Fiscal Year 2023 Annual Action Plan

Lancaster County, Pennsylvania

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



Annual Action Plan 2023

Executive Summary

AP-05 Executive Summary - 91.200(c), 91.220(b)

1. Introduction

The Annual Action Plan details the goals and objectives to be achieved and the activities to be funded using monies provided to the County of Lancaster, Pennsylvania by the U.S. Department of Housing and Urban Development through the Community Development Block Grant (CDBG) Program, HOME Investment Partnerships (HOME) Program, and Emergency Solutions Grant (ESG) Program. Combined, the CDBG, HOME, and ESG programs will help Lancaster County channel approximately \$5 million into infrastructure, the preservation and creation of affordable housing, and public facilities and services to benefit low- and moderate-income communities and residents during fiscal year 2023.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

Lancaster County will continue to follow previously implemented performance measurements prescribed by the U.S. Department of Housing and Urban Development. All activities funded will address one of these three primary objectives.

- 1. Create Suitable Living Environments
- 2. Provide Decent Affordable Housing
- 3. Create Economic Opportunities

Similarly, all funded activities will achieve one of the three following outcomes:

- 1. Improve Availability/Accessibility
- 2. Improve Affordability
- 3. Improve Sustainability

The following activities will be prioritized for support by CDBG, HOME, and ESG funds during 2023:

- Create decent affordable housing, both rental and owner-occupied.
- Rehabilitate existing units to maintain affordability, both rental and owner-occupied.

- Reduce the number of blighted properties;
- Promote fair housing;
- Support public infrastructure and facility improvements;
- Support borough revitalization efforts and economic development;
- Assist in the provision of housing services; and
- Provide support to support Housing First activities using rapid re-housing and shelter assistance.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The Redevelopment Authority has created these goals and projects based on the prior success of programs and activities that have produced decent affordable housing and created suitable living environments for the residents of Lancaster County, through improved availability or accessibility, affordability, and sustainability. With citizen feedback to determine goals and objectives, as part of the development of the 2021-2025 Consolidated Plan, and success in years one and two of the Consolidated Plan, the Redevelopment Authority will continue these projects and activities to meet the outlined goals and objectives. The Redevelopment Authority is prioritizing affordable housing creation and rehabilitation due to rising housing costs and lack of available units compared to demand.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Lancaster County has a Citizen Participation Plan that relies on citizen-based review panels to make funding recommendations to the Lancaster County Board of Commissioners. For public improvement projects, the citizen-based process uses a steering committee of municipal officials, both elected and appointed, as well as municipal staff, and engaged citizens to rank the projects based on the goals and objectives identified in the applicable Consolidated Plan. The committee then uses these rankings to make recommendations on funding for activities. The process for the review of multi-family affordable projects is similar, a committee is called together for project review when needed. Committee members have backgrounds in economic and community development, housing development, as well as expertise in municipal planning and zoning. For public service dollars devoted to homeless services, the Steering Committee of the Lancaster County Coalition to End Homelessness makes funding recommendations.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

A public meeting was held both virtually and in person on Thursday, April 20th at 3:00 pm, jointly with the City of Lancaster regarding their 2023 Annual Action Plan. One member of the public attended and asked for clarification regarding home repair programs and homelessness services for children and youth. Staff addressed comments and provided a fuller explanation of programs offered through CDBG for home repair programs, and services which are funded via ESG and Homelessness Coalition joint funding efforts which address children and youth homelessness.

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

Not applicable

7. Summary

PR-05 Lead & Responsible Agencies - 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

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

Agency Role		Name		Department/Agency
Lead Agency		LANCASTER COUNTY		
CDBG Administrator	LANCA	STER COUNTY	Redevelopme	nt Authority of the County of Lancaster
HOPWA Administrator				
HOME Administrator	LANCASTER COUNTY		Redevelopme	nt Authority of the County of Lancaster
ESG Administrator	LANCASTER COUNTY		Redevelopme	nt Authority of the County of Lancaster
HOPWA-C Administrator	LANCA	STER COUNTY	Redevelopme	nt Authority of the County of Lancaster

Table 1 – Responsible Agencies

Narrative

The Redevelopment Authority of the County of Lancaster is the lead agency for the County and is responsible for coordinating the consolidated planning and submission process. Lancaster County will be designated as the Lead Entity of the HOME Consortium it has formed with the City of Lancaster, and agrees to carry out such overall responsibilities, with cooperation of the City, in accordance with 24 CFR Part 92.101 Consortia. A cooperation agreement was entered into between Lancaster County and the City of Lancaster to form a HOME Consortium under the National Affordable Housing Act. The City and County have determined that joining together as a consortium to obtain funding under the HOME program increased their ability to provide affordable housing for the very low-, low- and moderate-income residents of the City and County. In addition, the Redevelopment Authority is also responsible for the administration of the Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG) programs covered by the Consolidated Plan.

Consolidated Plan Public Contact Information

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AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

The Redevelopment Authority of the County of Lancaster, on behalf of Lancaster County, consulted with many agencies, municipalities, housing developers, nonprofits, and service providers during the development of the Fiscal Year 2023 Annual Action Plan.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).

The Lancaster County Redevelopment Authority is a member of the Lancaster County Homelessness Coalition. The Coalition is comprised of over 60 partners representing faith-based organizations, housing providers, private and governmental health providers, mental health providers, and social services providers. Redevelopment Authority staff are active participants in the Coalition; The groups and committees frequently discuss initiatives to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness. These efforts enhance coordination to better serve the housing needs of Lancaster County residents.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The lead agency for the County's Continuum of Care, the Office for the Lancaster County Homelessness Coalition is now housed by the Lancaster County Redevelopment Authority's Department of Human Services. Staff of the Redevelopment Authority serve on the steering committee for the coalition.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The Lancaster County Redevelopment Authority partners with the City of Lancaster, the Lancaster County United Way and the Lancaster County Homelessness Coalition to create a joint pool of funding for applications for programs providing homeless services. The pool of funding comes from ESG, CDBG, State Homeless Assistance Program, United Way and some CoC dollars.

A request-for-proposals is publicized throughout the community and sent to all previous and potential partners. All programs that would be funded apply to this pool through a standardized application,

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which are evaluated by organizational and programmatic performance metrics, alignment with the area's strategic initiatives and cost effectiveness.

An Application review committee comprised of CoC Steering committee members and staff from all of the fundings sources review the applications. Funding recommendations are then provided to the CoC Steering Committee for their approval and then to the Lancaster County Redevelopment Board for final approval. Applicants are notified of funding awards, contract conditions and performance standards, followed by public notification thereof.

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated
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1	Agency/Group/Organization	Lancaster County Coalition to End Homelessness
	Agency/Group/Organization Type	Services-homeless Regional organization Grantee Department
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The coalition was consulted in person. Areas for improved coordination include increasing collaboration among providers in the field and improving communication. Some barriers to the work of the coalition which the authority is coordinating to overcome include increasing capacity through development of new facilities and increasing availability of affordable housing.
2	Agency/Group/Organization	YWCA
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Health Services - Victims

	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The YWCA was consulted virtually. Staff of the YWCA identified the following areas for improved coordination: data sharing and using the YWCA published County-Wide disparities to inform program management and services. YWCA staff noted that communication has improved over the past year, and that the facility has received a variety of support from the Authority and County for its housing programs.
3	Agency/Group/Organization	United Way of Lancaster County
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-Homeless Services-Health Services-Education Services-Education Services-Employment Services-Fair Housing Services - Victims Regional organization Foundation

What section of the Plan was addressed by	Homeless Needs - Chronically homeless
Consultation?	Homeless Needs - Families with children
	Homelessness Needs - Veterans
	Homelessness Needs - Unaccompanied youth
	Homelessness Strategy
	Non-Homeless Special Needs
	Anti-poverty Strategy
Briefly describe how the Agency/Group/Organization	The United Way was consulted by CoC staff, to enhance coordination with the
was consulted. What are the anticipated outcomes of	organization, UW staff suggested providing additional funding for the 211
the consultation or areas for improved coordination?	program and inviting them to more county-run meetings. They also proposed
	allowing 211 to do emergency intakes for emergency housing in the evening and
	on the weekends.
Agency/Group/Organization	COMMUNITY ACTION PARTNERSHIP OF LANCASTER COUNTY
Agency/Group/Organization Type	Services - Housing
	Services-Children
	Services-Elderly Persons
	Services-Persons with Disabilities
	Services-Victims of Domestic Violence
	Services-homeless
	Services-Education
	Services-Employment
	Services - Victims
What section of the Plan was addressed by	Housing Need Assessment
Consultation?	Homelessness Strategy
	Anti-poverty Strategy
	Consultation? Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? Agency/Group/Organization Agency/Group/Organization Type What section of the Plan was addressed by

	Consultation was performed via a meeting between Community Action
•	Partnership and CoC staff. During the meeting CAP staff indicated that they felt
the consultation or areas for improved coordination?	coordination was good and they have a positive experience when working with
	partners from county agencies, but stated that increasing the supply of affordable
	housing in the county should be a priority.
Agency/Group/Organization	Lancaster City Alliance
Agency/Group/Organization Type	Services - Housing
	Services-homeless
	Business and Civic Leaders
What section of the Plan was addressed by	Market Analysis
-	Economic Development
	Anti-poverty Strategy
	The president of the Lancaster City Alliance was consulted virtually. They
-	identified workforce development and housing as two of the biggest areas of need
the consultation or areas for improved coordination?	for Lancaster City and County, with a key issue of identifying one organization to
	be identified as the lead to build support around. Continued regular engagement
	and communication is needed to maintain and improve relationship.
Agency/Group/Organization	Spanish American Civic Association Development Corp (SACA)
Agency/Group/Organization Type	Services - Housing
	Services-Health
	Services-Employment
	Regional organization
	Civic Leaders
	Agency/Group/Organization Type What section of the Plan was addressed by Consultation? Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? Agency/Group/Organization

	What section of the Plan was addressed by	Housing Need Assessment
	Consultation?	Market Analysis
		Economic Development
		Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization	The president of SACA was consulted virtually. Housing and human (social)
	was consulted. What are the anticipated outcomes of	services were identified of key areas of need for the community, with suggestions
	the consultation or areas for improved coordination?	of increasing the level of communication and coordination across organizations to
		build capacity to address persistent problems and create a more efficient way to
		deliver services. A need for increased communication about a county-wide
		affordable housing strategy was also noted, current discussions focus mainly on
		the city.
		,
7	Agency/Group/Organization	Lancaster City Housing Authority
	Agency/Group/Organization Type	РНА
	What section of the Plan was addressed by	Housing Need Assessment
	Consultation?	Public Housing Needs
		Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization	The Lancaster City Housing Authority was consulted virtually. The City's PHA is the
	was consulted. What are the anticipated outcomes of	only provider of publicly owned and operated housing in the county as the
	the consultation or areas for improved coordination?	County's PHA does not own or manage any properties. There is an increased need
		for communication and collaboration between LCHA and the city and county
		when discussing affordable housing needs and strategies. More resources and
		focus should be given to the preservation of existing affordable rental housing and
		the creation of new affordable rental units as there has been an increase in the
		need for affordable rental housing.

