-secondary qualifications, but faced advancement barriers due to language or, having been educated abroad, were unable to find recognition of their credentials.⁶⁵

Re-entry barriers are common: some 6000 adults are released from the Lancaster County Prison every year. While the Commission is not aware of any estimates for Lancaster as a community, as many as one in three Americans have a criminal record.^{66,67} Jobs, and a stable place in the community help to lower recidivism rates and give people an opportunity to put their lives back on course for success.^{68,69}

The need to bridge the gap between jobs and residents is apparent. Higher earned income and/or socioeconomic status, the kind that comes with living wage employment, is linked to better health outcomes, life expectancy, and day-to-day happiness, to a point.^{70,71,72} Poverty is linked to increased violent crime victimization,^{73,74} teen pregnancy,^{75,76} and toxic stress that sets children on a trajectory “for worse lifetime health, lower educational achievement, poorer employment opportunities, and greater risk of involvement in the criminal justice system.”^{77,78}

The costs of poverty, unemployment, and underemployment for both our community and individuals are greater than we should tolerate.

The advantages of our strategy are significant. While connecting a person to a family-sustaining wage may be challenging, every head of household so engaged brings two to three other people out of poverty with them, who enjoy a variety of benefits in self-sufficiency.

Furthermore, they require less in public assistance and have more to spend on goods and services, boosting the local economy. Adults who only need to work a single, full time job to support their families also have more time to spend with those families and to engage in civic life in their communities, reducing the need for nonprofit programs to fill the void.

Connecting families to living-wage employment is at the core of what the Mayor’s Commission to Combat Poverty seeks to do: increase economic opportunity, stability, and ownership in the communities where they are most lacking and, indeed, have been actively disrupted. The workforce strategies that follow aim to do this in two ways: 1) by providing residents with the skills, education, connections and pathways to access a sustaining wage for them and their families and 2) evolving our system to one that encourages and supports work, bolstered by a sustainable employer culture that values accountability to the community and employees as highly as it does profit.

“When adults have an opportunity to obtain employment as a result of achieving high school equivalency, they can begin to move off of public support.”

- April 22, 2016

WORKFORCE STRATEGIES & ACTION ITEMS

Workforce Strategy 1: equip heads of household with the necessary skills and training to attain and sustain higher wage and living-wage employment

- Work beyond the restrictions of Workforce Development Board funding to replicate evidence-based models like those of the Democracy Collaborative i.e. employee-owned businesses, specialized employee placement, on-site training, and wraparound support services for employees beyond job placement - local examples include the Lancaster Food Company, The Stroopie Company, and Revolution Lancaster
- Conduct gap analysis of the workforce system in Lancaster County indicating usage levels, demographics, outcomes, funding streams, capacity and priority given to those in poverty
- Work within a collective impact approach to augment the county workforce system to focus on those most in need who are also most ready to succeed
- Balance efforts between industry needs and person-centered approaches to gain alignment with industry that defines the workforce demands both current and future while at the same time aligning with individuals' passions and aptitudes for sustainability and retention
- Advocate with State Department of Labor and Department of Public Welfare to remove regulatory burdens to improve the system

- Increase access to short-term skill training and literacy programs and align workforce/post-secondary offerings with workforce demands and trends
- Create an immersive English language class and prioritization in existing English language classes for residents from other countries with postsecondary credentials to get them connected to living wage employment as quickly as possible and advocate for statewide fast-track re-certification in as many professions as possible

Workforce Strategy 2: align legal structures, employer culture, and support for new small businesses to create a real path to self-sufficiency

- Advocate for smoothly-tiered, appropriately funded childcare subsidy and alignment of all government assistance programs to eliminate cliff effect and incentivize work
- Advocate for modified subsidies that tier down support for multiple children and incentivize smaller family size
- Create an education campaign and certification to encourage employers to pursue sustainable wage and hiring practices and community responsibility, setting a standard for local businesses
- Reach parity in business ownership by women and people of color, who are statistically more likely to hire other women and people of color within their businesses

FINDINGS

Workforce Strategy 1: target heads of household for skills and training

NIMBLE APPROACH TO WORKFORCE

Analysis of American Community Survey data reveals that the median household size for Lancaster City families in poverty is about 4.13. An approach that focuses on family households provides a strong path for reducing poverty in Lancaster by up to half by connecting 3000 such families with the benefits of living wage employment over the next 10-15 years. The Commission's target accounts for attrition and variance in family size. Implicit in this is widespread strategic skills training for the population to be employed.

The Commission acknowledges that traditional workforce efforts exist in Lancaster, and have met with limited success considering recent economic trends. However, over the course to the Commission's analysis of best practices nationwide, we became convinced that non-traditional approaches to workforce development can find success.

The City of Richmond, Virginia, after conducting an investigation into that community's poverty and workforce, in their own Anti-Poverty Commission, developed workforce infrastructure as a part of the Office of Community Wealth-Building. Confronting an "employment environment [that] can be especially challenging for adults who have been historically disconnected from the workplace," Richmond felt it was important to create an entity with the "agility... to meet workforce demands."⁷⁹

In 2011, Richmond launched the Center for Workforce Innovation, a locally-funded workforce entity that engages in strategic partnerships to provide workforce training and employment networking for Richmond residents. The Center's greatest advantage is that it has its own budget, and therefore its activities and connectivity are less constricted by federal and state funding requirements. To date, the Center has assisted over 600 residents in securing employment, and is accelerating and expanding its intervention, placing 176 employees in fiscal-year 2015.⁸⁰

Richmond's Building Lives to Independence and Self-Sufficiency (BLISS) program enhances Richmond's workforce efforts by providing targeted work and family supports to families on the path to self-sufficiency. The program provides wraparound services to families in transition like financial education, transportation support, childcare assistance, GED and ESL program enrollment, and training in skilled crafts.⁸⁰

The Commission feels that creating an alternatively-funded workforce development agency, could have serious advantages for Lancaster. The goal is not to replace traditional workforce development, but to create an agency or program which can unify workforce offerings in our community, taking advantage of public, non-profit, private, and faith-based initiatives, and create broad and coherent messaging about what work supports are available.

The creation of a Community Development Corporation (CDC) for the county as a whole, with direct connections to housing and community efforts, could fill this role without being subject to the siloing and divisions that disconnect traditional workforce development from the "services some residents require to be able to go to work or participate in training programs - such as child care,

transportation, or health care.⁸¹ Key elements would include:

- Warm hand-off capability with agencies providing the supports that help families achieve self-sufficiency
- A clear, no-cost, point of entry accessible to Lancaster City's low-income communities
- Person-centered connection between aptitudes and job opportunities (Navigation model)
- Deep, agile, real-time partnership with businesses hit especially hard by Baby Boomer retirements, both employees and business owners
- Leadership that includes and is guided by members of impoverished neighborhoods
- Services that continue beyond job placement, regardless of income level (Navigation model)
- Intentional, strategic connection between affordable housing development, economic development at the neighborhood level and workforce development
- Focus connectivity of services on strategic priorities as opposed to traditional, "first come, first served" system

The Commission also recommends a program, as part of this entity, which targets hard-to-hire workers and their families on the model of Richmond's BLISS program, with the aim of connecting 500 families with work barriers to living-wage employment over the next 10 years.

The Commission recommends an initial strategic focus on single-mother households. A recent report from Franklin & Marshall College notes that there are "about 1000 single, working women raising families and living in poverty."⁸² Connecting them to full-time employment at sustainable wages would reduce poverty in Lancaster City by 20 to 25%.

SKILLS, LITERACY & LANGUAGE SUPPORT

At the Commission's Education & Training hearing, and in conversations with the public, the Commissioners were engaged on the prevalence of literacy as a barrier to success in our community. 54,319 Lancaster County adults are in the lowest literacy level, that is, they cannot read and write English well enough to fill out a job application.⁸³ Given this information, and knowing that limited English proficiency is a common barrier in our community, the Commission recommends an expansion of literacy, language, and basic skills programs as well as better connectivity between all existing programs. With expansion, these programs could also benefit some the approximately 500 inmates released from Lancaster County Prison each month, providing skills and lowering recidivism.

Workforce Strategy 2: create real path to self-sufficiency through policy, employer, and community alignment

ELIMINATE THE "CLIFF EFFECT"

One of the biggest challenges to reaching adults not currently in the labor force is skepticism about real potential for advancement. Whether that skepticism comes from lack of perceived job opportunities, previous struggles in the labor market, low wages, or fear that our benefits system will punish them for

“My concern is we are continuing to traumatize our families who are already in need, and we’re telling them, although you are saving your money and doing what you need to do, you still don’t make enough to provide for your family.”

- public hearing testimony

succeeding, it must be overcome if we are to make progress in reducing poverty.

The “cliff effect” or the “benefits cliff” is one salient example of how our system discourages work and advancement, particularly for families with children. Childcare is often the largest expense, and therefore the largest subsidy for families on government assistance. Due to the high cost of quality childcare - estimated at \$7-8,000 annually for one child - families rely on the childcare subsidy to be able to work. The abrupt loss of this subsidy when crossing an income threshold can leave a family worse off for making a few dollars more an hour.^{24,84,85}

While our state legislature has recently made progress on this issue by increasing the eligibility limit for the Childcare Works Subsidy to 300% of the federal poverty guidelines, this change did not come with additional funding support for the subsidy. This allows for families to retain the subsidy longer, and includes a tiered phasing out of the subsidy,⁸⁶ which is good, but the Commission fears that without new funding to match these changes, those seeking subsidized childcare will face longer waiting lists as resources are stretched. Therefore, we

strongly recommend a smoothly-tiered system that encourages work and progress with appropriate funding for all public subsidies, regarding childcare as a priority.

A “TRIPLE-BOTTOM-LINE” CULTURE

Legislative policy is but one way to create a real path to self-sufficiency. Ultimately, a system is made of its participants. Models such as the social enterprise and the “benefit corporation” or “B-corp” model have charted pathways for how businesses can engage environmental sustainability, investment in employees, and profit all at the same time.^{87,88} This is often characterized as a “triple bottom line” - environmental, social, financial - approach to business. One such example is Wash Cycle Laundry in Philadelphia, a bike-delivery laundry service that hires workers coming from incarceration, drug addiction, homelessness, and other difficult situations, and provides them with quality jobs. Wash Cycle,⁸⁹ and other triple bottom line companies like Lancaster’s Two Dudes Painting Company, invest in their employees with living wages, health benefits, and paid sick leave,⁸⁸ and reap benefits in the form of reduced turnover and more productive employees, among others.^{90,91}

The Commissioners are bolstered by examples like these which prove that profit and community responsibility need not be mutually exclusive. Further, we feel that reaching households detached from the labor force involves creating an employer culture, throughout Lancaster County, that lets would-be employees know that the company will invest in their success, and in the communities where they live. We recommend that a public relations campaign be established to inform communities and employers of the advantages of practices like:

- Investing in economic development in low-income communities
- Making real progress toward reducing their environmental footprint
- Hiring workers with barriers to employment
- Providing on-site childcare, or employee transportation
- Investing in workers by paying a living wage

We also believe that employers already engaged in these practices should be rewarded and encouraged, and recommend a certification be created to make the Lancaster community aware of the companies that are engaged and responsible. Locally, we commend efforts like the Lancaster Entrepreneurship Coalition, a consortium of all business development and economic development agencies in Lancaster convened by Lancaster City Alliance and ASSETS. This coalition is employing a collective impact approach and seeking to grow the largest number of equitable and ethical businesses per capita in the country. These efforts can help to set a new standard for Lancaster County, and help convince a waiting workforce that employment is the right choice for their families.

“There’s a lot of research that shows that people who pay their employees well, actually, their businesses perform better.”
-public hearing testimony

Special Note

Transportation barriers came up again and again throughout our work this past year. The drain on time and resources that it represents to families struggling with poverty is staggering. Ultimately, though, we felt that trying to address transportation barriers through the expansion of traditional public transportation options would not be in keeping with our public health focus of trying to go as far upstream as possible to treat causes and not symptoms.

Focusing our energies on connecting people to living wage jobs and fighting against housing segregation in the County are the ways in which we’ll address transportation barriers. People with good, living wage jobs have multiple options when it comes to transportation, and can pick the one that is most convenient for them. People who live in the same town where they work don’t need more bus routes.

While we believe our energies are best spent going right to the core issues, we welcome any expansions in transportation options that come in the meantime: both in traditional and innovative models. During one of our community conversations, one group of residents currently struggling with poverty suggested an “Uber-style” transportation business that employs and is owned by people living in poverty. Some local employers are considering paying for direct shuttles to get their employees to and from work.

We support all of the above, and will work with and support our partners at the Lancaster Chamber of Commerce and Industry, ASSETS and others as new opportunities to expand transportation options and build new transportation businesses emerge.



Sylvia is a single mother. Her son has special needs. She was a statistician for a city in Cuba for eight years. Here in Lancaster she works second shift in a factory for barely more than minimum wage. Her ability to speak English stood in the way of her thriving in Lancaster and contributing her skills and experience to our community. Her need to earn enough money to feed her child and put a roof over their heads stood in the way of her improving her English. Sylvia is working hard, but she's stuck. She needs a system that lets all her hard work get her ahead.