8	Agency/Group/Organization	Lancaster County Emergency Management
	Agency/Group/Organization Type	Agency - Emergency Management Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The director of LCEM was consulted virtually. Recommended action of forming a task force which incorporates emergency management as a partner in planning and developing strategies around housing needs and anti-poverty strategy to develop holistic solutions. Poverty and affordable housing should be treated like other emergency or disaster situations. There is also a need for funding for disaster response sheltering in emergency displacement scenarios.
9	Agency/Group/Organization	Lancaster County Office of Aging
	Agency/Group/Organization Type	Services-Elderly Persons Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The director of the Office of Aging was consulted virtually. An increased need for communication and education around programs and services was identified as an area for improved coordination.
10	Agency/Group/Organization	Housing Development Corporation MidAtlantic
	Agency/Group/Organization Type	Housing Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	HDC MidAtlantic was consulted virtually. The need for a more collaborative approach was noted as an area for improved coordination, additionally the challenges present in constructing affordable housing due to the slow timeline of land development approvals and difficulty in building dense housing due to zoning restrictions.
11	Agency/Group/Organization	Tenfold
	Agency/Group/Organization Type	Services - Housing Services-Persons with Disabilities Services-homeless Services-Employment Service-Fair Housing Regional organization Community Development Financial Institution
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Market Analysis Anti-poverty Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Tenfold was consulted virtually. The majority of the discussion was centered around the increased need for fair housing services over the past year over 20 fair housing complaints were filed on behalf of city and county residents and the majority of complaints were related to discrimination based on disability status. Housing affordability is also a major issue with many calls received trying to locate affordable units that are also accessible. After the end of the Emergency Rental Assistance Program a lack of funding for eviction prevention has been a big
		challenge as well and has lead to an increased number of calls. Tenfold staff also discussed the potential for improving coordination through partnering with the county and city on workshops for their monthly housing forums and working to expand municipal outreach around fair and affordable housing at the county level.
12	Agency/Group/Organization	LANCASTER COUNTY HOUSING AUTHORITY
	Agency/Group/Organization Type	PHA Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The County Housing Authority is a department of the Redevelopment Authority and was consulted in person. Areas for improved coordination include potential for owning multi-family properties which serve tenants who receive a housing choice voucher or tenants in need of rental assistance, and increasing communication around unit availability or utilizing project based vouchers for acquisition rehab projects which create or improve affordable rental units.
13	Agency/Group/Organization	Manheim Borough
	Agency/Group/Organization Type	Other government - Local

16

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Manheim Borough was consulted virtually. Improved communication and education around available programs and services for borough residents was identified as an area for improved coordination.
14	Agency/Group/Organization	Lancaster County Food Hub
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Staff of the Food Hub was consulted via a meeting with grantee staff from the Human Services department/CoC. Increased education is needed in the community on the issues of poverty and homelessness, increased resources around the availability of social services to identify gaps and areas of need, and facilitation of partnerships between social service providers by the authority/CoC, and better training and resources around the Empower Lancaster software and CHART system.
15	Agency/Group/Organization	Crossnet Ministries
	Agency/Group/Organization Type	Services-homeless

	What section of the Plan was addressed by	Housing Need Assessment
	Consultation?	Homeless Needs - Chronically homeless
		Homeless Needs - Families with children
		Homelessness Needs - Veterans
		Homelessness Needs - Unaccompanied youth
		Homelessness Strategy
		Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization	Crossnet Ministries was consulted by Human Services dept./CoC staff. More
	was consulted. What are the anticipated outcomes of	education around poverty and mentoring was identified as an area for improved
	the consultation or areas for improved coordination?	coordination.
16	Agency/Group/Organization	Lancaster City Police Bureau - Social Worker
	Agency/Group/Organization Type	Publicly Funded Institution/System of Care
		Other government - Local
	What section of the Plan was addressed by	Homelessness Strategy
	Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization	The Lancaster City Police Bureau's Social Worker was consulted via a meeting with
	was consulted. What are the anticipated outcomes of	CoC staff. There has been an increase in calls related to crisis referrals. Additional
	the consultation or areas for improved coordination?	case management for currently unsheltered and homeless individuals is needed,
		as well as increased communication between CoC staff and police social worker.
17	Agency/Group/Organization	Elizabethtown Community Housing and Outreach Services
	Agency/Group/Organization Type	Housing
		Services - Housing
		Services-homeless

hat section of the Plan was addressed by nsultation?	Housing Need Assessment
nsultation?	
	Homeless Needs - Chronically homeless
	Homeless Needs - Families with children
	Homelessness Needs - Veterans
	Homelessness Needs - Unaccompanied youth
	Homelessness Strategy
	Market Analysis
iefly describe how the Agency/Group/Organization	ECHOS staff was consulted via a meeting with CoC staff. Increased
as consulted. What are the anticipated outcomes of	communication around county housing and homelessness strategy and needs was
e consultation or areas for improved coordination?	identified as an area for improved coordination, as well as facilitating interactions
	between social service and homeless service providers and providing a platform to
	share information and resources about how to best serve clients.
ency/Group/Organization	Lancaster County Planning Department
ency/Group/Organization Type	Other government - County
	Regional organization
	Planning organization
hat section of the Plan was addressed by	Housing Need Assessment
nsultation?	Market Analysis
iefly describe how the Agency/Group/Organization	The county planning commission was consulted virtually. The executive director
	of the agency stated that the development of affordable housing is a challenge in
-	the county due to public perception and misconceptions of affordable housing,
•	and that more education is needed around affordable housing, zoning which
	allows for dense housing types, and the importance of housing choice. These
	topics are areas that our organizations could collaborate on and coordinate
	around to provide education for municipalities, developers, and county residents.
a: e ;e h h r ie a:	s consulted. What are the anticipated outcomes of consultation or areas for improved coordination? ency/Group/Organization ency/Group/Organization Type

19	Agency/Group/Organization	Lancaster County Workforce Development Board				
	Agency/Group/Organization Type	Services-Employment Other government - County Regional organization				
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Economic Development Anti-poverty Strategy				
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Staff of the workforce development board was collaborated virtually. More intentional collaboration between our organizations on issues pertaining to workforce activities and funding as well as needs of the ALICE (asset limited, income constrained, employed) population in the county.				
20	Agency/Group/Organization	Lancaster EMS				
	Agency/Group/Organization Type	Services-homeless Services-Health Publicly Funded Institution/System of Care				
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homelessness Strategy Non-Homeless Special Needs				
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Lancaster EMS (LEMSA) was consulted virtually. Increased coordination for services related to community paramedicine for those who are chronically homeless and in need of medical or mental health interventions or services.				
21	Agency/Group/Organization	Lancaster Clean Water Partners				
	Agency/Group/Organization Type	Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources				

	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Lancaster Clean Water Partners was consulted virtually. Increased coordination and discussion is needed around funding availability, clean water and conservation outreach for homeowners and landowners, prioritization of the clean water countywide action plan in new developments.
22	Agency/Group/Organization	Assets Lancaster
	Agency/Group/Organization Type	Business Leaders
	What section of the Plan was addressed by Consultation?	Market Analysis Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Assets was consulted virtually. Areas identified for increased coordination were engagement and educational opportunities which allow for a discussion of work and needs of small business owners and entrepreneurs in the county.
23	Agency/Group/Organization	Economic Development Company of Lancaster County
	Agency/Group/Organization Type	Services - Narrowing the Digital Divide Planning organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development Anti-poverty Strategy

Briefly describe how the Agency/Group/Organization	EDC of Lancaster is an important partner in municipally focused economic
was consulted. What are the anticipated outcomes o	f development work throughout Lancaster County. In 2022 they released a
the consultation or areas for improved coordination	broadband strategy and have continued to advocate for narrowing the digital
	divide for underserved and unserved, rural areas throughout the county. EDC has
	attempted to engaged with county leadership previously regarding the
	importance of increased broadband access and the need for funding and support
	for implementation. These areas are still high priority needs in order to increase
	access to broadband in the county, as is increased discussion around the
	importance of the issue and prioritization.

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

All relevant agencies types were consulted.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Lancaster County Coalition to End	The goals of the strategic plan are fully aligned with the Continuum
Continuum of Care	Homelessness	of Care plan.

Table 3 - Other local / regional / federal planning efforts

Narrative

AP-12 Participation - 91.401, 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

Lancaster County has a Citizen Participation Plan that prioritizes public involvement in the decision-making processes in the planning, award, and use of, HUD provided federal funding including HOME, CDBG, and ESG. This plan relies on citizen-based review panels to make funding recommendations to the Lancaster County Board of Commissioners. For public improvement projects, the citizen-based process uses a steering committee of municipal officials and interested citizens to rank the projects for funding. For public service dollars devoted to homeless services, the Steering Committee of the Lancaster County Homelessness Coalition makes funding recommendations. The use of citizen panels is described at length in the County's Citizen Participation Plan. Because of the complexity of housing development finance, HOME funds are distributed based on recommendations made by a loan committee made up of a representative from the Economic Development Company, an individual with prior experience as an affordable housing developer, a representative from the County Planning Department, two Redevelopment Authority Board members, a member of City of Lancaster staff and Redevelopment Authority staff.