EDUCATION

<p>GOAL: Ensure that our youth can achieve success and self-sufficiency by preparing them with all necessary education and supports, in and out of the school environment.</p>	<p>OUTCOME: Young people achieve the secondary or post-secondary qualifications and awareness of the labor market to acquire living wage-employment as adults. By 2032, resources and capacity will be established so</p>	<p>that all children living under 300% of the poverty line will have access to high-quality pre-k. Concurrently, the percentage of over-25s with postsecondary qualifications will increase to 66.5%.</p>	<p>FOCUS: Youth, from birth to post-secondary completion, especially those in households below 185% of the federal poverty guidelines, or less than \$45,052 for a family of four.</p>
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	Year 1	Year 5	Year 10	Year 15
Pre-K Access	20% access	35% access	65% access	100% access
Post-Secondary Completion	26% completion rate	34% completion rate	46.5% completion rate	66.5% completion rate

A post-secondary education is a strong predictor of future employment and income levels, which, in turn, are strong predictors of health and social well-being. This is more complex than it sounds. It is commonly assumed that a poor education results in poor life indicators, but the reverse is true just as often. Children, especially young children, have difficulty learning when confronting hunger,

poverty, neglect, and other toxic stressors. In fact, research has shown that these stressors impact their neurological development over a lifetime, creating a vicious cycle.^{92,93}

Interventions and support to stem the negative effects of toxic stress are effective throughout the educational career. However, according to

research from the Center for the Economics of Human Development “the optimal policy is to invest relatively more in the early years...but early investment must be followed up to be effective.”⁹⁴

Improving the quality and safety of every educational environment in our community is a shared responsibility, and it must be understood that the home is the first educational environment anyone experiences. Better education is not just teaching students the right things, but preparing them to learn at the next level, all the way to the appropriate level of postsecondary certification necessary to achieve their dreams.

Education is not just a means to prepare for the next steps in life, but a central hub for community. Schools form a key part of a child’s life, and often represent an oasis of safety and stability in at-risk neighborhoods.

The Commission wishes to emphasize post-secondary education as an ultimate goal, but we also want to make clear that this does not simply mean a four-year college degree. While this kind of degree has benefits for those who pursue it, it does not provide the necessary skills for all careers, and meaningful, well-paying positions can be obtained without a college degree. Georgetown’s Center for Education & Workforce estimates that 57% of all Pennsylvania jobs will require some kind of postsecondary education within two years.⁹⁵ The need for post-secondary education is clear, but that education is not necessarily a four-year one. Skilled trades remain valuable, with respectable, above-average median incomes,⁹⁶ and should be considered as young people chart their career pathways.

The Commission makes the following recommendations to address the various facets of

the educational process: early education, primary and secondary schooling, and postsecondary education and training. The School District of Lancaster is responsible for the primary and secondary education of students living within the city limits and in Lancaster Township, and while the recommendations do not give specific direction to the District, they do call for alignment between the district, after school mentoring and enhancement programs, postsecondary institutions, and workforce stakeholders.

Our schools are the trusted guardians of the great potential, aspirations and expectations for our young people. Schools can be sites not just for “book learning,” but the development of academic and non-academic competencies. A school can be a locus of community in its own right. We advocate for the expansion of the community school model, with the knowledge that this will require support from entities external to the school district and with the belief such investments are more than worth it.

EDUCATION STRATEGIES & ACTION ITEMS

Education Strategy 1: enhance and expand quality, early education, Pre-K and childcare offerings in Lancaster County

- Establish system making high-quality, evidence-based Pre-K available and affordable for all families
- Develop programs to empower current and future parents to create healthy home learning environments for children and expand existing programs that do so
- Provide training and support for those

seeking to start, expand or improve existing childcare centers & align evidence-based standards for childcare throughout community using the United Way-funded SAIL model

Education Strategy 2: use community resources to equip, strengthen, and expand educational and supplemental offerings for elementary, middle, and high school students

- Expand community school model to more schools within the School District of Lancaster and equip schools with all the programming needed in their neighborhood to strengthen residents and decrease poverty to include programs outside of the SDOL budget and resident-created and led programs
- Support and strengthen out-of-school programs that provide education, mentoring, and nutrition support for District students & align these programs with SDOL curriculum

Education Strategy 3: structure education, pre-k through post-secondary, to increase connectivity with workforce needs and increase post-secondary completion using models proven by the Lumina Foundation's 75 Cities Initiative

- Start the bridge to postsecondary completion at birth by building parent capacity, including the time to invest in their children
- Create connectivity and warm hand-offs at every stage of the student's journey to ensure a clear and stable bridge to postsecondary completion
- Provide holistic support to parents and other

family members who might otherwise short-circuit the student's progress

- Increase communication and coordination between secondary education providers, post-secondary providers, and workforce stakeholders. Link post-secondary goals to future living-wage workforce opportunities

FINDINGS

Education Strategy 1: expand high-quality early education

HIGH-QUALITY PRE-K

When early education offerings are high quality, and provide safe, healthy environments for learning, they can be a gamechanger, especially in the lives of young people from low-income families. The research is clear on this. Long-term studies dating from the '60s and '80s indicate significant benefits for health, social, and achievement outcomes.⁹⁷ The Perry Preschool Project followed 123 low-income students from preschool age through age 40, and found that those who participated in comprehensive early education were:

- More likely to be employed, by 14 percentage points (76% vs. 62%)
- Less likely to have been arrested at any point in their lives
- More likely, among males, to have raised their own children, by 27 percentage points (57% vs 30%)
- Less likely to use sedatives, marijuana, or heroin⁹⁸

A 2011 analysis of this project estimated the return on investment to be 16 dollars for every dollar spent on preschool education for the program participants.⁹⁸

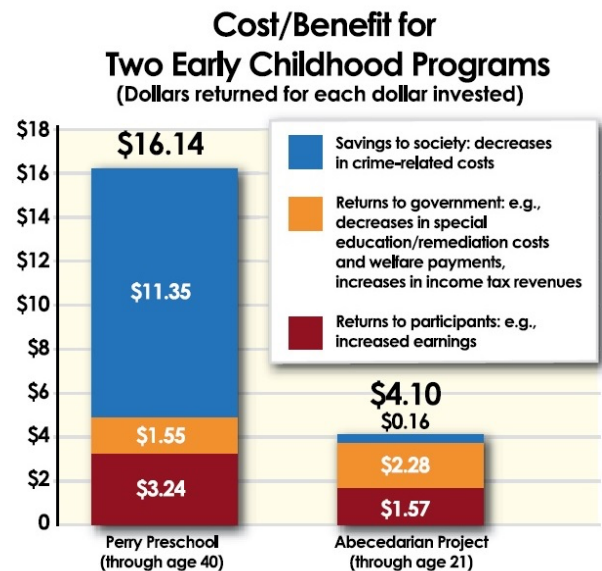
More recent studies in Michigan,⁹⁹ Massachusetts,¹⁰⁰ Maryland,¹⁰¹ Oklahoma,¹⁰² Pennsylvania¹⁰³, and other states show significant short-term gains, with state-funded programs,¹⁰⁴ programs with “intentional teaching, particularly one-on-one and with small groups,”¹⁰⁵ and programs with high quality standards in terms of literacy activities and teacher qualifications resisting the “fade-out” of pre-school gains that has featured prominently in recent literature.¹⁰⁶

The first 5 years of a child’s life are crucial, in terms of their development,^{107,108} and young people in concentrated poverty neighborhoods face damaging stressors and low-input, low-literacy environments. This results in “a cumulative and negative effect on verbal development and achievement” and “may have a greater effect on inequality in school test scores than coming from a low-income family.”¹⁰⁸

The Commission believes that where we can provide a healthy, safe environment for a child to learn, we should, and that broadening affordable Pre-K access can provide that environment for the children who need it most. We therefore endorse the efforts of Pre-K for PA to ensure that “every at-risk child will have access to a high-quality pre-kindergarten program and middle-income families will more easily afford these services for their children”¹⁰⁹ across the state.

Recognizing that we cannot simply wait for the State to make the changes we need for our community, we recommend the expansion of existing early education programs in Lancaster County, such as

Figure 10 - Cost/Benefit for Early Child Programs



Head Start, and those offered by the Lancaster Recreation Commission, and the School District of Lancaster. Emphasizing the importance of family participation, we recommend a cohesive messaging effort among providers of high-quality early education to reach community members and increase participation.

ENHANCING HOME LEARNING QUALITY

The Commission recognizes the prevalence of in-home childcare centers in the Lancaster community. For reasons of cost, confidence, familiarity, and convenience, families may choose license-exempt care provided by friends, relatives, and neighbors. Nationally, this choice is more common among immigrant families, and families of children with special needs.¹¹⁰

To ensure that childcare quality remains high in all such centers, the Commission recommends that outreach be made to providers of in-home childcare. Training and support should be provided, so that parents who choose this option for their child's early education and care can be confident in their child's development.

Similarly, messaging and outreach to low-income families around childcare, especially those living in concentrated poverty neighborhoods, must be improved. Training programs for parents, and home visiting and support programs such as Parents as Teachers,¹¹¹ show credible, positive outcomes for improving home environments, increased healthcare utilization alongside decreased child maltreatment,¹¹² and, increasing third-grade achievement,¹¹³ a predictor of high-school graduation.¹¹⁴ Some of the greatest struggles in early child interventions come in "successfully enrolling, engaging, and retaining families,"¹¹⁵ and so communication and retention efforts with low-income families must be prioritized.

Education Strategy 2: use community resources to improve, supplement school district efforts

EXPANDED COMMUNITY SCHOOLS

A community school is a "set of partnerships between the school and other community resources" with an "integrated focus on academics, health and social services, youth and community development."¹¹⁶ By linking the primary site of a child's education to community events, skills and language training, health and case management services, and nourishment programs, etc., the community school model creates a strong relationship between neighborhood and education. Community schools are as diverse as the communities they serve, tailoring their service

offerings to the needs of the area where they are situated. While these offerings are externally-oriented, the real beneficiary of a community school is the student. By connecting the student and their family with the resources to meet their needs and limiting their points of entry, the community school insulates the student from the distractions and vicissitudes that reduce academic performance and helps them to understand school as a safe, positive environment.¹¹⁷ Students show increased test scores and increased attendance in community schools across the nation, particularly in those schools which make physical and mental healthcare available onsite.^{118,119,120} Burdens on both teachers, students and, ultimately, neighborhoods, are eased.

At the time of writing, the School District of Lancaster has community schools at Reynolds Middle School (where it is combined with the refugee center), Lincoln Middle School, Washington Elementary School, King Elementary School, Fulton Elementary School and Burrowes Elementary School. In a district where 89% of students are eligible for free and reduced price lunches,¹⁷ the Commission feels that the expansion of the community school model is natural and sensible.

The fundamental premise of a community school is that the school can not do it alone. All over the country, community schools rely on on-site partnership with a variety of service providers. We recommend creating community school sites in Lancaster's concentrated poverty neighborhoods, where SDOL schools are certainly present. This is also a recommendation to the non-profits, early education programs, anti-hunger agencies, literacy programs, and community centers to financially support and participate in such an endeavor.

INCREASE LEARNING TIME IN & OUT OF SCHOOL

Whether part of a community school site or not, our students rely on supplemental programs for intellectual stimulation, recreation, and even nourishment. If education is a path out of poverty, then these programs are indispensable. Compared to middle-income peers, low-income students lose thousands of hours to classroom disruptions, delayed-starts, out of school suspensions, or worry about home issues, according to a report on this disparity from UCLA.¹²¹ These effects were the greatest in “high-poverty schools”, that is, schools where the percentage of students receiving free and reduced price lunch was between 75 and 100 percent.

Over the summer, when middle and upper-income children are engaged in stimulation and educational activities, many of their lower-income peers are not. This, too, results in thousands of hours of lost educational time. Looking to studies like Lasting Consequences of the Summer Learning Gap, along with testimony at public hearings, the Commissioners learned just how severe this gap in summer learning time is. Lasting Consequences, a study from Johns Hopkins University, found that of the reading achievement gap between high-SES and low-SES students, “two-thirds of the total, traces to summer learning differences over the elementary years.”¹²²

A collaborative effort is clearly needed to ensure that students from the School District of Lancaster are engaged during the summer months to minimize achievement gaps accumulating over the educational career. Various service providers for programs like these are active in Lancaster, but they do not have the funding or capacity as separate entities to meet the full need in the community.

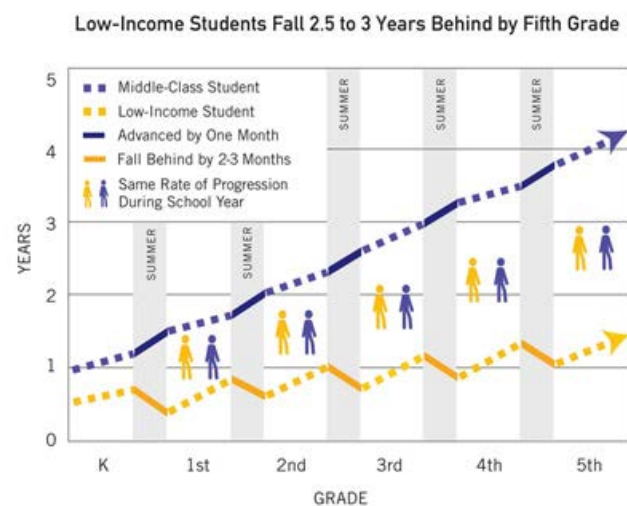
That is why we suggest a collective impact approach coordinated by SDOL that allows various providers to share resources, leverage funding and attract new investments by working together.

Education Strategy 3: structure education, pre-k through post-secondary, to increase connectivity with workforce needs and increase post-secondary completion

ALIGN EDUCATION PATHWAYS

Expanding high-quality early childhood care options, and investing in schools as sites of community will be strong starts for increasing the efficacy of an education in Lancaster, but it cannot be the end of the work. Students rarely opt to pursue skilled trades after secondary education, despite the field’s potential to provide a living-wage. College and other post-secondary options remain intimidating to students. These students need to be exposed to and engaged by postsecondary and workforce stakeholders early in their high school years, if not sooner.

Figure 11 - Summer Learning Loss



Source: Cooper, H., Borman, G., & Fairchild, R. (2010). "School Calendars and Academic Achievement." In J. Meece & J. Eccles (Eds.), *Handbook of Research on Schools, Schooling, and Human Development* (pp. 342-355). Mahwah, NJ: Erlbaum.

“We should invest in programs that take our children out of the cycle of poverty-keep them in programs that keep them off the streets.”

-community conversation

“A city’s ability to reinvent itself is directly connected to the level of educational attainment of its citizens, and ultimately a city’s ability to attract employers is connected to being able to provide qualified employees.”

-public hearing testimony

“Education does better when it’s integrated racially, economically, culturally. You get better results.”

-public hearing testimony

In Richmond, RVA Future Centers in the five comprehensive high schools provide postsecondary counseling, assistance with financial aid and other applications, and connections to internships and other opportunities to prepare for their continuing education.^{79,80} The program involves a full-time staff member in each school dedicated to helping students navigate their post-secondary options.

The School District of Lancaster has recently redoubled their efforts to emphasize post-secondary options to students. The Commission recommends that workforce and education stakeholders meet them in this endeavor, and create a formal partnership program with the school district that pursues two goals:

- Like RVA Future, dedicated support for students looking to post-secondary education, with connections to educational institutions and large employers
- An awareness of education burdens and the future of the workforce, so that students and schools are aware of future workforce needs

In Richmond, partnership between the Office of Community Wealth Building and Richmond Public Schools is showing promise as they enter their second year.⁸⁰ The Commission feels that similar dedicated support and alignment will increase the number of students who pursue and complete postsecondary education, and therefore, the number of students who achieve family-sustaining careers as adults.



Jennifer is set to graduate in the top ten percent of her class. Since Freshman year she's been involved in a great program that has been helping her improve her academics and prepare for college. As a result she's been accepted into a very good four-year school out of state with a full scholarship. Jennifer is planning to turn it down so she won't have to leave her mother and younger sister alone. She plans instead to attend community college part time in order to work full time and contribute to their family.

HOUSING

<p>GOAL: Create a safe and healthy housing environment where, whether it is rented or owned, a family's home encourages self-sufficiency, rather than adding additional barriers.</p>	<p>OUTCOME: Lancaster City & County will see a decrease in the share of housing-burdened households as more families achieve quality affordable housing. Over a 15-year period, 100 additional homes will be rehabilitated for</p>	<p>homeownership, and a non-profit landlord entity will possess 60 quality, affordable housing units.</p> <p>FOCUS: Countywide, with emphasis on communities with a high rate of housing-burdened households.</p>
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	Year 1	Year 5	Year 10	Year 15
Affordable Rentals	4 properties	12 properties	34 properties	60 properties
New Homeowners	5 properties	27 properties	61 properties	100 properties

Lancaster County is in the midst of an affordable housing crisis. A 2013 report commissioned by the Lancaster Housing Opportunity Partnership detailed several worrying indicators about housing in our community, including:

- 47.8% of renter households are burdened by the cost of housing (paying more than 30% of their income in rent)
- Median rents are mismatched with median renter incomes, indicating broad unaffordability

- Occupancy rates in rental properties almost universally exceed 95%
- Transportation options are "limited"
- A combination of the housing crash, low financial capacity, debt, and other factors has led to a preference for rental over homeownership among millennials as part of a general "housing slump"¹²³

Indicators for Lancaster City are worse. 44.6% city residents - 57% of renters - are housing-burdened,

even by apartments in low-income, economically depressed census tracts.¹²⁴ Residents in these areas struggle to make ends meet in low-quality apartments, where rent takes up most of what income they make, forcing them to make trade-offs between buying food, seeking medical care, and paying utility bills.^{125,126} With housing demands in the county set to increase, and poverty having risen slightly for the county in the past year, this direction for our housing market is unsustainable.

Housing has direct implications for workforce. Many low-income residents of Lancaster, not being able to secure regular access to reliable transportation, find themselves at a disadvantage when seeking employment. For low-income persons in the city, many large employers, especially in the contracting and industrial sectors, are too far away to access in any kind of timely manner. Vehicle ownership is often a significant hurdle for low-income families, and without access to transportation, the path to self-sufficiency can be disrupted before it meaningfully begins.

The Commission's approach to transportation focuses on desegregating housing. If low-income persons can acquire housing with convenient access to employment, transportation ceases to be a barrier.

However, these transportation barriers are also capably addressed by those employers who provide housing and transportation support for their employees, whether by employer-assisted homeownership, work shuttle, or other means. These sorts of programs connect jobs to the workers they need and households to sustainable wages.

A constructive approach to housing policy must enhance the ability of families to afford housing,

“

“Housing, as we know, is a basic necessity of life, like food, water and clothing. But what receives less attention is the fact that the location and condition of the housing in which we live are key factors or indicators of one's future.”

-public hearing testimony

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through workforce and other interventions and remove regulations which stand as barriers to the construction of affordable housing. We experience our housing crisis as a community; its consequences spread to all corners of the county. We must, therefore, be willing to address the zoning codes and “not in my backyard” attitudes, and make the argument that more affordable housing where the jobs are means a safer, healthier, more productive county.

Connecting workers to jobs in the rest of the County does not mean that we can abandon efforts to improve both the quality and affordability of housing in the city. Simply routing people out of Lancaster's poverty-stricken neighborhoods will only serve to leave people behind. Lancaster's SouthEast and SouthWest lose millions of dollars in rents every year to landlords outside the community. A community development corporation in those neighborhoods could set a new model for responsible landlord behavior, and provide support to faith-based and community landlords who operate in the same model.

Whether rented or owned, we are seeking to create more homes for Lancaster residents. We can make our rental environment more affordable, while increasing homeownership and community ownership. When housing is threatened, unstable, or unjust, education suffers, careers suffer, neighborhoods are disrupted. As detailed in Lancaster Newspapers, we have clear evidence of this in our city. These strategies seek to undo that damage and change the trajectory of our housing market.

HOUSING STRATEGIES & ACTION ITEMS

Housing Strategy 1: Increase Homeownership County-Wide

- Create more opportunities for residents of impoverished areas to purchase homes both in the city and in other Lancaster County municipalities close to where they work to lower housing costs, build assets and end transportation problems
- Encourage and support other large employers in Lancaster County to assist their employees in securing housing near their work site (like LGH and F&M model)

Housing Strategy 2: Improve Affordable Renting Environment

- Establish community development corporation to act as scattered site non-profit landlord, setting bar for keeping rents affordable and quality high, and supporting faith-based and private landlords doing likewise (including developing models that

allow residents to become landlords in their own neighborhoods)

- Work with municipalities county-wide to decrease regulatory barriers to affordable housing development
- Develop opportunities to build or renovate properties so there are small business spaces on the first floor with affordable housing opportunities above

“I really think that if people want to live in Lancaster, such a great community that is making tremendous strides, they should be able to do so with lower housing costs and more opportunity.”

-public hearing testimony

FINDINGS

Housing Strategy 1: Increase Homeownership County-Wide

INCREASE HOMEOWNERSHIP OPPORTUNITIES

The case for homeownership is to be made not just in terms of individual or household family benefits, but also in terms of solidifying communities and local ownership. To the individual or family, a home is “a place to live that also includes an expected investment benefit,”¹²⁷ assisting families in the accumulation of new wealth. Homeownership remains “one of the most important ways for low-

income and minority households to build wealth and move up the economic ladder.” Increasing access to affordable homeownership offers families the stability necessary to build and develop financial and social capital.

For this reason, homeownership is an investment in communities as well as individual families. Research finds that homeownership provides an incentive to investment in the property, and in the neighborhood where the home is situated. From the Federal Reserve Bank of Philadelphia:

“More money is spent on maintaining owner-occupied housing than is spent on maintaining rental property; homeowners spend more time gardening than renters; and rental property depreciates faster than owner-occupied property. Second, homeowners’ children are more successful, measured by such factors as lower teenage pregnancy rates and higher educational attainment, than kids from non-owner occupied dwellings. Third, homeowners socialize more with their neighbors.”¹²⁸

Research from the University of North Carolina’s Center for Community Capital finds that homeownership increases neighborhood stability and collective efficacy “thereby reducing crime levels” with positive effects for “residents’ physical and mental health.”¹²⁹ It also found that with fair, traditional-term mortgages, low-income families are four times less likely to enter default, as compared with the subprime loans common immediately before the housing crash.

Despite significant benefits, structurally, “the current system of low-income housing assistance is strongly biased against homeownership.”¹³⁰ When considering rental assistance and homeownership tax credits together, government investment in

housing is largely regressive, with the largest subsidies going “to those in the highest tax brackets, that is, those with the highest income.”¹³¹

From this research and more, the Commission concludes that increasing homeownership in Lancaster’s low-income communities will create more ownership, generating financial and social benefits for those communities and the County as a whole. We have a responsibility, therefore, to assist the economic development and social reconstitution of neighborhoods disrupted by ill-fated urban redevelopment projects of the past and absentee landlords. The Commission supports all such efforts ongoing in Lancaster, and recommends their expansion via increased financial and community support.

Homeownership throughout the county must be available to low-income families. Connecting these families to jobs, and creating opportunities, like homeownership, for them to build wealth, must go hand-in-hand. County efforts toward housing justice should look to homebuying assistance and other methods of expanding homeownership opportunities, particularly as a workforce development and community investment strategy.

As a city stabilization strategy, homeownership combined with community revitalization is crucial. If we just raise people’s incomes without helping people set down roots in improving neighborhoods, we take the risk of creating a revolving door of poverty. People who we help get better jobs move out of the city because nothing is improving and/or they have no homeownership opportunities, and then the next impoverished renter moves in. Poverty in the city stays the same. That’s not the cycle we want to create.

When we help someone get a good job in the

city, we need to help them also purchase a newly rehabilitated or built home there if they want one. If they don't, we need good, affordable rental options. Owning in the city will be less expensive than renting. When we help someone move closer to a good job outside of the city, we need to intentionally try to make that vacancy an opportunity for someone like our first example. Stop the revolving door. Set people, and the community, on a path toward something better.

The Commission also recommends supporting and creating models that help local residents purchase and manage duplexes and other small multi-family properties that allow them to become landlords. We also recommend cooperative models like those established by Community Loan Fund in New Hampshire. Their ROC-NH program allows mobile home owners who rent the land under them to purchase the land under their homes by organizing them as co-operatives.¹³² All of these strategies would allow the wealth of the community to stay, and continue to circulate, in the community.

EMPLOYER ASSISTED HOUSING

Franklin & Marshall College and Lancaster General Health, large employers located in the NorthWest and NorthEast of Lancaster city, respectively, provide such assistance to their employees, in the form of mortgage insurance, loans for down payments and closing costs, forgivable over 5 years, and assistance with home improvements.

Such programs are win-win. They are a clear and significant boom to employees, providing easier access to all the homeownership benefits mentioned above. They also provide large benefits to the employer in return for their investment. According to Harvard University's Joint Center for Housing Studies, Employer-assisted Housing "can be

a cost-effective business strategy for employers who are having difficulty recruiting and retaining workers in locations with tight housing markets, or who are operating in distressed communities. In addition, it can be an extremely desired benefit for employees in areas with unaffordable or scarce housing."¹³³

These efforts are to be commended for facilitating home-buying in a crowded city market. Unfortunately, the established areas for these two programs confine employees to the respective city quadrants of their institutions. The Commission acknowledges the legitimate reasons (proximity, walkability, etc.,) for the programs' geographical limitations, and those limitations' role in sustainability and decreasing transportation barriers as an employee issue. The Commission also acknowledges public hearing testimony on how such assistance would be constructive in low-homeownership census tracts. Loyola University Chicago's program expands the geographic area eligible for such assistance to include homes along the Chicago Transit Authority's Red Line.¹³⁴

Employer-assisted housing is a solution that can work for individuals, employers, and neighborhoods. We strongly recommend that other large county employers consider such programs as a way of investing in employees and engaging in community accountability. We also recommend that existing programs consider options as to how to expand these programs to bring their transformative potential to bear as a community development strategy where need is greatest.

Housing Strategy 2: Improve Affordable Renting Environment

NON-PROFIT LANDLORD

The Commission recommends the creation of

a scattered-site, non-profit housing agency in Lancaster, one with strong community partnerships and a pipeline of existing resources to acquire, improve, and rent properties in low-income areas within Lancaster County.

By establishing a community development corporation focused on this goal, Lancaster can take advantage of grants and tax incentives available to nonprofits and affordable housing entities, to keep rents low while maintaining unit quality. Once increased capital is developed and a larger number of units are acquired, this has the advantage of setting a standard of fair rental housing in the community.

In 2009, a study by Franklin & Marshall College found that \$19 million leaves Lancaster's SouthEast quadrant annually as rent paid to landlords external to that community as "86.5 percent of properties... are registered to out-of-area addresses."¹³⁵ Much of that money is profit for these landlords. By acquiring properties there, a nonprofit could return much of that money to the community by way of lower rents, to say nothing of reducing dollars lost to health crises caused by low-quality housing. The Enterprise Foundation's guide *Developing and Managing Scattered-Site Rental Housing* describes this model as advantageous when it is "strategically necessary to take control of these properties from owners with less motivation to maintain the real estate and work with residents."¹³⁶

A 2009 report from the Joint Center on Housing Studies underlines the importance of partnerships in such an endeavor, as well as the cooperation of local governments in facilitating that acquisition and support of such properties for the public good. It specifically addresses land-banking, explaining that by "acquiring tax-foreclosed properties rather than selling tax liens to private bidders, land banks

can encourage quicker property rehabilitation and reuse than private actors would."¹³⁷

With Lancaster City's newly-created land bank, the strategic capacity is available to provide this assistance to a community development corporation. Knowing this, the Commissioners further recommend that the City of Lancaster prioritize the new housing agency, especially as it regards to bidding on properties acquired by the land bank, as well as other funding opportunities.