As part of the Citizen Participation Plan all citizen residents of Lancaster County have the right to submit opinions and proposals regarding programming. The Annual Action Plan process uses a period of 30 days to allow for ample time for public comments, as well as a public meeting at which time staff will give a high level summary of the plan and allow for public feedback and questions. The public hearing is held immediately prior to the Redevelopment Authority's Board Meeting to encourage public attendance and engagement. Each of these mechanisms are advertised publicly in the county's general circulation newspaper. Paper copies of the plan are made available for review at the office of the Redevelopment Authority, County Planning Department, County Commissioners' office, as well as the Lancaster Library Branch. A digital copy of the plan is also published on the Redevelopment Authority. Additionally, during the development of the 5 Year Consolidated Plan a digital survey was used to solicit feedback from the public regarding funding priorities and goals. This survey received over 300 responses and the Consolidated Plan is used to inform each of the Annual Action Plans developed in the five-year time period.

Citizen Participation Outreach

Sort Or	Mode of Out	Target of Out	Summary of	Summary of	Summary of com	URL (If applicable)
der	reach	reach	response/atten	comments rec	ments not	
			dance	eived	accepted	
					and reasons	

1 Public Non- targeted/broa d community Non- targeted/broa d community <t< th=""><th>Sort Or der</th><th>Mode of Out reach</th><th>Target of Out reach</th><th>Summary of response/atten dance</th><th>Summary of comments rec eived</th><th>Summary of com ments not accepted and reasons</th><th>URL (If applicable)</th></t<>	Sort Or der	Mode of Out reach	Target of Out reach	Summary of response/atten dance	Summary of comments rec eived	Summary of com ments not accepted and reasons	URL (If applicable)
OMB Contro No: 2506-0117 (exp. 09/30/2021) nj3+N>. housing instability and homelessness.		Meeting	targeted/broa d community	was held jointly with the City of Lancaster due to the Home Consortium. One member of the public, a city resident, attended the meeting. The meeting occurred on Thursday, April 20th, 2023 at 3:00 pm at the offices of the Redevelopment Authority. The meeting was recorded, the recording is available to view at the url included below, the meeting passcode is	commented asking what resources were available for homeowners to make repairs to their homes, asked about the timeline for construction for a project that had previously received HOME dollars, and asked if any resources from the entitlement funds were used to assist youth and child(cal Action for experier2028 housing instability and	All comments were accepted	25

Sort Or der			Summary of Summary of response/atten dance eived		Summary of com ments not accepted and reasons	URL (If applicable)
2	Internet Outreach	Non-English Speaking - Specify other language: Spanish, Nepali, Swahili Non- targeted/broa d community	No comments received	No comments received	No comments received	https://lchra.com/public-meeting-for-2023- annual-action-plan/
3	-		No comments received	No comments received	No comments received	https://www.lnpclassifieds.com/marketplace /advert/PUBLIC-MEETING-AND-PUBLIC- PARTICIPAT-PUBLIC-MEETING-AND-PUBLIC- PARTICIPAT-Notices_5284

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

Introduction

Lancaster County will have available \$7755341.00 in funding for fiscal year 2023. This funding includes CDBG, HOME, and ESG Entitlement funds, prior year funds, and generated program income. Additionally, to prevent, prepare for, or respond to COVID-19, Lancaster County has an additional \$1,034,021.62 in CDBG-CV1 and CDBG-CV3 available to allocate, and \$5,598,500.55 in HOME-ARP funds available for allocation.

80% of the CDBG-CV funds awarded to Lancaster County, which totaled \$4,609,274.00, must be expended by the end of May 2023. To date \$2,521,253.96 have been expended, which means that an additional \$1,166,165.24 must be drawn prior to the expenditure deadline.

Anticipated Resources

Program	Source	Uses of Funds	Expe	cted Amou	nt Available Ye	ear 1	Expected	Narrative Description
	of		Annual	Program	Prior Year	Total:	Amount	
	Funds		Allocation:	Income:	Resources:	\$	Available	
			\$	\$	\$		Remainder	
							of ConPlan	
							\$	

Program	Source	Uses of Funds	Expe	cted Amou	nt Available Y	ear 1	Expected	Narrative Description
-	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan	
							\$	
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services						CDBG funds will be used for owner- occupied housing activities, renter- occupied housing activities, public facility and infrastructure improvements, borough revitalization, public services, administration and planning. The expected amount available for the remainder of the Con Plan was calculated by using the average change in funding between 2021 and 2023 fiscal years which was a decrease
			2,891,771	576,972	1,190,335	4,659,078	5,591,187	of 2.23%

Program	Source	Uses of Funds	Expe	cted Amou	nt Available Y	ear 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,974,295	223,893	639,665	2,837,853		HOME funds will be used for County and City owner-occupied housing activities, renter-occupied housing activities, administration and planning.The expected amount available for the remainder of the Con Plan was calculated by using the average change in funding between 2021 and 2023 fiscal years which was an increase of 1.92%

Program	Source	Uses of Funds	Expe	cted Amou	nt Available Ye	ear 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional						ESG funds will be used for emergency shelter operations, rapid rehousing activities, financial assistance and administration.The expected amount available for the remainder of the Con Plan was calculated by using the average change in funding between 2021 and 2023 fiscal years which was an increase of 1.65%
		housing	258,410	0	0	258,410	529,698	

Table 5 - Expected Resources – Priority Table

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

The Redevelopment Authority requires that applicants for CDBG funded programs provide matching funds via federal, state, private and/or local funding sources during the various programs Request for Proposal (RFP) and/or Application processes. For public infrastructure improvement projects, a 20% match of other funding is required. Non-profit organizations requesting CDBG funding for public service activities are required to provide matching funds totaling 20% of the project's final cost. There is no obligated amount of matching funds an applicant must provide to

Annual Action Plan 2023 leverage CDBG funds for public service activities; however, applicants with more leveraged funding are more competitive in the funding award process.

In the CDBG funded Home Repair Program we partner with other organizations such as Penn Medicine or United Disability Services to leverage available funding for specific repair areas such as lead remediation, Healthy Homes standards activities, and accessibility improvements. Begininning in April 2023 approximately \$4 million in funding was made available to the Redevelopment Authority for owner-occupied rehabilitation projects for qualifying low- and moderate-income homeowners through the Whole Home Repair Program offered by the Commonwealth of Pennsylvania. This funding will allow the Redevelopment Authority to offer grants of up to \$25,000 through Whole Home Repair program funding for households, and then match up to \$25,000 as a CDBG funded deferred payment loan.

The Homeowner Assistance Program which assists qualifying low- and moderate-income homeowners to make municipally mandated improvements such as sidewalk repairs covers 50% of the cost of the activity up to \$3,500 dollars, the homeowner covers the other 50% of the project costs.

For CDBG funded Rental Rehabilitation program projects CDBG funds are awarded up to \$25,000 per unit maximum, up to 60% of the total project cost. The property owner is responsible for the remaining project cost for the rehabilitation.

All applicants requesting ESG funding for homeless activities must provide a one to one match of other federal, state, local, and private funds. Frequent sources of ESG match are United Way funds, FEMA Emergency Food and Shelter Program funds, private donations, and foundations

Matching funds for HOME program are usually obtained through partnerships with affordable housing developers; however, the County may access the local Affordable Housing Trust fund if additional matching funds are needed. Many of the HOME projects funded in Lancaster County have also received Low Income Housing Tax Credits through the Pennsylvania Housing Finance Agency.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Lancaster County has no publicly owned land or properties that may be used to address needs identified in the plan.

Discussion

31

Not applicable

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year		Area			
1	Create Affordable	2021	2025	Affordable	County of	Affordable Housing -	CDBG: \$0	Rental units constructed: 13
	Rental Units			Housing	Lancaster	Production of New	HOME:	Household Housing Unit
					City of	Units	\$1,750,759	
					Lancaster		ESG: \$0	
					Rivertowns			
2	Create Affordable	2021	2025	Affordable	County of	Affordable Housing -	CDBG: \$0	Homeowner Housing Added: 4
	Owner Units			Housing	Lancaster	Production of New	HOME:	Household Housing Unit
					Rivertowns	Units	\$789 <i>,</i> 665	
							ESG: \$0	
3	Rehabilitate Existing	2021	2025	Affordable	County of	Affordable Housing -	CDBG:	Rental units rehabilitated: 15
	Renter Units			Housing	Lancaster	Rehabilitation of	\$1,384,165	Household Housing Unit
						Units	HOME: \$0	
						Affordable Housing -	ESG: \$0	
						Acquisition of		
						Existing Units		
4	Rehabilitate Existing	2021	2025	Affordable	County of	Affordable Housing -	CDBG:	Other: 0 Other
	Owner Units			Housing	Lancaster	Rehabilitation of	\$300,000	
					Rivertowns	Units	HOME:	
							\$100,000	
							ESG: \$0	

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order 5	Water, Sewer, and	Year 2021	Year 2025	Non-Housing	Area County of	Public	CDBG:	Public Facility or Infrastructure
5	Neighborhood Street	2021	2025	Community	-		\$600,000	Activities other than
	•			,	Lancaster	Improvements and		
	Improvements			Development	Rivertowns	Infrastructure	HOME: \$0	Low/Moderate Income
							ESG: \$0	Housing Benefit: 1500 Persons
								Assisted
6	Public Facilities	2021	2025	Non-Housing	County of	Public	CDBG:	Public Facility or Infrastructure
				Community	Lancaster	Improvements and	\$800,000	Activities other than
				Development	City of	Infrastructure	HOME: \$0	Low/Moderate Income
					Lancaster		ESG: \$0	Housing Benefit: 1000 Persons
					Rivertowns			Assisted
7	Reduce the Number	2021	2025	Affordable	County of	Affordable Housing -	CDBG:	Rental units rehabilitated: 4
	of Blighted			Housing	Lancaster	Rehabilitation of	\$483,142	Household Housing Unit
	Properties				Rivertowns	Units	HOME: \$0	Buildings Demolished: 2
						Affordable Housing -	ESG: \$0	Buildings
						Acquisition of		
						Existing Units		
8	Support Housing	2021	2025	Homeless	County of	Public Services -	CDBG:	Public service activities for
	Services			Non-Homeless	Lancaster	Housing and	\$520,311	Low/Moderate Income
				Special Needs	City of	Homelessness	HOME: \$0	Housing Benefit: 400
					Lancaster		ESG: \$0	Households Assisted
					Rivertowns			
9	Support Rapid Re-	2021	2025	Homeless	County of	Support Homeless	CDBG: \$0	Tenant-based rental assistance
	housing Services				Lancaster	Services	HOME: \$0	/ Rapid Rehousing: 150
					City of		ESG:	Households Assisted
					Lancaster		\$143,415	
					Rivertowns			

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
10	Assist Emergency	2021	2025	Homeless	County of	Support Homeless	CDBG: \$0	Homeless Person Overnight
	Shelter Activities				Lancaster	Services	HOME: \$0	Shelter: 225 Persons Assisted
					City of		ESG: \$95,615	
					Lancaster			
					Rivertowns			
11	Administrative Costs	2021	2025	Administration	County of	Affordable Housing -	CDBG:	Other: 0 Other
					Lancaster	Production of New	\$571,460	
					City of	Units	HOME:	
					Lancaster	Affordable Housing -	\$197,429	
					Rivertowns	Rehabilitation of	ESG: \$19,380	
						Units		
						Affordable Housing -		
						Acquisition of		
						Existing Units		
						Public		
						Improvements and		
						Infrastructure		
						Public Services -		
						Housing and		
						Homelessness		
						Economic		
						Development and		
						Borough		
						Revitalization		
						Support Homeless		
						Services		

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Create Affordable Rental Units								
	Goal Description	Creation of affordable rental units will be supported by HOME funds. HOME funds will be used to support the joint Housing Development Program for the County and City of Lancaster, based on percentages provided by HUD for the HOME Consortium. Projects will apply through a competitve RFP and application process and a committee will be used to select projects which align with identified priorities and meet the Section 215 definition of affordable housing.								
2	Goal Name	Create Affordable Owner Units								
	Goal Description	HOME funds will be used to support the creation of new affordable owner units in Lancaster County which meet the Section 215 definition of affordable housing. Thee units will be subject to the HOME affordable homeownership limits determined by HUD, project development teams will determine the final unit sale prices but the county will ensure compliance with the established limits.								
3	Goal Name	Rehabilitate Existing Renter Units								
	Goal Description	CDBG funds will be used in Lancaster County to rehabilitate, or aquire and rehabilitate, existing renter housing units. Assistance will be made available to landlords or property owners through the county's Rental Housing Rehabilitation Program which provided financial assistance for the rehabilitation of rental properties containing between 2 and 7 units which the property owner agrees to rent at affordable rates for a period of 10 years. The county ensures that compliance with the section 215 definition of affordable housing and HUD established fair market rents.								
4	Goal Name	Rehabilitate Existing Owner Units								
	Goal Description	This funding will be used for administration related to Homeowner Rehabilitation Activities which will be used to assist low- and moderate-income homeowners throughout Lancaster County, excluding the City of Lancaster. These funds will assist in leveraging the ARPA Whole Home Repairs Program funds provided to Lancaster County by the Commonwealth of Pennsylvania's Department of Community and Economic Development. The City of Lancaster will use HOME funds to rehabilitate owner household units.								
5	Goal Name	Water, Sewer, and Neighborhood Street Improvements								
----	---------------------	--								
	Goal Description	CDBG funds will be used to support the public improvements program which provides financial assistance to municipalities for projects which meet established eligibility criteria and benefit low- and moderate-income households, across Lancaster County, not including the City of Lancaster. Projects will be selected via a competitive application process and steering committee.								
6	Goal Name	Public Facilities								
	Goal Description	CDBG funds will be used to support the public improvements program which provides financial assistance to municipalities for projects which meet established eligibility criteria and benefit low- and moderate-income households, across Lancaster County, not including the City of Lancaster. Projects will be selected via a competitive application process and steering committee.								
7	Goal Name	Reduce the Number of Blighted Properties								
	Goal Description	The county will use CDBG funds to acquire and rehabilitate blighted properties which will then be maintained as affordable rental units, meeting both the section 215 definition of affordable housing and HUD fair market rental criteria, for an indefinite period of time.								
8	Goal Name	Support Housing Services								
	Goal Description	CDBG funds will be used to support the public services program of the County of Lancaster. Uses will include assistance for fair housing counseling services which primarily assist non-homeless special needs populations.								
9	Goal Name	Support Rapid Re-housing Services								
	Goal Description	ESG will be used to support rapid rehousing activities which connect homeless individuals and families with permanent housing and supportive services targeted to their specific needs as part of a housing first reponse to homelessness.								
10	Goal Name	Assist Emergency Shelter Activities								
	Goal Description	ESG will be used to support emergency shelter operations and activities throughout Lancaster County to maintain access to shelter programs for unhoused residents of the Lancaster County community.								

11 Goal Name Administrative Costs		Administrative Costs
	Goal	Administrative Costs will be used to support program administration
	Description	

AP-35 Projects - 91.420, 91.220(d)

Introduction

CDBG, HOME, and ESG funds will be directed to do the following projects in Fiscal Year 2023, these amounts include the FY 2023 Allocation as well as program income and prior year resources.

#	Project Name
1	Administration
2	Public Facilities and Infrastructure
3	Owner Occupied Housing Activities - County
4	Owner Occupied Housing Activities - City
5	Renter Occupied Housing Activities - County
6	Renter Occupied Housing Activities - City
7	Acquisition & Rehab
8	Support Housing Services
9	Homeless Services

Table 7 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

These project priorities were set during the 2021-2025 Consolidated Planning Process and were identified through extensive stakeholder outreach with county residents, elected and appointed officials, county government and other municipal employees, and partner organizations who serve low-and moderate-income households, homeless or other non-homeless special needs populations. Due to impacts of the COVID-19 pandemic affordable housing location for low- and moderate-income residents of the county has become more difficult and so much of the county's attention is focused directly on activities which support the creation of new or rehabilitation of existing affordable housing units for both renter and owner households through the CDBG and HOME programs.

AP-38 Project Summary

Project Summary Information

1	Project Name	Administration
	Target Area	County of Lancaster City of Lancaster Rivertowns
	Goals Supported	Administrative Costs
	Needs Addressed	Affordable Housing - Production of New Units Affordable Housing - Rehabilitation of Units Affordable Housing - Acquisition of Existing Units Public Improvements and Infrastructure Public Services - Housing and Homelessness Economic Development and Borough Revitalization Support Homeless Services
	Funding	CDBG: \$571,460 HOME: \$197,429 ESG: \$19,380
	Description	
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	Administration for programs
2	Project Name	Public Facilities and Infrastructure
	Target Area	County of Lancaster Rivertowns
	Goals Supported	Water, Sewer, and Neighborhood Street Improvements Public Facilities
	Needs Addressed	Public Improvements and Infrastructure
	Funding	CDBG: \$1,400,000
	Description	
	Target Date	12/31/2024

	Estimate the number and type of families that will benefit from the proposed activities	These activities will benefit low- and moderate-income families in Lancaster County who reside in qualifying block groups or access services at eligible public facilities. We estimate that in total 2,500 persons will be assisted through these activities.
	Location Description	Activities will occur throughout Lancaster County, either at public facilities which serve eligible populations based on income or presumed- benefit criteria, or through neighborhood improvement projects in qualified block groups
	Planned Activities	Funding will support at least seven total projects thoroughout the county, with a maximimum award of \$200,000 per project. Funds have been budgeted to support at least 3 municipal project and at least 4 public facility projects if each receives the maximum award. Activities will be selected through a competitive application process with selections made by a steering committee and approved by the Redevelopment Authority's Board of Directors. All projects must meet eligibility criteria based on low- and moderate-income population benefit.
3	Project Name	Owner Occupied Housing Activities - County
	Target Area	County of Lancaster Rivertowns
	Goals Supported	Create Affordable Owner Units Rehabilitate Existing Owner Units
	Needs Addressed	Affordable Housing - Production of New Units Affordable Housing - Rehabilitation of Units
	Funding	CDBG: \$300,000 HOME: \$789,665
	Description	CDBG funds will be used for the administration of homeowner-occupied rehab programs, ARPA Whole Home Repair Program funds provided by Pennsylvania to the County of Lancaster will be used to leverage these funds and support the program. Homeowner units must be the primary residence of the applicant and must meet eligibility criteria to qualify for the program.HOME funds will be used to support the creation of four new affordable ownership units, all four units will use established criteria for HOME affordable homeownership units and the section 215 definition of affordable housing. Activities will be selected through a competitive application process and project selection committee.
	Target Date	12/31/2024

	Estimate the number and type of families	Four low- and moderate-income, general population, families will benefit from the HOME activity
	that will benefit from the proposed activities	No families will benefit directly from the use of CDBG funds but the Whole Home Repair Program will serve approximately 50 households.
	Location Description	The CDBG funds will be used to support owner occupied rehab actitives for income eligible homeowners throughout the County, HOME funds will be used to assist the creation of four new affordable ownership units in Columbia Borough, one of the County's rivertowns.
	Planned Activities	CDBG funds will be used for the administration of homeowner-occupied rehab programs, ARPA Whole Home Repair Program funds provided by Pennsylvania to the County of Lancaster will be used to leverage these funds and support the program. Homeowner units must be the primary residence of the applicant and must meet eligibility criteria to qualify for the program.
		HOME funds will be used to support the creation of four new affordable ownership units, all four units will use established criteria for HOME affordable homeownership units and the section 215 definition of affordable housing. Activities will be selected through a competitive application process and project selection committee.
4	Project Name	Owner Occupied Housing Activities - City
	Target Area	City of Lancaster
	Goals Supported	Rehabilitate Existing Owner Units
	Needs Addressed	Affordable Housing - Rehabilitation of Units
	Funding	HOME: \$100,000
	Description	Rehabilitation of four homes for owner occupancy located in Lancaster City
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	An estimated four low- and moderate income families will be assisted through this activity
	Location Description	Units will be located in the City of Lancaster
	Planned Activities	Rehabilitation of four homes for owner occupancy located in Lancaster City
5	Project Name	Renter Occupied Housing Activities - County