REDUCING BARRIERS

Affordable housing "is a crucial component of the economic health and stability of a community".¹³⁸ Though poverty in Lancaster County, and therefore the population with the most serious affordable housing needs, is relatively more concentrated in the City, 70% of poverty in the County is outside the city limits.⁵ Housing for low-income persons on the path to self-sufficiency should not be constrained to limited areas; doing so would only serve to concentrate poverty.

However, as a County, we often find that we are working against ourselves in this shared goal. A plethora of zoning and other regulations throughout the county may prohibit, complicate, or make more expensive the development of new affordable or mixed-income housing, as detailed in the Lancaster Housing Opportunity Partnership's *Analysis of Regulatory Barriers to Housing Affordability*.¹³⁸

This is not a problem unique to Lancaster County, but a national one, affecting urban, suburban, and rural areas, as detailed in a 1991 report from the Department of Housing and Urban Development (HUD), titled *Not in My Backyard*. The report makes clear that it is not only regulatory barriers that stand

in the way of such development, but the attitudes that contribute to them: “One central and overriding cause is the dislike of both residents and public officials for additional or different kinds of housing in their neighborhoods and communities.”¹³⁹

A 2005 report, *Why Not in Our Community?*, follows up on the issue of these regulatory barriers. Most importantly, it addresses the importance of making it clear that “access to adequate affordable housing is not simply a matter of equity. Increasing the supply of affordable housing will create jobs, stimulate economic growth, and sustain the long-term economic health of our cities and metropolitan areas.”¹⁴⁰

Having heard expert testimony at Commission hearings, and the voices of citizens at community hearings who cannot afford housing in areas they feel would provide them better access to jobs, we strongly recommend that such regulatory barriers be continually evaluated and removed, or that exceptions be made for quality affordable housing projects endorsed by the Coalition to Combat Poverty and the new CDC.

The Commission strongly supports efforts by employers to build housing for their employees.

Employment site-centered affordable housing can assist families in securing a job and building wealth. However, many communities that are optimistic about inviting in new employers and reaping the tax benefits are resistant to the idea of housing their employees. That must become unacceptable in our County and all of its municipalities.

When we welcome a business into our communities, we have to welcome the people who work there - the whole enterprise is for naught otherwise. Removing these and other barriers to acquiring affordable housing and living-wage employment can deconcentrate poverty and open new paths to self-sufficiency, to the economic benefit of the entire Lancaster County community.

Recognizing the importance of outreach to achieving this goal, we also recommend the creation of an organized messaging and lobbying campaign to appeal to community residents and their representatives on this issue. Where outreach is not enough, we support housing developers and housing advocates seeking remedies within our court system.

“If we are going to talk about something that touches every part of a person’s life, it’s the roof over your head.”

-public hearing testimony

“These landlords aren’t present. They aren’t accountable. They do what they want. My roof fell in, where was my landlord?”

-community conversation



Michael has a good job outside of the city. It's hard work with a ten to twelve-hour shift, but it pays the most he's ever made, and could lead to a career that changes everything for his family. The problem is the bus schedule doesn't match his work schedule, so he arrives at work almost two hours before his shift starts. All told, his transportation adds over three hours to an already long day: time he could spend with his family. Michael would consider moving closer to work. He'd save almost \$5,000 per year on rent alone given the market rates, but there aren't rentals available in the town where he works, and there are no plans to build more housing there.

COMMUNITY

<p>GOAL: Develop new institutions, leaders, and approaches in Lancaster, all accountable to its historically disenfranchised communities.</p>	<p>OUTCOME: Ongoing assessment and development of community assets will allow for targeted antipoverty efforts and community ownership of initiatives.</p>	<p>FOCUS: Low-income County communities and the institutions that serve them. In hearings, at community conversation and in the newspaper, residents, journalists, and experts have communicated to the commission</p>	<p>an issue that needs to be addressed: the alienation of people in Lancaster County from resources, institutions, and representation, even in the agencies designed to help them.</p>
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	Year 1	Year 5	Year 10	Year 15
Block Captains	3	10	15	20
New Neighborhood Groups	1	3	5	7

Often, Lancaster’s residents feel that they are disconnected from capital, disconnected from transportation lines, and disconnected from the leadership that makes decisions about their communities.

How then can we make government more accountable to the residents of low-income communities? How can existing assets which currently send resources out of the community be leveraged to develop the community and advance the interests of its residents?

A report from the Urban Institute on states that the future of community development corporations is in the “creation of new relationships among city agencies, foundations, corporations, and financial institutions within community development.”¹⁴¹

A macro approach to the CDC-model will benefit Lancaster by embracing this future of increasing partnership rather than competition for resources. The CDC will build financial capital and assets by engaging collaborative approaches to workforce, housing, and other services in Lancaster’s highest-poverty census tracts.

The development of human capital, that is, potential leaders and service providers in low-income areas, is essential to our success in combatting poverty. In a way, this is not about creating something new, but recognizing existing structures within communities, and linking them to resources and support. The development of community organizing mechanisms among low-income residents allows them to hold other institutions and stakeholders accountable. This idea was at the heart of the War on Poverty-era community action movement.¹⁴²

While it is not a strategy in itself, the Commissioners agree that community empowerment must be the mode for our interventions going forward. Taking cues from best practices research in the work of health promotion, centering such empowerment involves constantly evaluating our efforts for efficacy and ownership. An article in the journal, Health Policy & Planning recommends that, among others, we question how “implementation:

- improves stakeholder participation
- develops local leadership
- builds empowering organizational structures

- improves resource mobilization.”¹⁴³

We also feel that rigorous evaluation of trends and developments in our community is part of our accountability. Where data exists or can be generated to measure our outcomes or community indicators, we should take the opportunity to become more informed anti-poverty agents. With that in mind, we submit the following recommendations for community development and engagement.

COMMUNITY STRATEGIES & ACTION ITEMS

Community Strategy 1: Develop human and institutional resources in Lancaster’s impoverished neighborhoods

- Develop a macro community development corporation in the city of Lancaster, composed of already-engaged non-profit agencies which serve in place of staff/ departments, to bring separate economic, housing and community development interests together with a County-wide mission and an initial strategic focus in the City of Lancaster
- Identify and develop potential leaders in Lancaster’s SouthEast and SouthWest quadrants, and provide these “community organizers” with support and funding to advance neighborhood priorities
- Combine all efforts within impoverished communities with voter registration and turn-out efforts. Make voter registration available to those eligible with all service provision

Community Strategy 2: Assess gaps, assets, and demographic trends across Lancaster Community to guide current and future interventions

- Conduct a public health research project to identify factors contributing to the current decline in teen pregnancy rates & lay out an intentional plan to accelerate this decline as well as replicate this success in existing single parent households
- Work with existing stakeholders to identify and deconstruct ongoing needs in housing, hunger, homelessness, and other contributing/resultant elements of poverty

FINDINGS

Community Strategy 1: Develop human and institutional resources in Lancaster’s impoverished neighborhoods

MACRO COMMUNITY DEVELOPMENT

The Mayor’s Commission to Combat Poverty proposes that a new, macro-level community development corporation (CDC) be established in Lancaster as an anchor and home to many of the other anti-poverty strategies recommended in the plan. Certainly, efficacious community development organizations exist in Lancaster, such as the Spanish American Civic Association, but the Commission’s proposal aims to unite the county’s premier agencies, and their resources and staff to combat poverty.

Where resources will be necessary to achieve our goals for housing, education, and workforce, a community development corporation is able to pool

the funds and assets necessary. By maintaining a macro-structure, this CDC would have several advantages over a more traditional community development organization:

- Being composed of whole agencies, the CDC would be connected to a wide pool of staff and talents to achieve shared goals
- The CDC would provide for the concentration of resources where they are needed - the community - rather than competition for resources
- Greater impact, owing to its ability build projects across disparate funding streams which previously had discouraged collaboration

More on this, and how it fits in with the rest of the Commission’s strategy can be found in the section titled “The Approach.”

NEIGHBORHOOD LEADERSHIP

An unavoidable part of how we arrived where we are is the disenfranchisement of minorities and the poor. It is to be expected, then, that improving our communities in a meaningful way must necessarily include mechanisms by which to re-empower them. The work is not possible without it. Interventions need to establish trust and credibility, which can only be done by engaging the community. The Commission feels that we must go beyond engagement to community ownership, ensuring that neighborhood residents are a part of decision-making and information gathering.

Community residents are likely to have a deeper understanding of the issues they face than any external party. They recognize stumbling blocks

and barriers to interventions that may otherwise go unseen. We must understand the individuals and communities that we serve as capable participants and leaders in the anti-poverty work that affects them.¹⁴⁵

We feel that it is important to develop capacity within low-income communities, to support them in organizing and advocating for themselves. This allows them to assess their needs and create or advocate for solutions, even if or when they are not in line with institutional priorities. The Commission therefore recommends: 1) the identification of current or potential leaders in Lancaster’s most disadvantaged neighborhoods, in conversation with community members, 2) engaging these leaders in personal development and leadership training, 3) encourage them to identify action items with their neighbors, 4) connecting with funding sources to pay them for their work in the community and support their neighborhood initiatives, 5) expanding the pool of engaged communities and repeat.

These leaders must be brought to the table as staff and board members within institutions doing anti-poverty work in these communities to continue the development of capacity and increase the credibility of the relationship between these institutions and the community. We commend the work of organizations like Leadership Lancaster and the Latino Empowerment Project to increase the diversity and leadership voice of minorities on local boards of directors.

VOTER REGISTRATION

Voter registration may seem an odd anti-poverty, strategy, especially when removing partisan concerns from the conversation. However, if combatting disenfranchisement is among our stated goals, then voter registration is hardly unusual, as

a straightforward way to connect people living in low-income communities to decision-making about their lives.

Civic participation is not unrelated to income or poverty; according to the Pew Research Center, “financial security is correlated with nearly every measure of political engagement.”¹⁴⁶ Voter turnout increases as income goes up.¹⁴⁷

The Commissioners recommend that voter registration for eligible citizens be connected to service delivery and points of entry. Non-partisan civic education and voter turnout efforts should be linked with messaging efforts in low-income communities.

Community Strategy 2: Assess gaps, assets, and demographic trends across Lancaster Community to guide developing and future interventions

TEEN PREGNANCY PROJECT

Despite remaining higher than that of other wealthy, Western nations,¹⁴⁸ teen pregnancy has declined nationally over the past 25 years, going from 61.8 births per thousand girls aged 15-19 in 1991 to 24.2 in 2014. Both these figures are much lower than the 20th century peak in 1957, at 96.3 per thousand girls, though 85% of these mothers were married - today, 89% of teen mothers are unmarried.¹⁴⁹

Recent trends in Lancaster City and County mirror these general declines. Births to girls younger than 18 as a share of all births in Lancaster City decreased from 8.3 % in 2004 to 4.4% in 2013. Over the same period, the births to teen mothers as a share of Lancaster County births fell from 2.5% to 1.7%.¹⁵⁰

The Commissioners are pleased by this trend, but have seen little information around contributing factors in Lancaster specifically. Nationally, research suggests that unwed teen pregnancy is as much a result of poverty as a cause, if not more. A 2012 analysis published in the Journal of Economic Perspectives on the teen birth rate found that “teen childbearing is explained by the low economic trajectory, but is not an additional cause of later difficulties in life.”¹⁵¹ Other research is more reserved in its conclusions, but still pushes back against the notion that teen pregnancy is a primary cause of poverty and suggests that many of the negative social indicators linked to teen pregnancy function more as predictors than consequences.^{90,152-5}

It may be, then that the decline in teen pregnancy in our community is indicative of other factors related to poverty. More study is needed on the implications of this decline. Having received an offer from Penn State Hershey’s College of Public Health to look at some of the existing data and provide further recommendations for next steps, the Commissioners recommend the conducting of a study on the decline in teen childbearing in Lancaster County, as a precursor to a public health campaign to ensure its continued decline.

They further recommend that study results also be applied to curb additional birth rate among existing single mothers as each new birth increases the income that mother would need to rise above the poverty line.