Target Area	County of Lancaster Rivertowns
Goals Supported	Create Affordable Rental Units Rehabilitate Existing Renter Units
Needs Addressed	Affordable Housing - Production of New Units Affordable Housing - Rehabilitation of Units Affordable Housing - Acquisition of Existing Units
Funding	CDBG: \$1,384,165 HOME: \$1,437,564
Description	Multi-family rehabilitation of existing units, acquisition and rehab of existing units will utilize CDBG, and creation of new units will utilize HOME funding. CDBG Rental Housing Program activities have a rolling application period and projects are reviewed and selected by staff. HOME funded rental development projects will be selected through a competitive RFP and application process and project selection committee. All activities will meet the section 215 definition of affordable housing.
Target Date	12/31/2024
Estimate the number and type of families that will benefit from the proposed activities	CDBG funds will be used to rehabilitate approximately 15 renter occupied units, and HOME will be used to support the creation of approximately 11 new affordable rental units.
Location Description	Throughout Lancaster County
Planned Activities	Multi-family rehabilitation of existing units, acquisition and rehab of existing units will utilize CDBG, and creation of new units will utilize HOME funding. CDBG Rental Housing Program activities have a rolling application period and projects are reviewed and selected by staff. HOME funded rental development projects will be selected through a competitive RFP and application process and project selection committee. All activities will meet the section 215 definition of affordable housing.
Project Name	Renter Occupied Housing Activities - City
Target Area	City of Lancaster
Goals Supported	Create Affordable Rental Units
Needs Addressed	Affordable Housing - Production of New Units
Funding	HOME: \$313,195

	Description	HOME funds will be used to support the creation of two new affordable rental units in the City of Lancaster. Projects will be selected through a competitive application process and project selection committee.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	Two income qualified families
	Location Description	City of Lancaster
	Planned Activities	HOME funds will be used to support the creation of two new affordable rental units in the City of Lancaster. Projects will be selected through a competitive application process and project selection committee.
7	Project Name	Acquisition & Rehab
	Target Area	County of Lancaster Rivertowns
	Goals Supported	Rehabilitate Existing Renter Units Reduce the Number of Blighted Properties
	Needs Addressed	Affordable Housing - Rehabilitation of Units Affordable Housing - Acquisition of Existing Units
	Funding	CDBG: \$483,142
	Description	Acquisition and rehabilitation activities performed by the Redevelopment Authority will address blighted properties throughout the county, excluding the city, and will focus on the acquisition and rehabilitation of blighted properties as affordable rental units or if necessary the demolition of blighted properties.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	Approximately four families will directly benefit from these proposed activities
	Location Description	Lancaster County
	Planned Activities	Acquisition and rehabilitation activities performed by the Redevelopment Authority will address blighted properties throughout the county, excluding the city, and will focus on the acquisition and rehabilitation of blighted properties as affordable rental units or if necessary the demolition of blighted properties.

8	Project Name	Support Housing Services
	Target Area	County of Lancaster City of Lancaster Rivertowns
	Goals Supported	Support Housing Services
	Needs Addressed	Public Services - Housing and Homelessness
	Funding	CDBG: \$520,311
	Description	Public services and fair housing activities for low- and moderate income residents through partnership with a local organization Tenfold, these services are primarily provided to individuals who are non-homeless special needs populations like the elderly and people with disabilities.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 425 households will be assisted through these activities
	Location Description	Throughout Lancaster County, including Lancaster City
	Planned Activities	Public services and fair housing activities for low- and moderate income residents through partnership with a local organization Tenfold, these services are primarily provided to individuals who are non-homeless special needs populations like the elderly and people with disabilities.
9	Project Name	Homeless Services
	Target Area	County of Lancaster City of Lancaster Rivertowns
	Goals Supported	Support Rapid Re-housing Services Assist Emergency Shelter Activities
	Needs Addressed	Support Homeless Services
	Funding	ESG: \$239,030
	Description	ESG funds will be used to assist emergency shelter activities and support rapid rehousing services throughout Lancaster County to benefit unhoused county residents
	Target Date	12/31/2024

Estimate the number and type of families that will benefit from the proposed activities	Approximately 375 persons will benefit
Location Description	Throughout Lancaster County, including Lancaster City
Planned Activities	Activities to assist emergency shelter activities and support rapid rehousing services will be slected through a competitive application process managed by the Lancaster County CoC/Homelessness Coalition

AP-50 Geographic Distribution - 91.420, 91.220(f)

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

According to the ACS 2011 - 2015 Low- and Moderate-Income Summary data there are 326 total Census Block Groups in Lancaster County. Of these, 112 Block Groups meet the low- and moderate-income exception criteria of 46.74% established for Lancaster County, and would therefore qualify to use Community Development Block Grant (CDBG) funds for public improvement projects. Public Improvements projects will be located throughout the County of Lancaster and will be determined through a competitive Request for Proposals (RFP) process. Public Facilities which serve eligible Lowand Moderate-Income Limited Clientele are also eligible to apply for CDBG funds through Public Improvements program competitive RFP process. Rehabilitation programs that are funded with CDBG dollars are offered to low-and moderate-income homeowners, or to rental properties with income eligible tenants, on a county-wide basis.

HOME funds are provided on a countywide basis to non- and for-profit developers of affordable rental housing. Lancaster County uses a Request for Proposals (RFP) process to allocate HOME funds for new construction and substantial rehabilitation of housing. HOME funds will also be available for homeowner activities and affordable rental housing within the City of Lancaster.

ESG funding will support the goals of the HEARTH Act by working toward ending homelessness through diversion, shelter, and rapid re-housing. Some of these service providers are located in Lancaster City but services are available countywide.

Geographic Distribution

Target Area	Percentage of Funds
County of Lancaster	85
City of Lancaster	10
Rivertowns	5

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Areas with a concentration of low-income households are defined as those areas where more than 51 percent of the households have incomes less than 80 percent of the Median Family Income. Because the County has so few areas where 51 percent or more of the population is of low or moderate income, it determines the fundability of its activities using the "exception criteria", established by HUD. Under this rule, activities located in areas of the County with low-and moderate-income populations, which exceed 46.74% of the total population of the area, would generally meet the minimum requirement of principally benefitting low-and moderate-income persons. There are 112 census block groups

Annual Action Plan

distributed throughout theCounty including Lancaster City, that meet the exception criteria. These qualified block groups are generally located in and around the county's boroughs. One of the largest concentrations of low-and moderate-income block groups are in the Western part of Lancaster County, along the river, in the Borough of Columbia. Because of this, a greater focus will be on the "Rivertowns", and activities will be funded to help with infrastructure and economic development opportunities.

The City of Lancaster and County have determined that joining together as a consortium to obtain funding under the HOME program will increase their ability to provide affordable housing for the very low-, low-and moderate-income residents of the City and County. The targeted percentage of funds to the City represents the HOME funding that will be distributed for programs benefiting city residents.

Discussion

Lancaster County uses a competitive application process to allocate funds for CDBG-funded infrastructure, public services, and ESG funds using citizen panels to review applications and make funding recommendations to the Lancaster County Commissioners. This highly competitive process considers how the applicant seeks to address the priorities and needs of Lancaster County in areas with the highest concentration of low- and moderate-income residents. With limited funding available, the projects are also reviewed as to their readiness to proceed.

Because Lancaster County has no areas of minority concentrations, the funding assistance will be distributed geographically using the Census block groups with income levels less than the defined exception criteria. Alternatively, funding will be provided to low and moderate income households and individuals throughout the County.

AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i) Introduction

The Lancaster County Homelessness Coalition (LCHC) works to make homelessness rare, brief and nonrecurring. Operating under the auspices of the Lancaster County Redevelopment Authority since 2022, the Coalition has broadened its base of partners (currently at 150) to address all issues that may result in individuals and families becoming homeless. LCHC collaborates with direct service providers to form a cohesive homelessness services community, one designed to improve the housing stability of clients along the entire continuum of care. The services provided range from community homeless outreach to emergency, transitional, and crisis housing, to permanent supportive housing projects. It also maintains the Empower Lancaster HMIS, which draws providers together and facilitates collaboration between organizations and levels within the continuum.

Even more so than in FY22-23, homelessness and affordable housing remain major challenges for our community. In the coming fiscal year, it will be the goal of the Lancaster County Homelessness Coalition to effectively steward public resources, elevate the lives of our most vulnerable neighbors, and reverse trends in homelessness and displacement. The Coalition will take on several exciting projects in the coming year, including the opening of a new low-barrier shelter within the city of Lancaster that will serve the county and include built-in permanent supportive housing units. It continues to work to improve service delivery across the county by leveraging the Empower Lancaster HMIS, the expertise of its staff and board, and the best data-driven practices available.

Additionally, of particular note are collaborative efforts with both funded and non-funded partners such as twice yearly Whole CoC meetings, System wide service based meetings (ie: County wide coordinated Assessment meetings) and various affordable housing advocacy meetings.

Finally, the Fair Housing and Landlord Tenant Center housed by Tenfold and provides services for nonhomeless special needs populations (elderly, frail elderly, persons with disabitilities, persons with HIV/AIDS and their familites, and public housing residents) including; Consultations with landlords and tenants, Fair Housing, and General Community Housing Outreach, Responses to Fair Housing Complaints from the community, Fair Housing + Community Training and Workshops, Informal Landlord Tenant Housing Resolutions, Management of the Lancaster County 811 referrals and recertifications, Manage the Community Rental Equity Fund and Manage the HRRC Collaborative. Persons with disabilities, the elderly, and public housing residents are frequent populations served through these services.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

The Lancaster County Homelessness Coalition supports and supervises a team of Outreach Workers, trained professionals who conduct client-facing operations on the street and in shelter. These professionals are trained to conduct CHART assessments and foster warm-handoff connections to shelters and other service agencies. Individual client needs are assessed through coordinated assessments, as well as relational engagement with clients. Outreach workers communicate needs and concerns back to Homelessness Coalition staff, where it feeds into our planning and program design processes.