Figure 12 - Teen Birth Rate, Lancaster City

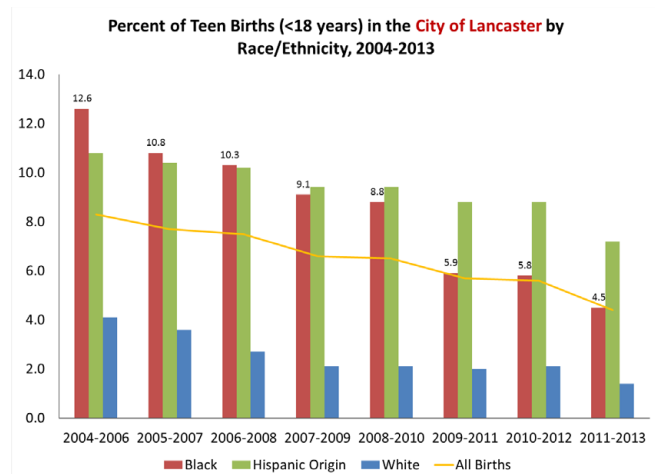
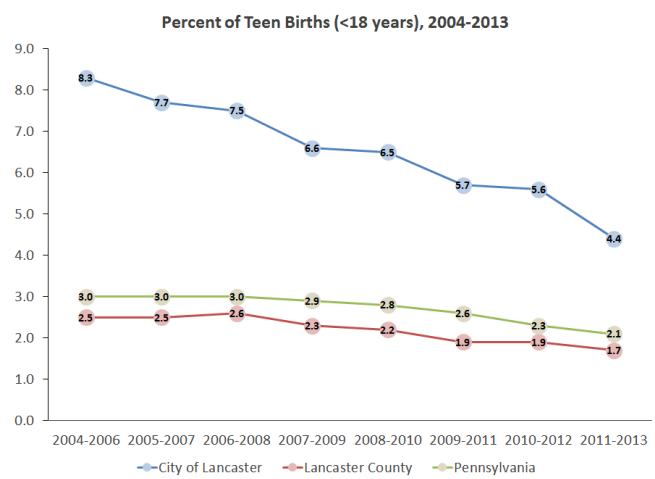


Figure 13 - Teen Birth Rate, Lancaster



Special Note

The topic of drug use and addiction came up more than once in our work, specifically given the explosion of heroin use in our community. While the Commissioners are very aware that drug use can contribute to a person's level of poverty, and that the consequences of drug use tend to be far greater for those living in poverty, we have chosen to avoid any specific recommendations related to drugs and drug addiction. There are three main reasons for this.

First, we have no interest in feeding the stereotype that drug use is higher among the poor. This is a myth. According to the 2011 National Survey on Drug Use and Health, 9.6% of full-time employed people used illicit drugs compared to only 2.6% of unemployed people.¹⁴⁴

Second, we feel that the strategies within this plan will have the ancillary effect of reducing drug use among impoverished families by increasing opportunities for positive activities, community connectivity and living wage employment. As our implementation plan requires holistic, wrap around, person-centered services, we expect our implementation partners with expertise in behavioral health and addiction services to be crucial to our success at helping people with these challenges move past them and towards stability.

Third, we believe that more than a poverty issue, or even a criminal justice issue, drug addiction is a public health issue. A healthy, thriving community ought to have a behavioral and mental health support system operating at capacity to confront mental illness and drug addiction. We support the expansion of our community's current system of care to bring it to capacity.



“It’s very important for people who live in a community to have a sense that they are in charge of what happens in their community, that they are the ones who can affect change.”

-public hearing testimony





Bill is staying with friends. No one will rent to him because of his criminal record. After putting in countless job applications, no one will hire him. He knows he could make plenty of money if he went back to his old life, but he's determined to leave that life behind even though it would be easier. He dreams of being able to work with young people to help them avoid the mistakes he made. Bill could be a leader in his neighborhood. He just needs someone to give him a chance. In the meantime, Bill says his life feels like he's on the outside looking in.



ENDORSEMENTS

Throughout this process of working together as a Commission it has become clear that Lancaster County is an exceptional community with many innovative practices and projects already underway. From being the first County in the Nation to bring both Veteran and Chronic Homelessness to functional zero to building the first shared, multi-organization social service database in the nation, Lancaster is ahead of the curve. What follows is a listing of projects and approaches we endorse because they meet the needs of the residents we spoke to in ways that align with the data we examined, the best practices we reviewed, and the guiding principles we adopted. If these things weren't already happening in Lancaster, we would have to invent their equivalents.

United Way Collective Impact Partnerships

United Way currently has 17 impact partnerships working toward 4 bold goals:

- 100% of our children will enter kindergarten ready to learn
- 100% of students and adults will have post-secondary credentials
- Decrease individuals and families living in poverty by 50%
- 100% of individuals, children and families will have a medical home

The bold goals are aspirational, and our Commission is projecting a longer timeline to cut poverty in half in Lancaster City. We also cannot endorse the work of all 17 impact partnerships without data on their outcomes. We do however, endorse the framework pioneered by the United Way in bringing providers together within the collective impact methodology, making them the first United Way in the Nation to do so. We feel that there are huge overlaps between the United Way's bold goals and the work of the Commission. It is our hope that those partnerships that are engaged in the City of Lancaster will connect to our new Coalition going forward.

County-wide CaseWorthy

We have seen the lack of time in the average day of a person living in poverty, the lack of connectivity in the system, the lack of knowledge about what services are out there, and the lack of public data on how effective those services are (both at the agency level and at the County level). The Lancaster County Coalition to End Homelessness (LCCEH) has already solved these problems within their service area. The tool they use to bring providers and data together is currently being expanded by multiple members of the Commission and others.

The Community Action Partnership (CAP) has partnered with LCCEH, the United Way of Lancaster County and Lancaster General Health to create County-wide CaseWorthy, a shared intake, assessment and data tracking tool for all Lancaster County social service providers. This system will serve as a sort of "electronic medical record" for people needing social services and will include a universal intake and assessment form that will be shared across participating providers so people seeking help will:

- only have to provide intake information once for all providers in the system
- be informed of every program using the system for which they and their household are eligible at their first visit anywhere
- see how far any services are from their homes
- have the option to do an instant referral from one provider to another

In addition to customer convenience, providers will be able to:

- create individualized goal plans for customers
- track progress both individually and across communities
- easily run meaningful reports for funders and others
- identify gaps in service and unnecessary service duplication throughout the County

At the writing of this plan, CaseWorthy is being tested by a handful of non-LCCEH programs and the integration of LCCEH's system with the web-based, county-wide system is underway.

Navigators

We have heard in our community meetings that people want guidance and connection, and not to be treated like a number or a check mark in a box. To quote one woman at Tec Centro "I wish there was someone to help me and keep me motivated." We also know that person-centered care has proven

results in other disciplines (health care, reentry services, the Circles movement, etc.). We throw around the platitude that it is better to teach a person to fish (a relational model) than to give a person a fish (a transactional model), and yet most of the system distributes fish.

Even educational offerings, which are more relational, don't tend to address or account for all of the other crises that can disrupt and undo progress for a person living in poverty. The truth is, no one program can effectively counteract the effects of poverty in a person's life. To succeed, the community must have deeper collaboration among providers and professionals who can connect the customer to the appropriate programs within that collaboration.

We endorse a networked, Navigator model shared across all willing and able social service and faith-based providers. In this model, we would begin to build a holistic care model for households in crisis. If grown large enough, this model could also enhance the United Way's 211 service and given them more options for a warm hand-off for a larger percentage of calls.

The model can also connect individualized goal plans for people served to local employer needs and coordinate training and education related to minimum basic requirements. Navigators could also coordinate gap funding or connection to alternate resources in relation to the Cliff Effect.

As of the writing of this plan, CAP has partnered with the High Companies, LGH and the Pennsylvania Department of Community and Economic Development to create this model, has employed seven Navigators and has held training for over 40 case managers and social workers from multiple

Lancaster County nonprofits interested in adopting this model.

Childcare Support System

Lack of affordable childcare has come up as a barrier to families again and again, from the statistics we examined to the stories we heard about how much faster people could have achieved their goals toward self-sufficiency if they had childcare. One mother shared that she delayed taking an ESL class for five years because she didn't have childcare. Organizations from schools to employers have identified this issue. We need to bring all sectors together to find new models for providing a dramatic increase in safe, affordable childcare.

We endorse the efforts of the SAIL community impact partnership funded by United Way and the work of ASSETS to create support systems for existing, small childcare providers to help them share resources and ideas as well as create opportunities to access capital and grow. This should include changes in the business model (at the grassroots level and in mandated policy) that would allow for more growth and reduced costs while maintaining safety and quality. SDOL is willing to provide additional support to existing or new child care providers on how to meet state criteria to be licensed/certified.

Venture Philanthropy

The Lancaster County Community Foundation, through grant opportunities like their "Ah-Ha" grants and others, have shown a courageous willingness to invest in innovations that could be game changers, or fail (and thus learn from the failure). This willingness to fail for the greater good in the laboratory of community improvement

through philanthropic risk-taking is essential to the cause of advancement in the social service sector. Risk aversion maintains the status quo. More funders, business leaders, politicians and nonprofit leaders are going to need to be courageous when it comes to the aligned goals laid out in this plan if we're ever going to reach them.

Community Organizing and Leadership Development

People are too disconnected from each other and there is often a void in grassroots leadership at the neighborhood level in the City. Despite that, it has been proven in places like the Harlem Children's Zone and Washington State's Self-Healing Communities that sustainable progress happens when residents take an active role in all aspects of community development and anti-poverty work: planning, prioritizing, implementing, assessing, adjusting and advocating.

If we are going to create sustainable change, it must be driven by and owned by community residents. Investing in their work will yield exponential results that will eventually become the fabric of the community and reduce other community costs driven by crime, health disparities or other environmental factors. Those cost savings can eventually be reinvested in other areas of community and economic development.

We need to develop people, and allow them to guide how their neighborhoods are developed. To that end, CAP is partnering with the Lancaster City Alliance and the Lancaster County Community Foundation to create paid Block Captain positions who are charged with organizing residents in the "hot spots" of various neighborhoods. This would include regular neighborhood meetings and block events focused on cultivating and developing

neighborhood leadership as well as creating and implementing grassroots solutions to neighborhood challenges. This effort will be coordinated closely with the new CDC outlined in this plan.

Lancaster Prosperity Center

We know that the inconsistency of monthly incomes for people living in poverty is often as big, if not a bigger problem than having a low annual income. People living in poverty are often without the skill sets needed to shield themselves from the periodic dips that come with seasonal or inconsistent work. We also know that just getting a higher paying job does not necessarily mean that a person who has been living in poverty will adjust to more long-term financial habits. For those reasons, we support the ongoing efforts of Tabor Community Services and the United Way of Lancaster County to create a Prosperity Center to help residents create wealth and manage monthly income instability / inconsistency.

Democracy Collaborative Jobs Model

We know that there need to be more good jobs in the southern part of the City. That same part of the City also needs improved housing stock, lower rents and a reduction of blight. Data and surveys show that part of the disconnect between existing living wage job openings and the unemployed and under-employed comes from minimum basic skills requirements (basic math, punctuality, language skills), the lack of transportation to reach those jobs that are outside of the City, and barriers like a criminal record.

If we target disparity hot spots with solutions that address all of the above, we create the opportunity for greater impacts than traditional interventions achieve. Our work can, and should, achieve

exponential results in order to be different than status quo efforts of the past.

CAP is in the process of creating a home rehabilitation, lead remediation, landscaping/snow removal team in partnership with the City of Lancaster, LHOP, LGH, Tabor, ASSETS, Tec Centro, Thaddeus Stevens College and the High Companies. People with barriers to employment, including criminal records, will be trained to do meaningful work in the neighborhoods where they live. They will earn enough to someday purchase the very homes they're rehabilitating.

These employees will be provided with social supports as well as budgeting classes. If they would like to move on, the High Companies can provide them with even higher wage jobs with on the job training in fields like welding, or ASSETS can provide them with small business training and access to capital if they'd like to start their own business.

This project is following the example set out by the Democracy Collaborative in creating broad-based ownership models for new, city-based businesses that hire people struggling with poverty and pay them living and thriving wages and provide them with health benefits. This sustainable model is thriving in places like Cleveland, New York, California and Washington, and could work here as well with the right level of community buy-in. One example would be the neighborhood-based, employee-owned laundry business that provides contracted laundry service to the Cleveland Clinic, essentially providing budget-neutral economic development to an impoverished neighborhood.

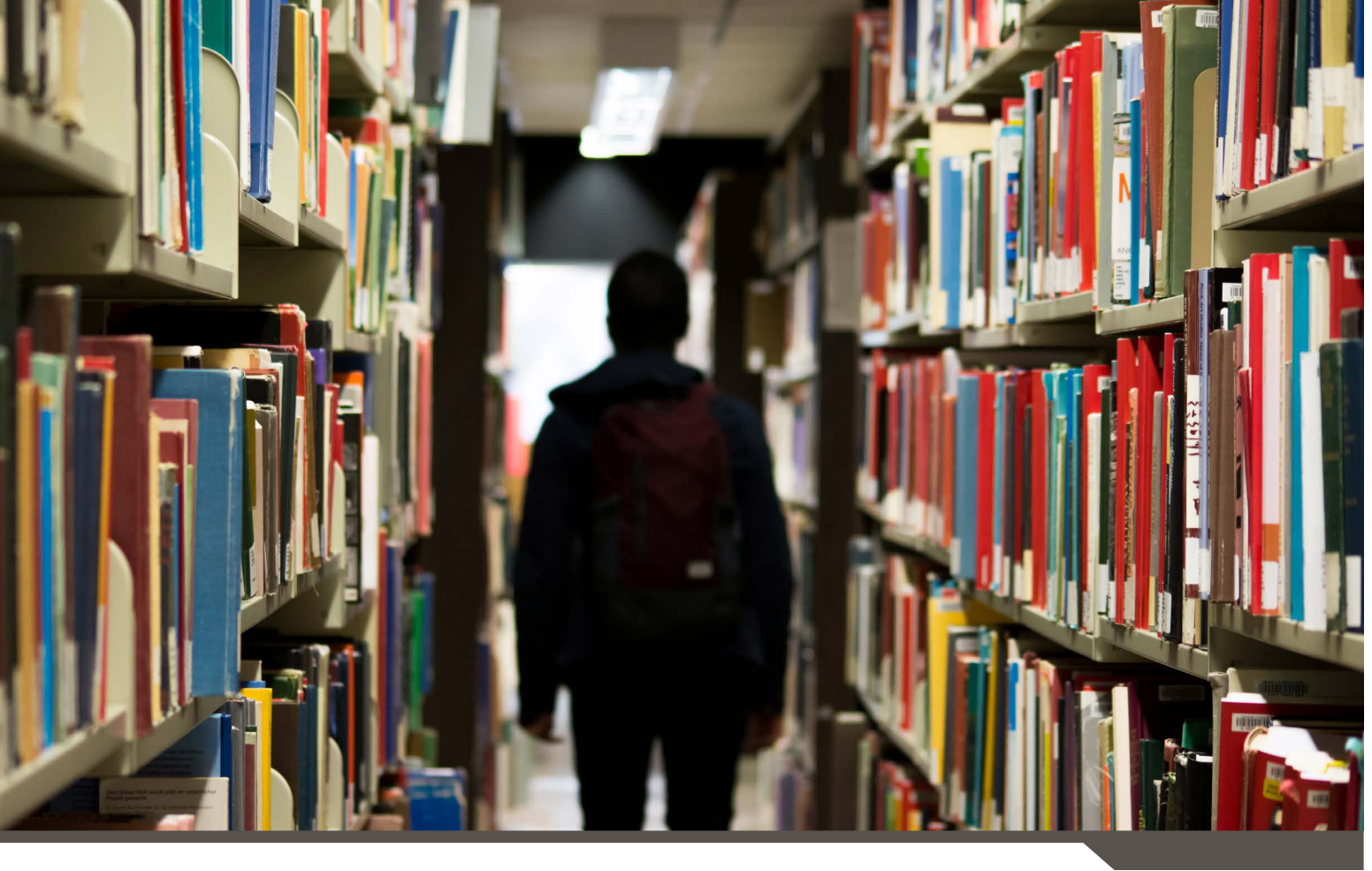
The Power of the Private Sector

We also know that US Charitable contributions each year amount to approximately the same amount

as restaurant revenue. To us, this indicates the extreme power of the private sector in addressing poverty in Lancaster - which eclipses the power of the nonprofit and government sectors.

Local social enterprises like The Lancaster Food Company, the Stroopie Company and Revolution, among others, represent a for-profit, private-sector commitment to creating and sustaining supportive jobs for those who need them most.

Lastly, growing numbers of Lancaster businesses are assessing their social and environmental impact and achieving B Corp certification, which sets an international standard for transparency and impact. Most recent local businesses to achieve B Corp certification include Two Dudes Painting Company and the Stroopie Company.



THE APPROACH

Throughout the course of our work, we examined poverty plans from eleven other communities, including some that had been in the implementation phase for years with solid outcomes to show for it. Some created government offices to facilitate implementation and others created community entities. In weighing our options, we ultimately chose a community-based coalition that would not create a new government agency or nonprofit, but would leverage all the strength, innovation and momentum already evident in Lancaster County.

Specifically, we were impressed with the Robert

Wood Johnson Foundation report “Self-Healing Communities” (June, 2016), which highlighted several significant outcomes from communities in Washington State. They defined the partnerships they created in the following way:

Funders, subject matter experts, and community members are partners who work in concert to support culture change. Partners each work in their own sphere of influence, and together their insights and abilities link and leverage efforts to galvanize connectivity and achieve unity of purpose and effort.

They went on to explain:

Because lasting culture change requires the community to embrace new ways of thinking and behaving, change must be centered on the community. Diverse community members—those most affected by adversity; those committed to improving the lives of children and families; and those ready and willing to offer resources that will support small, iterative layers of change—must engage in hopeful, creative dialogue about how they want things to change, and then begin and sustain the process with small changes that will build into larger transformations.

In following this example our Commission has chosen to create the Lancaster Coalition to Combat Poverty to ensure that not only is this plan implemented, but that it continues to evolve based on the needs and recommendations brought forward by community members and their representatives. The structure of this Coalition was determined by multiple best practices, the priorities identified by the Commission, and multiple efforts not to reinvent or compete with existing groups addressing key issues. Like the strategies themselves, this structure too should continue to evolve over time to meet community needs.

Steering Committee

The Steering Committee shall be chaired by the chief executive of a “backbone” agency as laid out in Stanford’s guidelines for the Collective Impact framework. The Commission has asked the Executive Director of the Lancaster County Coalition to End Homelessness (LCCEH) due to her organization’s ability to facilitate a county-wide collective impact model that has become a national best practice by helping Lancaster become the

first community in the United States to bring both chronic and veteran’s homelessness to functional zero.

The remainder of the Steering Committee shall be composed of the chairs of each Action Team described below, as well as four representatives to be elected by existing resident groups in the North West and North East (facilitated by the Lancaster City Alliance), the South West (facilitated by the Lancaster Housing Opportunity Partnership), and the South East (facilitated by the Spanish American Civic Association) who will collectively make up our Citizens Advisory Council. The Chair may also elect to appoint as many as four additional Steering Committee members as “at large” members to address key strategies or needs within the community.

Within the Steering Committee, an Executive Committee shall be populated by the Steering Committee chair as well as the chairs of the Community Development Action Team, the Education Action Team and the Policy Action Team as well as one of the four community representatives. The Executive Committee shall be empowered to meet and to act when swift action is required between the regular, quarterly meetings of the full Steering Committee.

Citizens Advisory Council

To ensure that residents living in the census tracts most affected by poverty have a voice in the process, we will be asking existing civic and community groups in the North West, South West, North East and South East to participate in ongoing strategic discussions, participate in an annual community summit to address anti-poverty efforts and send representation to the Coalition Steering Committee.

This Council will bring together members of the South West Steering Committee, The Elm Street Advisory Council, and the Lancaster City Alliance.

Community Development Action Team

CAP Housing is an existing 501(c)(3) organization that has been inactive for years. Rather than begin a new nonprofit to perform the function of a traditional Community Development Corporation (CDC), the Commission has chosen to endorse the repurposing of CAP Housing as this new CDC. The organization will have a county-wide service area, but with a strategic focus on the south side of the City of Lancaster. CDC's are defined in the following way by the Democracy Collaborative:

Community Development Corporations (CDCs) are nonprofit, community-based organizations focused on revitalizing the areas in which they are located, typically low-income, underserved neighborhoods that have experienced significant disinvestment. While they are most commonly celebrated for developing affordable housing, they are usually involved in a range of initiatives critical to community health such as economic development, sanitation, streetscaping, and neighborhood planning projects, and oftentimes even provide education and social services to neighborhood residents.

CDCs play a critical role in building community wealth for several key reasons:

- *They anchor capital in communities by developing residential and commercial property, ranging from affordable housing to shopping centers and even businesses*
- *At least one-third of a CDC's board is typically composed of community residents, allowing for*

the possibility of direct, grass-roots participation in decision-making

- *CDCs' work to enhance community conditions oftentimes involves neighborhood organizing, a process critical for empowering residents and gaining political power*

In the case of this new CDC, it will strive to not become a competitor for existing organizations already providing community and economic development for the south side. To that end, it's new Board currently consists of the chief executives of the Spanish American Civic Association, Lancaster Housing Opportunity Partnership, ASSETS, Lancaster County Coalition to End Homelessness, Lancaster County Workforce Development Board, Lancaster City Alliance, and the Community Action Partnership as well as community residents and representatives from Lancaster General Health and Fulton Bank.

Education Action Team

If one good job for each adult in Lancaster is our goal, then education will be key to our ability to reach that goal. Building upon multiple best practices from the Lumina Foundation's 75 Cities Initiative and Goal 2025, we will build an education bridge that spans from working with expectant mothers to prepare them to be their child's first teacher to that child's postsecondary completion. To accomplish that will require bringing together all the providers who serve every phase of a student's life. The action team will be comprised of the chairs of its various subcommittees along with representatives from the Lancaster Chamber of Commerce and Industry and the Lancaster County Workforce Development Board. The Education Action team will include members with expertise in each of the following educational stages:

- First Years – Prenatal care providers and programs that serve children from birth to three and their parents
- Pre-K – Pre-K and childcare providers
- Elementary School – Schools, mentorship and afterschool programs
- Middle School - Schools, mentorship and afterschool programs
- High School - Schools, mentorship and afterschool programs, college preparatory programs, scholarship and financial aid programs
- Postsecondary – Colleges, trade schools and apprenticeship programs

Policy Action Team

The Lancaster Coalition to Combat Poverty will be composed of citizens, legislators, workers in the helping professions, and agency directors, representing our community. With this credibility comes the responsibility to advocate for systemic changes that will advantage those seeking self-sufficiency.

This team shall be composed of elected officials, scholars, advocates, community organizers and activists with the purpose of creating policies that reduce poverty and eliminating or changing policies that perpetuate poverty.

Private Sector Action Team

The Commission believes that a moderate increase in the minimum wage would be a benefit to many county workers, but that a change in the legal wage

floor is insufficient. Part of overcoming poverty in Lancaster will be culture change. Our community should be aware of and support those employers who pay a living wage and take responsibility for their communities to encourage more such development.

This team shall be composed of various business and community interests with the purpose of campaigning for more family-sustaining jobs in our community. This focus shall include working to increase the minimum wage, promote employers who pay a living wage, promote the creation and certification of more B-Corp businesses, and promote the development of more locally-owned small and micro businesses. This would include support for companies interested in transitioning to employee ownership models.

Housing Action Team

Given the housing demands of Lancaster City and County, which will only increase in the coming years, sustained co-ordinated action is needed to ensure that affordable, quality housing is available for all Lancaster residents – a significant challenge. The role of this action team shall be filled by an existing group, the Coalition for Sustainable Housing, given their significant efforts toward this goal, as well as their work in South West Lancaster City.

Food Security Action Team

The Commission sees hunger and food insecurity as largely being downstream symptoms of poverty, resulting from isolation and a lack of resources. However, the path to achieving gainful employment for all households in our community is a long one, and hunger is immediate. It must be confronted in a way that addresses material needs and looks to

support families on the path to self-sufficiency. The role of this action team shall be filled by an existing group, Hunger Free Lancaster County.

Communications Action Team

In a community with a massive network of nonprofits and other agencies devoted to helping, the Commission has noted that many programs hamstring themselves by failing to centralize communication and messaging in their implementation, and many funders traditionally exclude these efforts from their support. The Coalition to Combat Poverty will not make this mistake.

This action team shall be filled by members of professional PR and communications firms as well as communications professionals from the public and nonprofit sectors. Their role shall be to use sophisticated, 21st century strategies and tools to communicate the work and progress of the Coalition as well as tell the stories of families working to improve their lives and their communities.

Data Analysis Action Team

To measure success, and to maintain accountability to our goals, an ongoing process of data collection, program evaluation, and gap analysis will be necessary. The Commission believes that future anti-poverty efforts can find success by prioritizing quantitative and qualitative methods to most effectively target their interventions.

This action team shall be comprised of scholars, researchers, grant writers and interns. Their role shall be the ongoing evaluation of data collection methods, analysis of collected data, and continued

awareness of best practices and anti-poverty innovations from across the nation.

FUNDING

There were multiple voices within our work groups asking where the money was going to come from to pay for everything we're trying to accomplish. We have two main points to make before we answer that question.

First, our community, like communities across this country, has invested huge sums of money in anti-poverty efforts over the past five decades. That money has been invested in a system of competitors that operate in silos. Often, these silos are created by our funding sources themselves.

Look at the War on Poverty as a case in point. In his 1968 RNC acceptance speech, Richard Nixon promised to end "pouring billions of dollars into programs that have failed in the United States of America," and by extension the Office of Economic Opportunity which had been directly funding grassroots, community-led, place-based strategies to reduce poverty. How they failed, we'll never know. The Office of Economic Opportunity only became funded in 1966, and two years is hardly long enough to know whether long-term poverty reduction efforts are working.

In 1969, when he became President, Nixon appointed Donald Rumsfeld and Dick Cheney to head up the Office of Economic Empowerment. Rumsfeld and Cheney immediately began assigning different programs created through the Office's previous efforts to existing bureaucracies within the Federal Government. By 1975, there was no longer an Office of Economic Opportunity. The effect was nearly fifty years of siloed efforts buried

in those separate bureaucracies with no flexibility, no coordinated strategies and no local decision making. This is, in fact, still our system today. Nonprofits that see each other as competitors do not share resources, data or strategies. They shut each other out in favor of their own self interests. While we have plenty of stories of helping individuals who are struggling, this is one of the core reasons our community indicators continue to get worse.

So our first point is that there is already significant funding currently being spent on anti-poverty efforts. It is our finding that it is often not spent on strategically coordinated efforts that are community-led and place-based. It is also not always invested in strategies that create the kind of community level changes that are sustainable and would lead to a decreased need for funding over time.

Our second point is, like with our anti-poverty strategies, there has sometimes been a difference of opinion of what is cause and what is effect. In focusing primarily on funding, those voices are assuming that funding will yield results. It is the ultimate contention of this Commission that the opposite is true: results will yield funding.

We have chosen to focus on strategies that we believe in and that have evidence to support their ability to succeed in Lancaster. We have chosen to build a coalition based on a shared philosophy and theory of change, rather than funding. Past efforts, which were often brought together by funding opportunities like Weed and Seed, did not survive the end of their funding periods. When the funding was gone, so were the partnerships.

We were not called together as a Commission because of the promise of funding, but because of

our shared responsibility for both the strength and vulnerability in our community. We will therefore move forward on the strength of that shared responsibility, and work together to attract funding for efforts that work, not for our separate interests, but for our shared interest in reducing poverty.

FUNDING STRATEGIES -

Funding Strategy 1 - Existing Funding

In addition to \$300,000 already in the bank at CAP Housing, which will be converted into a free-standing CDC, our many partners already have significant funding dedicated to reducing poverty and its effects. It is our assertion that bringing these sources and the efforts they fund together strategically and in new ways will increase outcomes without an increase in funding.