The Coalition will continue support these efforts in the coming year. Having successfully established a dedicated and knowledgeable community homeless outreach team in partnership with local service providers, we will now seek to improve service delivery and move more clients off of the street and into housing. We will achieve these goals by 1) carefully defining and tracking the services provided by the Outreach team using HMIS. This will give us clearer data on the needs of this client population. 2) We will also use HMIS to track the types and number of referrals made on clients' behalf, including the outcomes of those referrals. This will help to identify bottlenecks in this part of the continuum. 3) We will work with the outreach team to gather better data about clients' exit destinations and housing status. This will allow us to quantify the state of homelessness in the CoC on a more regular basis, and to better understand the barriers that keep clients from gaining and maintaining permanent housing.

Addressing the emergency shelter and transitional housing needs of homeless persons

Recently collected data from the 2023 Point-in-Time and Housing Inventory counts show an increase in unsheltered homelessness in Lancaster County, and a decrease in the availability of beds in emergency shelter and transitional housing projects. It seems clear that the end of COVID-era emergency programs has left a vacuum in the community and is increasing needs beyond service providers' capacities. It will be necessary to reverse these trends in the next year, with the aim of decreasing the number of unsheltered homeless people and increasing the availability of shelter. The county's goal will be to build shelter capacity and move clients through the continuum of care more rapidly while still providing the services that those clients need to succeed and gain permanent housing.

It will be necessary to maintain all existing emergency shelter and transitional housing projects. The Coalition's network of partners provides for those shelters in the city of Lancaster, Columbia, Gap, and Ephrata, with additional cold-weather shelter capacity in Elizabethtown, and Lancaster City. In addition, the Coalition will establish a new shelter and service hub in the city of Lancaster to increase the supply of beds. Beyond emergency shelter, this location will include some permanent supportive housing units

for clients with disabilities. Staff on-site will provide case management as well as coordinated entry services.

Under the Coalition's guidance, shelters in the county will endeavor to decrease the average and median length of stay for emergency shelter clients. Programs will work to connect clients with benefits, including insurance, and their progress will be tracked using the HMIS. Referrals to rapid rehousing services, as well as exit destinations from shelter, will need to be tracked more carefully in order to gauge the success of those programs in moving clients toward permanent housing. The Coalition will make regular use of its HMIS' system performance measures report to show the success of those programs over time.

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

The high price of housing in Lancaster County continues to present a major barrier to entry for homeless individuals and families with low or no income. Low vacancy rates show that the area's rental market is very competitive. Reports from rapid rehousing program staff support these data. Furthermore, the end of COVID-era rental assistance programs has severely lowered the amount of available funds to help keep precariously housed clients in their homes. In other words, the conditions in the county present a major challenge to clients, their families, and service providers. The Coalition must work in the coming year to alleviate some of that downward pressure and find better solutions.

We will continue to work with providers at all levels—outreach, coordinated entry, transitional housing, and rapid rehousing—to move clients away more efficiently from the street and toward permanent, sustainable housing. This will be a collaborative process that makes use of the Empower Lancaster HMIS, one with the goal of reducing the time clients spend on the street, as well as the number of days they spend in shelter before moving on to rapid rehousing, transitional housing, or a housing destination. The HMIS allows for detailed data collection and prioritization, particularly on the part of coordinated entry workers, and this should allow us to dedicated resources to the clients with the most need. As with other goals, it will be necessary for partner organizations to improve the quality of the data they capture about clients in order to make those prioritization decisions accurate, and to demonstrate their success.

Directly increasing the number of available shelter and permanent supportive housing beds in the county should also help as well, directing service to clients on the street and eliminating a major bottleneck the Lancaster system, shelter capacity.

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

The Lancaster County Homelessness Coalition continues to collaborate with the Lancaster County Re-Entry Coalition and Lancaster General Health/ Penn Medicine to address discharge planning and prevent homelessness among individuals leaving other systems of care. However, our own analysis shows that involvement with the criminal justice system and complex health needs are overwhelmingly common among those in our community who have experienced homelessness—and especially among those who are chronically homeless. Prevention and diversion will continue to be a primary goal for Lancaster's coordinated entry team, and coordinating its work with providers outside of the homeless services system will help address part of the problem. Expanding other elements of the local system, such as emergency shelter and rapid rehousing, will benefit this group as well. However, addressing the additional barriers experienced by this group will require a deeper collaboration with community partners, one with the shared goal of a discharge planning pipeline that prevents clients with multiple barriers from becoming homeless in the first place.

Discussion

AP-75 Barriers to affordable housing -91.420, 91.220(j) Introduction

The 2021-2025 Consolidated Plan identifies and supports measures by both the Redevelopment Authority and the Lancaster County Planning Department to meet Lancaster County communities' needs for the development of more units of affordable housing.

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

Because Pennsylvania is a Commonwealth, the ability to change public policies on issues such as land use controls, tax policies, zoning, fees, charges and growth limitations are limited. Each of the 60 municipalities in Lancaster County create respective policies on these issues. The County of Lancaster works to educate and inform local public officials on the benefits of affordable housing and specific actions that can be taken to reduce any barriers to affordable housing.

The Planning Department has established a strategy with measurable goals for land use policy that will focus on smart growth concepts and increase the availability of affordable housing, with the goal of 15% of all new housing to be designated for low- and moderate-income families. The Planning Commission is making strides to educate the public and local planning officials on the benefits of affordable housing by creating a web-based "toolbox" of resources for municipalities to reach their community development and affordable housing goals.

In 2021 the Lancaster County Redevelopment Authority in conjunction with the City of Lancaster updated the Analysis of Impediments to Fair Housing Choice.

Discussion

AP-85 Other Actions - 91.420, 91.220(k) Introduction

Actions planned to address obstacles to meeting underserved needs

The Lancaster County Redevelopment Authority strives to balance the need for affordable housing, infrastructure and human services with the funds that are available. When allocating CDBG, ESG and HOME funds, careful attention is given to targeting low- and moderate-income persons in Lancaster County. By reaching out to low- and moderate-income populations through networking, public meetings, public notices and speaking opportunities, Lancaster County makes sure information about its programs reaches the target customers. The Lancaster County Redevelopment Authority will continue to collaborate and coordinate with other community partners such as the United Way of Lancaster County for their ongoing community assessment efforts which will target areas of underserved needs.

Actions planned to foster and maintain affordable housing

Lancaster County plans to foster and maintain existing affordable housing through its CDBG funded Home Repair and Rental Housing Rehabilitation programs. The County Home Repair program aids lowand moderate-income homeowner households to make major system, safety, and security improvements to their homes. Through the Rental Housing Rehabilitation program, the County assists in the creation of affordable rental units through the rehabilitation of existing rental units for low- and moderate-income households. The City of Lancaster plans on maintaining affordable housing through its Homeowner Rehabilitation Program to provide financial and technical assistance to rehabilitate owneroccupied homes within the City limits.

Actions planned to reduce lead-based paint hazards

Lancaster County complies with the Lead-Based Paint Rule. The County developed a policy related to lead-based paint for each housing program funded with CDBG, HOME or ESG dollars, as well as the Lancaster County Housing Authority's Housing Choice Voucher Program, to ensure compliance with the regulations. The staff members of the Redevelopment Authority of the County of Lancaster's Technical Services Department conduct risk assessments and clearance inspections. Technical staff from the Redevelopment Authority also work with municipalities to develop code around lead safety and inspections for rental housing.

The Redevelopment Authority's Home Repair program partners with the LGH Penn Medicine Lead Free Families program to leverage additional funding to perform lead remediation in homes where children under the age of 6 reside or are frequently present. The Home Repair program provides education around the dangers of lead in the home and lead testing. In a typical year around 15 to 20 homes that

undergo rehabilitation through the Home Repair program meet the requirements for lead testing, and around 5 projects each year involve some form of lead-based paint hazard reduction.

Actions planned to reduce the number of poverty-level families

Services provided through CDBG Public Services activities and ESG funded programs for individuals and families experiencing homelessness will help to reduce the number of poverty level families in Lancaster County.

Actions planned to develop institutional structure

To ensure coordination with Lancaster County's goals, the County requires the Lancaster County Planning Commission to review CDBG infrastructure projects to ensure that projects outlined in the Consolidated Plan are consistent with the objectives and strategies reported in Lancaster County's Comprehensive Plan, Places 2040. Lancaster County, through the Redevelopment Authority of the County of Lancaster, will continue to be involved in interagency efforts to strengthen the institutional structure for housing and economic development, including but not limited to, having a representative serve on:

- Lancaster County Homelessness Coalition's Steering Committee;
- Susquehanna Riverlands Conservation Landscape Leadership Committee;
- Economic Development Company of Lancaster's Loan Review Committee;
- Tenfolds's Coalition for Sustainable Housing;
- Lancaster City Alliance's Team of Lead Organizations for Building on Strength; and
- Lancaster County Eviction Prevention Network.

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

The Lancaster County Redevelopment Authority will continue to work with other funders such as the City of Lancaster, the County of Lancaster, and the United Way of Lancaster to increase coordination efforts between housing and social services along with the Lancaster County Homelessness Coalition which focuses on persons experiencing or at-risk of homelessness

Discussion

Program Specific Requirements AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

Introduction

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities

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

80.00%

0

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

Any organization or developer planning a multi-family new construction or preservation project in which units will comply with the HOME regulations for rent amounts and/or

tenant/homeowner income can apply for HOME funding. Qualifying projects include but are not limited to Multi-family Low Income Housing Tax Credit projects, Multi-family preservation/rehabilitation, single family rental, Multi-family mixed-income with set aside compliant affordable units, new construction single-family homeownership opportunities.

Applicants respond to an RFP issued jointly by the Lancaster County Redevelopment Authority and City of Lancaster. The RFP outlines compliance and priorities for the funding year. Applicants provide project and team information, tenant income and rents for all units, development budget, operating budget proforma, and sources of funding. Staff then completes underwriting to determine eligibility, available loan amounts and number of designated HOME units needed. Staff then makes funding recommendations to a project review committee made up of representatives from both the City and County including former developers, planning department staff, economic development staff, elected officials and architects. The development team is invited to present the proposed project to the committee and clarify any details. The committee provides feedback and/or support for staff. Staff then brings funding recommendations to the Redevelopment Authority Board of Directors for final approval before award notifications are issued.