Funding Strategy 2 – Increase in Local Investment

We believe there are multiple ways for City, County and private funding to fund results in such a way as to not only reduce the burden of public assistance programs and property taxes, but to eventually reduce the need for future funding of these kinds of community interventions. Here are our recommendations.

Funding Strategy 2.1 – Advocate with our policy makers at the state level to allow the City the option to raise revenue in different ways specifically for the purpose of investing in community and economic development strategies that reduce poverty as laid out in this plan and future strategies of the Coalition.

Funding Strategy 2.2 – The City has already included a CAP initiative to hire City residents with

barriers to employment and train them to complete housing rehabilitation and lead remediation projects as a part of its \$1.3 million HUD grant. The City should continue to prioritize this and other Coalition endorsed projects when making funding decisions with its Home Grant, Land Bank and other funding / support mechanisms.

Funding Strategy 2.3 – Before endorsing or supporting any projects in impoverished neighborhoods, the City and the County should consult with the Coalition to ensure that those plans have been vetted in the context of the Coalition’s ongoing anti-poverty efforts. This would include vetting by residents of the neighborhoods affected.

Funding Strategy 2.4 – The County should look for ways to raise revenue and redirect existing funding sources that can be invested in the kind of evidence-based, economic development and housing strategies laid out in this plan, not only in the City, but in other impoverished and at-risk communities throughout the County. As stated earlier, over two thirds of the County’s impoverished residents live outside of the City, as do most employment opportunities that could lift a family out of poverty.

Funding Strategy 2.5 – The United Way, Lancaster County Community Foundation, Steinman Foundation and other local funders should work collaboratively and strategically to strengthen and enhance the efforts of the Coalition. The Commission is recommending a collective impact approach from our funders that would mirror the multi-layered, collective impact approach underway from so many of our nonprofits.

Funding Strategy 2.6 - The County, the City, and local private funders should recognize the broad experience and reputations of the stakeholders supporting the solutions herein, and prioritize

funding projects occurring as a result of this plan, specifically.

Funding Strategy 3 – Increase in outside investment

There are multiple regional, statewide and national funders who are interested in investing in innovation and solutions that work. Lumina, Kresge, and Robert Wood Johnson come to mind immediately. The kind of coordinated effort the Coalition is planning will put these kind of funders in play, and it is our intention to actively seek their investment.

Funding Strategy 3.1 – Coalition members will strategically pursue six and seven figure funding sources that fit the strategies laid out within this plan and future strategies of the Coalition. While lead applicants will change based on the funding source and the projects for which applications are submitted, all applications will include equitable funding for all applicants involved in each effort in a way that puts results over self-interest.

Funding Strategy 3.2 - Banks and other funders who traditionally fund and invest in economic development, workforce development, housing and financial literacy should prioritize funding projects occurring as a result of this plan, specifically.



HOW IT SHOULD LOOK IN THE FUTURE

Jessica is a single mother with two children. She works very hard at two part time jobs with no benefits, but she keeps slipping behind a little more each month until she finally receives an eviction notice. She calls 211. In our current system, she'd be told that no one can help her until she's actually become homeless, and our story would end here with Jessica frustrated, angry and sad.

In the system this plan describes, 211 connects Jessica with a Navigator. The Navigator performs a CaseWorthy intake and assessment with her and the data system identifies multiple faith-based and social service programs for which she and her children qualify. They receive food from the Council of Churches, childcare options and help with some utilities bills that are overdue. None of those will help with her eviction issue because it hasn't happened yet, but they'll save her a couple of hundred dollars per month.

By working with our new CDC, the Navigator will get Jessica into a new, CDC managed, affordable apartment. Her rent will go down by \$300 per month. Because of the quality, her new apartment

won't irritate her daughter's asthma like the last apartment, which was owned by an absentee landlord. They also become patients at SouthEast Lancaster Health Services to stay ahead of the asthma and avoid expensive ER visits. Since her new apartment is part of the resident-owned model, Jessica's rent payments now increase the income of one of her neighbors in the Southeast and contribute to the CDC purchasing and rehabbing other blighted properties.

Once things are stabilized, the Navigator begins to work with Jessica on examining her dreams for herself and her children. Her children are connected with programs at the YWCA and the Boys and Girls Club. Her older child receives a middle school mentor from Compass Mark that will eventually lead to high school mentorship through the Atollo college access program. The Navigator also begins helping Jessica build a circle of support made up of positive family and friends who help her build a goal plan.

Jessica's dream was always to be a doctor. Given her situation, she knows she can't do that right now, but she and her Navigator discuss becoming a Registered Nurse as part of her goal plan. Through a local church, they find an RN who is willing to join Jessica's circle of support as an ally. They break it down to concrete, realistic steps that they'll track monthly through the CaseWorthy system, and share with other service providers so they know how they fit in Jessica's plan and what else she needs to reach the finish line.

The Navigator helps Jessica get into the CNA program at Tec Centro. There's a long waiting list, but because Jessica is in holistic care and has a goal plan, she's moved into the very next class. In our current system, she would be told she'd have to wait six months, by which time our story might well

end again. Instead, her momentum is maintained and she finishes the class, leaning on her circle of support for encouragement and extra help when she needs it.

After graduation, Jessica is connected to a full time job with benefits at LGH that also has a tuition reimbursement program to help her continue her studies toward becoming an RN. Even with a full time job and class, Jessica has more time for her kids than when she had two part time jobs and had to take the bus to both. She finds she can now help with their homework and cook healthy meals more often. She can take an interest and knows what's happening in their lives.

Once she's settled in her new job, the Navigator connects Jessica to financial literacy programs at Tabor Community Services so she can better manage her new income. As a result of her budgeting classes, her steady and rising income, and the encouragement of her circle of support, Jessica also decides to add buying a home to her goal plan.

The Navigator connects Jessica to LHOP's first time home buyer course. As she saves for a house, both LHOP and Tabor match her down payment savings. Eventually, she saves enough to buy a home that has been financed by LHOP and rehabbed by CAP's home rehab team. As a result, her purchase supports paid, on the job construction training for south side residents with barriers to employment (which lead to thriving wage jobs at the High Companies) and provide capital for LHOP to purchase and rehab another blighted property.

The neighborhood that Jessica is moving into has been served by a block captain for two years. The Lancaster City Alliance has worked with that block captain to reduce garbage on the streets and build



connections between neighbors. A neighborhood watch is a part of these efforts, all of which have reduced crime, making it more attractive for local entrepreneurs who have been setting up shop thanks to ASSETS and the Community First Fund. This new life and hope in the neighborhood has attracted more people like Jessica.

As Jessica graduates from nursing school, continues to build equity in her home, and establishes deeper connections in her community, she no longer needs a Navigator (who is still only a phone call away on a bad day). She has a living wage, natural unpaid supports, and a plan for herself. Her children have plans that go beyond high school. She's a thriving member of, and a leader in, a neighborhood that also has a plan.

While all of this has been happening, the Policy Action Team of the Lancaster Coalition to Combat Poverty has joined with other cities representatives to advocate in Harrisburg and Washington D.C. for policy changes in support programs that no longer dis-incentivize work. Because of that advocacy work, which included nonprofits, private businesses and local government, Jessica wasn't financially punished for seeking self-sufficiency and a better

life. This action team also got the State to move closer to adopting universal Pre-K.

At the same time, the Education Action Team created better connectivity between schools and mentoring programs so Jessica's children would have a clear path to postsecondary completion. The Data Analysis Action Team made sure that the promised results were there as the Coalition did its work. When they weren't, the Team made sure that the strategy pivoted accordingly. Meanwhile, the Communications Action Team made sure that the community as a whole had a better understanding of who people like Jessica are, what goals they are reaching, and how hard they work to get there.

It's complicated. There will be steps backwards and hard days. It will take years and deep relationships, but that's how this works. There aren't short cuts and silver bullets. There's just difficult, but meaningful work within a hyper-connected, responsive, highly strategic, person-centered, relational system that focuses on the individual in parallel with the community as a whole. That is our plan. It's all about what one good job can do for a family, and, in turn, for our city.

THE INDICATORS

	Year 1	Year 5	Year 10	Year 15
Living Wage Employment	50 families connected	700 families connected	1700 families connected	3000 families connected
Pre-K Access	20% access	35% access	65% access	100% access
Post-Secondary Completion	26% completion rate	34% completion rate	46.5% completion rate	66.5% completion rate
Affordable Rentals	4 properties	12 properties	34 properties	60 properties
New Homeowners	5 properties	27 properties	61 properties	100 properties
Block Captains	3	10	15	20
New Neighborhood Groups	1	3	5	7

The Mayor’s Commission to Combat Poverty felt it was important that our progress on poverty interventions, as well as poverty in general, be tracked over the next 15 years. To that end, we identified 5 indicators and 1, 5, 10, and 15-year goals. We believe that if we can meet these goals moving forward, we will ultimately achieve success in reducing poverty in Lancaster City by 2032, as well as reversing the trend of poverty in Lancaster County.

In the area of workforce, our primary focus, we recommend tracking the number of families our efforts connect to higher than poverty wages with an emphasis on living-wage employment. Our 15-year goal is to connect 3000 such families. With Lancaster City families in poverty having an average household size of 4.14, connecting each of these families, each if we lose one-third of such families to

attrition or families choosing to move out of the city, we can still reduce the number of people in poverty by 8000, more than half the current figure of 15,816. In the area of education, in keeping with our previously stated goals, we recommend tracking learners at both ends of the educational system. We seek to improve pre-k access. Currently, 17% of Lancaster County children living below 300% of poverty have access to publicly funded pre-K. Both additional funding, and the development of new capacity in the form of classrooms and teachers will be required to reach our 15-year goal of 100% access for such children.

Pennsylvania is below the national average for the percentage of jobs which will require post-secondary qualifications as we move into the future.¹ We looked beyond the 2025 goal to align with our other goals. With collaboration from our

community's post-secondary institutions, we firmly believe we can increase the percent of adults with some form of post-secondary degree to 66.5% by 2032.

In the area of housing, we aim to create a new standard for affordable housing in the city and homeownership throughout the county. Through the new community development corporation, our goal is acquire 60 rental properties, ensure that they meet certain quality standards, and make them available for low-income families by 2032. Our intent goes beyond simply offering housing to disrupting the pattern of absentee landlords in Lancaster's concentrated poverty areas by raising the bar on affordable housing.

Over the same time period, our goal is to acquire and rehabilitate 100 homes to help low-income families achieve homeownership and build generational wealth.

ACCOUNTABILITY MATRIX

FOCUS	STRATEGY	ACTION ITEM	ACCOUNTABILITY
WORKFORCE			
	Workforce Strategy 1: Equip heads of household with the necessary skills and training to command living-wage employment	Work beyond the restrictions of WDB funding to replicate evidence-based models like those of the Democracy Collaborative i.e. employee-owned businesses, specialized employee placement, on-site training, and wraparound support services for employees	Lancaster Coalition to Combat Poverty, CDC, SACA, CAP, Workforce Development Board, ASSETS, SDOL
		Conduct gap analysis of the workforce system in Lancaster county indicating usage levels, demographics, outcomes, funding streams, capacity and priority given to those in poverty	Coalition Data Committee, Workforce Development Board, Chamber of Commerce
		Increase access to short-term skill training and literacy programs and align workforce/post-secondary offerings with workforce demands and trends	SACA, IU13, Workforce Development Board
		Advocate with State Department of Labor and Department of Public Welfare to remove regulatory burdens to improve the system	Policy Action Team, Workforce Development Board, City Government, County Commissioners, Chamber of Commerce
		Create an immersive English language class for residents from other countries with postsecondary credentials to get them connected to living wage employment as quickly as possible & advocate for a statewide fast-track recertification	SACA, IU13, CDC
	Workforce Strategy 2: align legal structures, employer culture, and support for new small businesses to create a real path to self-sufficiency.	Advocate for smoothly-tiered, appropriately funded childcare subsidy & alignment of all government assistance programs to eliminate cliff effect.	Policy Action Team, Workforce Development Board, City Government, County Commissioners, Chamber of Commerce
		Create an education campaign and certification to encourage employers to pursue sustainable wage and hiring practices and community responsibility, setting standard for local businesses	ASSETS, Chamber of Commerce, Private Sector Action Team
		Reach parity in business ownership by women and people of color.	ASSETS, SACA, Chamber of Commerce, The Entrepreneurial Coalition

FOCUS	STRATEGY	ACTION ITEM	ACCOUNTABILITY
EDUCATION			
	Education Strategy 1: enhance and expand quality, early education, Pre-K and childcare offerings in Lancaster County.	Establish system making high-quality, evidence-based Pre-K available and affordable for all families	Pre-K for PA, United Way, Education Action Team, SDOL
		Provide training and support for those seeking to start, expand or improve existing childcare centers & align evidence-based standards for childcare throughout community using the United Way-funded SAIL model	Education Action Team, United Way, CAP
		Develop programs to empower current and future parents to create healthy home learning environments for children and expand existing programs that do so.	Education Action Team, United Way, SDOL, IU13, LGHealth
	Education Strategy 2: use community resources to equip, strengthen, and expand educational and supplemental offerings for elementary, middle, and high school students.	Expand community school model to more schools within the School District of Lancaster and equip schools with all the programming needed in their neighborhood to strengthen residents and decrease poverty to include programs outside of the SDOL budget and resident-created and led programs.	SDOL, CAP, LGHealth, SACA, United Way, residents, Education Action Team, Lancaster Coalition to Combat Poverty
		Support and strengthen out-of-school programs that provide education, mentoring, and nutrition support for District students & align these programs with SDOL curriculum.	Exit Lancaster, The Mix at Arbor Place, Children Deserve a Chance, Central Penn Food Bank, School District of Lancaster, Crispus Attucks, Dig It!
	Education Strategy 3: structure education, pre-k through post-secondary, to increase connectivity with workforce needs and increase post-secondary completion using models proven by the Lumina Foundation's 75 Cities Initiative.	Create connectivity and warm hand-offs at every stage of the student's journey to ensure a clear and stable bridge to postsecondary completion.	SDOL, Pre-K for PA, CAP, HACC, Thaddeus Stevens, Millersville University, Franklin & Marshall University, Education Action Team
		Increase communication and coordination between secondary education providers, post-secondary providers, and workforce stakeholders. Link post-secondary goals to future living-wage workforce opportunities.	SDOL, IU13, HACC, Thaddeus Stevens, Millersville University, Franklin & Marshall University, Chamber of Commerce, Workforce Development Board, Education Action Team

FOCUS	STRATEGY	ACTION ITEM	ACCOUNTABILITY
HOUSING			
	Housing Strategy 1: Increase Homeownership County-Wide	Create more opportunities for residents of impoverished areas to purchase homes both in the city and in other Lancaster County municipalities close to where they work to lower housing costs, build assets and end transportation problems.	CDC, LHOP, SACA, Housing Action Team, County Commissioners, Chamber of Commerce
		Encourage and support other large employers in Lancaster County to assist their employees in securing housing near their work site (like LGHealth and F&M model).	Policy Action Team, Private Sector Action Team, Housing Action Team, Chamber of Commerce
	Housing Strategy 2: Improve Affordable Renting Environment	Establish community development corporation to act as scattered site non-profit landlord, setting bar for keeping rents affordable and quality high, and supporting faith-based and private landlords doing likewise (including developing models that allow residents to become landlords in their own neighborhoods).	CAP, LHOP, SACA, Council of Churches, residents, ASSETS, LCCEH, LGHealth, City Alliance, WDB
		Work with municipalities county-wide to decrease regulatory barriers to affordable housing development	LHOP, County Commissioners, Housing Action Team, Policy Action Team, ASSETS, Community First Fund
		Develop opportunities to build or renovate properties so there are small business spaces on the first floor with affordable housing opportunities above	CDC, City Government (Land Bank), ASSETS

FOCUS	STRATEGY	ACTION ITEM	ACCOUNTABILITY
COMMUNITY			
	Community Strategy 1: Develop human and institutional resources in Lancaster's impoverished neighborhoods	Develop a macro community development corporation in the city of Lancaster, composed of already-engaged non-profit agencies which serve in place of staff/departments, to bring separate economic, housing and community development interests together with a County-wide mission and an initial strategic focus in the City of Lancaster.	Lancaster Coalition to Combat Poverty, CAP, SACA, LHOP, ASSETS, LCCEH, LGHealth, City Alliance, WDB
		Identify and develop potential leaders in Lancaster's Southeast and Southwest quadrants, and provide these "community organizers" with support and funding to advance neighborhood priorities.	CAP (Block CAPtains), LHOP, SACA, Citizens Advisory Council, residents
		Combine all efforts within impoverished communities with voter registration and turnout efforts. Make voter registration available to those eligible with all service provision.	Policy Action Team, Steering Committee, SACA, CAP
	Community Strategy 2: Assess gaps, assets, and demographic trends across Lancaster Community to guide current and future interventions	Conduct a public health research project to identify factors contributing to the current decline in teen pregnancy rates & lay out an intentional plan to accelerate this decline as well as replicate this success in existing single parent households.	Lancaster Coalition to Combat Poverty, Penn State Hershey, Data Action Team
		Work with existing stakeholders to identify and deconstruct ongoing needs in housing, hunger, homelessness, and other contributing/resultant elements of poverty.	Data Action Team, LHOP, Council of Churches, LCCEH, Hunger Free Lancaster

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Mayor's Commission to Combat Poverty

Tom Baldrige – Lancaster Chamber of Commerce and Industry
 Marlyn Barbosa – Tec Centro
 Jesus Condor – Habitat for Humanity
 Carlos Graupera – Spanish American Civic Association
 Ollie Jones – Cater MacRae (Retired)
 Dan Jurman, MAR – Community Action Partnership

Jessica King – ASSETS
 Jennifer Koppel – Lancaster County Coalition to End Homelessness
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ASSETS

Bright Side Baptist Church
Bright Side Opportunity Center
Café Centro
Center for Public Scholarship and Social Change at Millersville University
Central PA Food Bank
Children Deserve a Chance Foundation
Clipper Stadium
Community Action Partnership
Community First Fund
The Democracy Collaborative
Domino's Pizza - 798 New Holland Ave, Lancaster, PA
Ebenezer Baptist Church
Exit Lancaster
The Factory Ministries
F&M Works
Franklin and Marshall College
Giant Food Stores- 235 N. Reservoir Street, Lancaster, PA
Harrisburg Area Community College
Healthy Beginnings Plus
Iglesia Catolica San Juan Bautista
J. P. McCaskey High School
Lancaster Chamber of Commerce and Industry
Lancaster General Health
Lancaster Housing Opportunity Partnership
Lancaster-Lebanon IU13
Lancaster YWCA
The Mix at Arbor Place
Penn State Hershey College of Public Health
Pre-K for PA
Re-Entry Management Organization
Reynolds Middle School
School District of Lancaster
Southeast Lancaster Health Services
Spanish American Civic Association
Tec Centro
Thaddeus Stevens College
Thad Williamson (University of Richmond – Mayor's Anti-Poverty Commission)

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THE MAYOR'S
**COMMISSION TO
COMBAT** **POVERTY**





REPORT FOR CPD PROGRAM CDBG
 PGM YR 2024

Section 3 Total By Program	CDBG
Total Number of Activities	1
Total Labor Hours	2,958
Section 3 Worker Hours	0
Targeted Section 3 Worker Hours	0
Qualitative Efforts	
A Outreach efforts to generate job applicants who are Public Housing Targeted Workers	0
B Outreach efforts to generate job applicants who are Other Funding Targeted Workers	0
C Direct, on-the job training (including apprenticeships)	0
D Indirect training such as arranging for, contracting for, or paying tuition for, off-site training	1
E Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching)	0
F Outreach efforts to identify and secure bids from Section 3 business concerns	1
G Technical assistance to help Section 3 business concerns understand and bid on contracts	1
H Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns	0
I Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services	1
J Held one or more job fairs	0
K Provided or connected residents with supportive services that can provide direct services or referrals	0
L Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation	0
M Assisted residents with finding child care	0
N Assisted residents to apply for/or attend community college or a four year educational institution	0
O Assisted residents to apply for or attend vocational/technical training	0
P Assisted residents to obtain financial literacy training and/or coaching	0
Q Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns	0
R Provided or connected residents with training on computer use or online technologies	0
S Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses	0
T Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act	0
U Other	0



Section 3 Details By Program, Program Year & Activity

Program	Program Year	Field Office	Grantee	Activity ID	Activity Name	Qualitative Efforts - Other Effort Description	Total Labor Hours	S3 Worker Hours	S3W Benchmark Met (25%)	Targeted S3W Hours	Targeted S3W Benchmark Met (5%)	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U
CDBG	2024	PHILADELPHIA	LANCASTER	2114	2024 Place-based Streetscape Improvements		2,958	0	No	0	No				X	X	X		X													
CDBG	2024	Total for 2024					2,958	0	0	0	0	0	0	0	0	1	0	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0
CDBG	Total						2,958	0	0	0	0	0	0	0	0	1	0	1	1	0	1	0	0	0	0	0	0	0	0	0	0	

Legend

- A** Outreach efforts to generate job applicants who are Public Housing Targeted Workers
- B** Outreach efforts to generate job applicants who are Other Funding Targeted Workers.
- C** Direct, on-the job training (including apprenticeships).
- D** Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.
- E** Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).
- F** Outreach efforts to identify and secure bids from Section 3 business concerns.
- G** Technical assistance to help Section 3 business concerns understand and bid on contracts.
- H** Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.
- I** Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.
- J** Held one or more job fairs.
- K** Provided or connected residents with supportive services that can provide direct services or referrals.
- L** Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.
- M** Assisted residents with finding child care.
- N** Assisted residents to apply for/or attend community college or a four year educational institution.
- O** Assisted residents to apply for or attend vocational/technical training.
- P** Assisted residents to obtain financial literacy training and/or coaching.
- Q** Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.
- R** Provided or connected residents with training on computer use or online technologies.
- S** Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.
- T** Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.
- U** Other

Is Your Business a Section 3 Business?

Section 3 Resident:

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

Section 3 Business:

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

ATTACHMENT “A”
Lancaster, PA MSA
Income Limits – 2022

Median Family Income - \$90,200

Number of Persons in Family	Extremely Low Income Limits (\$)*	Very Low (50%) Income Limits (\$)	Low (80%) Income Limits (\$)
1	\$18,950	\$31,600	\$50,550
2	\$21,650	\$36,100	\$57,750
3	\$24,350	\$40,600	\$64,950
4	\$27,750	\$45,100	\$72,150
5	\$32,470	\$52,350	\$77,950
6	\$37,190	\$55,350	\$83,700
7	\$41,910	\$55,950	\$89,500
8	\$46,630	\$59,550	\$95,250

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

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

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

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

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

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

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

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

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

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

Signature:  Title: Construction Manager

Company Name: Doug Lamb Construction, Inc. Date: 2/25/2025

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

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

Total of All Hires: 0

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

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

ATTACHMENT "D"
SECTION 3 BUSINESS CONCERN CERTIFICATION

CITY OF LANCASTER

Project Title: 2024 ADA Curb Ramp Project


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

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

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

Name of Firm: Doug Lamb Construction, Inc.

Address: 1180 Zeager Road, Elizabethtown, PA 17022

Signature: 

Title: Construction Manager

Date Signed: 2/25/2025

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

Project Title:

Contractor Name and Address:

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

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

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

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

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

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

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

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

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

Block F: Enter the number of Section 3 Trainees

Part II: Contracts Awarded Cumulative to Date

1. Construction Contracts:

A. Total amount of all contracts over \$100,000.00 awarded on this project: \$ 0.00

B. Total dollar amount of contracts awarded to Section 3 Businesses: \$ \$ 0.00

C. Percentage of the total dollar amount that was awarded to Section 3 Businesses 0%

D. Total Number of Section 3 Businesses receiving contracts: 0

Part III: Summary – Cumulative to Date:

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

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

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

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

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

Other, describe on additional attached pages.

NOTE:

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



REPORT FOR CPD PROGRAM CDBG
 PGM YR 2024

Section 3 Total By Program		CDBG
Total Number of Activities		1
Total Labor Hours		2,958
Section 3 Worker Hours		0
Targeted Section 3 Worker Hours		0
Qualitative Efforts		
A Outreach efforts to generate job applicants who are Public Housing Targeted Workers		0
B Outreach efforts to generate job applicants who are Other Funding Targeted Workers		0
C Direct, on-the job training (including apprenticeships)		0
D Indirect training such as arranging for, contracting for, or paying tuition for, off-site training		1
E Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching)		0
F Outreach efforts to identify and secure bids from Section 3 business concerns		1
G Technical assistance to help Section 3 business concerns understand and bid on contracts		1
H Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns		0
I Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services		1
J Held one or more job fairs		0
K Provided or connected residents with supportive services that can provide direct services or referrals		0
L Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation		0
M Assisted residents with finding child care		0
N Assisted residents to apply for/or attend community college or a four year educational institution		0
O Assisted residents to apply for or attend vocational/technical training		0
P Assisted residents to obtain financial literacy training and/or coaching		0
Q Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns		0
R Provided or connected residents with training on computer use or online technologies		0
S Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses		0
T Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act		0
U Other		0



U.S. Department of Housing and Urban Development
 Office of Community Planning and Development
 Integrated Disbursement and Information System
 Section 3 Report
 Grantee: LANCASTER

DATE: 03-17-25
 TIME: 9:25
 PAGE: 2

Section 3 Details By Program, Program Year & Activity

Program	Program Year	Field Office	Grantee	Activity ID	Activity Name	Qualitative Efforts - Other Effort Description	Total Labor Hours	S3 Worker Hours	S3W Benchmark Met (25%)	Targeted S3W Hours	Targeted S3W Benchmark Met (5%)	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U
CDBG	2024	PHILADELPHIA	LANCASTER	2114	2024 Place-based Streetscape Improvements		2,958	0	No	0	No				X	X	X		X													
CDBG	2024	Total for 2024					2,958	0	0	0	0	0	0	0	0	1	0	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0
CDBG	Total						2,958	0	0	0	0	0	0	0	0	1	0	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0

Legend

- A** Outreach efforts to generate job applicants who are Public Housing Targeted Workers
- B** Outreach efforts to generate job applicants who are Other Funding Targeted Workers.
- C** Direct, on-the job training (including apprenticeships).
- D** Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.
- E** Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).
- F** Outreach efforts to identify and secure bids from Section 3 business concerns.
- G** Technical assistance to help Section 3 business concerns understand and bid on contracts.
- H** Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.
- I** Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.
- J** Held one or more job fairs.
- K** Provided or connected residents with supportive services that can provide direct services or referrals.
- L** Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.
- M** Assisted residents with finding child care.
- N** Assisted residents to apply for/or attend community college or a four year educational institution.
- O** Assisted residents to apply for or attend vocational/technical training.
- P** Assisted residents to obtain financial literacy training and/or coaching.
- Q** Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.
- R** Provided or connected residents with training on computer use or online technologies.
- S** Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.
- T** Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.
- U** Other