Beneficiaries of HOME funding through rental projects are typically low- and very low- income tenants, making 50% or below area median income. We assist both senior (55+ or 65+) projects and general occupancy units. There is no specific preference, but we want to see a mix of unit and occupancy types, as well as geographic representation throughout the county

Projects funded with the county's HOME dollars may additionally seek County American Rescue Plan (APRA) funding for capital costs. Funding for operation costs may also include allocation of county ESG funding. For both capital and operation costs, development teams would apply separately in funding rounds to follow.

The county will give preference to projects targeting general occupancy tenants. The County will set aside 15% of the total allocation for CHDO use, \$435,677.95.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

All homebuyers assisted with HOME funds for down payment and closing cost assistance are required to repay the assistance at the time of sale or transfer of property. A lien is placed on the property to secure the loan. Affordable homeownership units which are created using HOME funds will use the resale provisions. The Resale/Recapture Policy for Homeownership Activities for the County of Lancaster can be accessed at https://lchra.com/wp-content/uploads/2023/03/HOME-Resale.Recapture-Policy-2021.pdf. HOME funds used for homebuyer assistance or for the

rehabilitation of Owner-occupied single family houisng will use the HOME affodable homeownership limits for Lancaster County provided by HUD.

Additionally, the the county intents to use the HOME affordable homeownership limits provided by HUD, but development teams can determine the final sale price for homeownership units and the county will ensure the sale price is within the established limits.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The County of Lancaster has an established Resale/Recapture Policy for Homeownership Activities which can be accessed at https://lchra.com/wp-content/uploads/2023/03/HOME-Resale.Recapture-Policy-2021.pdf

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

There are no current plans to use HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds.

- 5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(I)(2)(vii)).
- 6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).
- If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

Emergency Solutions Grant (ESG) Reference 91.220(I)(4)

1. Include written standards for providing ESG assistance (may include as attachment)

Included as an attachment

Additionally the amounts budgeted specifically for street outreach is \$0 and emergency shelter funding is \$95,614

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

All persons experiencing or at risk of homelessness are encouraged to call 211 for a preliminary eligibility screening (prescreen). In coordination with the United Way of Lancaster County, Lancaster's social service community has adopted 211 as its primary point of entry to available community services. Eligible callers are referred to the Community Homeless Assessment and Referral Team (CHART) service providers to attempt system diversion, connect people to shelters, and assess a person or families' vulnerability and service intervention needs. Our community uses a multiple points of access approach for coordinated assessment services. CHART sites are organized in hubs around the county for an assessment as well as a city based larger capacity CHART Hub.

After assessment, CHART staff then refers individuals or families to the most appropriate service available. To increase coordination and access for persons experiencing street homelessness, the CoC's team of Outreach Workers are trained on how to conduct CHART assessments for persons experiencing street or sheltered homelessness and make program referrals.

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

The Lancaster County Redevelopment Authority partners with the City of Lancaster, the Lancaster County United Way and the Lancaster County Homelessness Coalition to create a joint pool of funding for applications for programs providing homeless services. The pool of funding comes from ESG, CDBG, State Homeless Assistance Program, United Way and some CoC dollars.

A request-for-proposals is publicized throughout the community and sent to all previous and potential partners. All programs that would be funded apply to this pool through a standardized application, which are evaluated by organizational and programmatic performance metrics, alignment with the area's strategic initiatives and cost effectiveness.

An Application review committee comprised of CoC Steering committee members and staff from all of the fundings sources review the applications. Funding recommendations are then provided to

the CoC Steering Committee for their approval and then to the Lancaster County Redevelopment Board for final approval. Applicants are notified of funding awards, contract conditions and performance standards, followed by public notification thereof.

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

The jurisdiction continues to be able to meet the homeless participation requirement mentioned above. Through our outreach team and CoC staff, we additionally remain in regular contact with individuals experience sheltered and unsheltered homelessness. These relationships and the information obtained through these client interactions provide context and recommendations to our practices and programs.

5. Describe performance standards for evaluating ESG.

ESG programs are evaluated by the following performance standards. These vary by category of funded program, but the priorities revolve around reducing length of stay, improving client outcomes, and maintaining data quality and fidelity. For example, we ask that:

- 1. 5% or less of all adult & children exits destinations are to "other", "client doesn't know", "client refused"; 0% of exit destinations are "data not collected"
- 2. Reduce Average Length of Stay for Emergency Shelter from previous year.
- 3. Reduce Median Length of Stay for Emergency Shelter from previous year.
- 4. 80% of all RRH exits are to permanent destinations.
- 5. 80% of all adults & children who exit to permanent housing destinations (during the previous reporting period) do not return to homelessness in 6 months.
- 6. 80% of all adults & children who exit to permanent housing destinations (during the previous reporting period) do not return to homelessness in 12 months.
- 7. HMIS Data Quality & Timeliness. 95% of client entry records are entered in 3 days or fewer.
- 8. HMIS Data Quality & Timeliness. All client records have a data quality of 90% or greater.
- 9. HMIS Data Quality & Timeliness. All RRH clients have a data quality of 100% for personally identifiable information (PII).

Discussion

Additional clarifing remarks regarding ESG Administration expenditures for 2020 and 2021 which exceeded the 7.5% limititation. There was a waiver issued in 2020

(https://www.hud.gov/sites/dfiles/CPD/documents/Flexibilities_Waivers_Guidance_for_CARE_Act_CPD _Funds_062320.pdf - beginning on page 11 of guidance document) expanding the allowable ESG administrative percentage from 7.5% to 10%. Staff overseeing compliance and ESG activities believed that this waiver included annual allocation ESG funds in addition to ESG-CV funds made available by the CARES Act, as the ESG funds above the 7.5% limitation were related to activities preventing, preparing for, and responding to community needs throughout the COVID-19 pandemic. Moving forward the authority will comply with the 7.5% limitation in place for ESG administrative funding.

Attachments

Citizen Participation Comments

PUBLIC MEETING MINUTES 2023 ANNUAL ACTION PLAN: City and County of Lancaster Thursday, April 20, 2023, at 3:00 PM at Lancaster County Redevelopment Authority 28 Penn Square, Suite 100, Lancaster, PA 17603

A public meeting to review the City and County of Lancaster's 2022 Annual Action Plan and intent to submit to the Department of Housing and Urban Development (HUD) was held in person and virtually on Thursday, April 20, 2023, at the Lancaster County Redevelopment Authority (LCRA) offices listed above.

In attendance:

County Staff: Michaela Allwine, LCRA; Justin Eby, LCRA;

City Staff: Craig Walt, City of Lancaster; Simone Dia, City of Lancaster; Brynn McGowan, City of Lancaster;

Public Attendees: Gloria Hawkes, City Resident N. Mary Street (virtual attendee)

The public meeting commenced in person and virtually via Zootn at 3:02 PM.

Michaela Alfwine explained the function of the County's public comment period for the Annual Action Plan and gave a general overview of the Fiscal Year 2023 HUD entitlement programs, CDBG, HOME, and ESG. She then presented the County's proposed Community Development Block Grant, HOME, and ESG funding amounts by eligible activity and program goal. She also provided additional details regarding the County/City HOME Consortium structure.

City staff reviewed their entitlement funds for Fiscal Year 2023 and their planning process.

PUBLIC COMMENT

Gloria Hawkes commented on the need for affordable housing in the City and inquired about programming that is available to residents in need of home repairs. She was informed that the County and City both have critical repair programs for eligible homeowners to address these needs and that the County is administering a Whole Home Repair program, made possible through funds provided by DCED, open for eligible City and County residents. She was told to contact program representatives to connect residents with the applicable programs. She also made a general comment that she has noticed an increase in the number of children and youth experiencing homelessness in the shelter system. She asked if there was programming in place to assist in the transition to permanent housing for this population. Justin, Craig, and Simone provided details about the social services agencies that participate in the ESG joint funding efforts that serve children and youth who are experiencing housing instability or are unhoused such as Valley Youth House, YWCA, CAP, and PRC.

The necting was concluded by 3:30 PM.

sugar filling

Jocelynn Ritchey, Manager of Planning and Resource Development

AGENDA FOR JOINT PUBLIC MEETING FOR LANCASTER COUNTY & LANCASTER CITY 2023 ANNUAL ACTION PLANS

Thursday, April 20, 2023 at 3:00 p.m. at the Redevelopment Authority Office 28 Penn Square, Suite 100, Lancaster, PA 17603.

1. Introduction

The purpose of the meeting is to obtain views from interested residents relating to Lancaster County's housing and community development needs and provide an opportunity to comment on the Draft Fiscal Year 2023 activities.

- 2. Lancaster County Entitlement Programs (U.S. Dept. of Housing and Urban Development)
 - a. Public Comment Process
 - b. HUD Entitiement Overview
 - Overview of Lancaster County's Fiscal Year 2023 Annual Action Plan (Citizen Summary)
 - Community Development Block Grant Allocation and Goals
 - HOME Investment Partnerships Program Allocation and Goals
 - Emergency Solutions Grant Allocation and Goals
 - d. Public Comment
- 3. Lancaster City Entitlement Programs (U.S. Dept. of Housing and Urban Development)
 - a. Staff introductions
 - b. Plan Links
 - c. Public Comment Process
 - d. Entitlement Programs and Funding
 - e. Community Development Block Grant Overview and Planned Activities
 - f. Public Comment

Priority Needs and Objectives

- Safe, Decent, Affordable Housing
 - o New Construction of Units (Renter Occupied Units)
 - a Rehabilitation of Units (Renter and Homeowner Occupied Units)
 - o Acquisition of Blighted Units
- Rapid Rehousing Services and Emergency Shelter Facilities for persons who are experiencing

homelessness

- Public Services for Housing and Homeless Services
- Public Sanitary Sewer System and Water System Improvements
- Neighborhood Street Improvements

HUD Formula Grant Funded Programs

Home Repair Program (HRP) uses CDBG dollars to provide financial and technical assistance to rehabilitate owner-occupied homes. Repairs include, but are not limited to, the repair of heating and cooling systems, sewer and septic systems, and leaking roofs.

Vacant Property Reinvestment Program (VPRB) uses CDBG dollars to investigate and certify vacant, blighted residential properties to help eliminate blight in Lancaster County's municipalities.

Rental Housing Rehabilitation Program (RHRP) uses CDBG funding to aid with the rehabilitation of existing rental properties or conversion to rental housing. Properties must have 7 or fewer units and must maintain affordable rents for at least 10 years or the term of the financial assistance.

Homeowner Assistance Program (HAP) uses CDBG dollars to provide financial and technical assistance to make municipally mandated improvements to owner-occupied homes. Improvements include curb and sidewalk repair and replacement, updated sewer and water connections, and other public utility connections.

Public Improvements Program uses CDBG dollars to provide financial assistance to municipalities and public facilities projects which meet eligibility requirements established to ensure the benefit of low-and moderate-income households across Lancaster County. Eligible projects can include water and sanitary sewer systems, storm sewers, curb and sidewalk improvements, street repairs and accessibility improvements, as well as improvements for qualifying public facilities.

Honsing Development Program uses HOME funding to aid with the rehabilitation of existing rental properties, as well as for construction of new rental housing units. These developments will meet the Section 215 definition of affordable housing.

Public Services Program Lancaster County receives an annual entitlement of Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development (HUD). Up to 15% of these funds can be used for "public services" which are intended to support the County's housing and community development efforts.

Homelessness Services Program CDBO and ESG funds available for competitive allocations to support homeless services and housing related services will be combined with three other funding sources to form a larger pool of funds. Organizations serving persons that are homeless as defined by the U.S. Department of Housing and Urban Development (HUD) can apply to this consolidated pool of funding which is expected to make approximately \$1.5 million available for distribution.

Funding Sources:

- Lancaster County CDBG and ESG Entitlement funds
- United Way funds
- Lancaster County's Hometess Assistance Program funds from the state
- City of Lancaster's Emergency Solutions Grant

Eligible services include but are not limited to:

- Rapid Rehousing Programs
- Emergency Shelter Operations
- Homeless Outreach Services
- Coordinated Entry Services

2023 Annual Action Plan

Citizen Summary

April 2023



What is an Annual Action Plan

The Annual Action Plan serves as the formal application to HUD for entitlement grant funds received by Lancaster County. The plan provides specific answers to questions pesed by HUD and outlines how the funds received will be allocated throughout Lancaster County.

HUD Formula Grants

Community Development Block Grant (CDBG)

CDBG funds will be used for a variety of housing, community development, and public service activities that will benefit low- and moderate-income persons throughout Lancaster County.

HOME Investment Partnerships Program (HOME)

HOME funds will be allocated for new construction and rehabilitation of affordable owner and rental housing units. HOME funds are received for both the County and City of Lancaster as part of a Consortium Agreement for the County to administer the City's entitlement.

HOME funds are split between the city and county utilizing a percentage provided by HUD. From the 2023 allocation t,ancaster County will receive approximately 76.75% or \$1,515,190, and Lancaster City will receive approximately 23.25% or \$459,105 of the total award amount.

Emergency Solutions Grant (ESG)

ESG funds will support rapid re-housing services and shelter operations in Lancaster County.

Fiscal Year 2023 Funding Summary

CDBG	l
Annual Allocation	\$ 2,891,771.00
Program Income	\$ 576,972.00
Reprogrammed	\$ 1,190,334.97
Total	\$ 4,659,077.97
номе	E:
Annual Allocation	\$ 1,974,295.00
Program Income	\$ 223,893.00
Reprogrammed	\$ 639,665.45
Total	\$ 2,837,853.45
ESG	
Annual Allocation	\$ 258,410.00
Total Available Funding	\$7,755,340.97

2021-2025 Strategic Goals

- Create affordable owner and renter housing
- Rehabilitate affordable owner and renter housing
- Reduce the number of blighted properties
- Support neighborhood infrastructure and public facility improvements
- Support housing services, including Fair Housing
- Support rapid re-housing services
- Assist emergency shelter activities

View and Comment on the Plan

- Visit our website: https://lchra.com/resources/document-center/plans-reports/
- Send us an email: Jocelynn Ritchey, Manager Planning and Resource Development, jritchey@lchra.com
- Attend a public meeting: Thursday, April 20, 2023, at 3:00 P.M. via Zoom or at the offices of the Lancaster County Redevelopment Authority ~ 28 Penn Square, Suite 100, Lancaster PA 17603

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Create Affordable Benter Units	County HOME:	\$1,437,564.00
create Anordable Kenter Onits	City HOME:	\$313,194.50
Create Affordable Owner Units	County HOME:	\$789,665.45
Rehabilitate Existing Renter Units	CDBG:	\$1,384,164.73
Debelaite Frieder Outerstation	CDBG:	\$300,000.00
Rehabilitate Existing Owner units	City HOME:	\$100,000.00
Neighborhood Infrastructure Improvements	CDBG:	\$600,000.00
Public Facility Improvements	CDBG:	\$800,000.00
Reduce the Number of Blighted Properties	CDBG:	\$483,142.24
Support Housing Services	CDBG:	\$520,311.38
Support Rapid Rehousing Services	ESG:	\$143,415.00
Assist Emergency Shelter Activities	ESG:	\$95,614.25
	CDBG:	\$571,459.62
Administrative Costs	HOME:	\$197,429.50
	ESG:	\$19,380.75

Redevelopment Authority Staff

Justin Eby - Executive Director

Michaela Allwine - Director of Housing and Community Development

Deb Jones - Director of Human Services

Jocelynn Ritchey – Manager of Planning and Resource Development

Rachel Valmonte - Compliance Manager

Jody Heinrich - Human Services Grants Manager

Outcome Measurement

All activities must address one HUD objective:

- Provide a suitable living environment
- Provide decent housing
- Provide economic opportunity

All activities must also address one HUD outcome:

Redevelopment Authority Board of Directors

- Improve availability/accessibility
- Improve affordability
- Improve sustainability

Ed Fisher - President

Melinda Kaufman

Jim Eby

Jim Williams - Vice President

Gerald Robinson - Treasurer

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> Annual Action Plan 2023
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County of Lancaster}

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Affiant's Signature

Notary Public

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PUBLIC MEETING AND PUBLIC PARTICIPATION NOTICE LANCASTER COUNTY FISCALYEAR 2023 ANNUAL ACTION PLAN The public comment or

The public comment pe-riod for the 2023 Annual Acried for the 2023 Annuel Ac-tion Plans begins with this notice, dated March 21, 2023, and finishes at end of day April 24, 2023. A virtual public meeting will be held on Thursday, April 20th at 3:00 p.m. via zoom, to pro-vide the public with an op-outunity to review and portunity to review and comment on the proposed 2023 FiscalYear Annual Ac-tion Plan for the County of Lancaster, A link will be made available on www.lchra.com a week prior to the meeting date. Written comments should be addressed to Jocelynn

Written comments should be addressed to Jocelynn Ritchey, Lancester County Redevelopment Authority, 28 Penn Square, Suite 200, Lancester PA 17603, or sub-mitted via amail to jritchey@lchra.com. The Annual Action Plan presents the objectives and activities to be accom-plished in Fiscal Year 2023 using new funding, pro-gram income, and prior year resources provided to (ancester County by the U.S. Department of Housing and Urban Development through the Community De-velopment Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solution Grant (ESG) programs. The 2023 Annual Action Plan which includes more specific details on expected resources, annual goals and objectives and ableineted

resources, annual goals and objectives, and anticipated projects is available for revisw at the office of the Re-development Authority of Lancaster County, located at 28 Penn Square, Suite 200, Lancaster PA 17603 or at www.lohre.com. Addiat www.lchra.com. Addi-tional copies of the plan are also available to view at the Lancaster County Planning Department, Lancaster County Board of Commis-sioners, and the Lancaster County Library. The draft plan is glao available digi-tally at https://lchra.com/ resources/document-ce ntar/plans-reports/. If you wish to attend the

zoom meeting, if you need language assistance or other accommodation to participate in the meeting

or review the plan, please contact Jocalynn Ritchey, Manager - Planning and Resource Development et 717-869-5722 or et 717-869-5 jritchey@lchra.

Jritchey@ichre. orm. AVISO DE REUNIÓN PÚBLICAY PARTICIPACIÓN PÚBLICA CONDADO DE LANCASTER ANO FISCAL 2023 PLAN DE ACCIÓN ANNUAL El período de comentar-ios públicos para los Pienes de Acción Anuales 2023 comienze con este eviso, con fecha del 21 de marzo de 2023 y finaliza al finad del día 24 de abril de 2023. Se día 24 de abril de 2023. Se llevará a cabo una reunión pública virtual el jueves 20 de abril a fas 3:00 p.m. a de april a las 300 p.m. a través de zoom, pera brindar al público la opor-tunidad de revisar y comen-tar el Plah de Acción Anuel del Año Fiscal 2023 prop-uesto para el Condado de Lancaster. Un enlace estará disponible el www.lchra.co m una semena antes de la fecha de la reunión. Los comentarios por escrito deben dirigirse a Jocelynn Ritchey, Autoridad de Reus-banización del Condado de Lancaster, 28 Penn Square, Sulte 200, Lancaster PA 17603, o enviarse por correo electrónico a iritchey@lchra.co

El Plan de Acción Anual presenta los objetivos y acuvidades que se lograrán en el año fiscal 2023 utilizando nuevos fondos, ingresos del programa y re-cursos del año anterior proporcionados el Condado proporcionados el Condeido de Lancaster por el Depar-tarmento de Vivlenda y De-sarrolto Urbano de los Es-tados Unidos el través de los programes Community Development Block Grant (CDBG), HOME Investment Pertnerships (HOME) y Emergency Solution Grant (ESG) (ESG

El Plan de Acción Anual El Plan de Acción Anual 2023 que incluye detalles más específicos sobre los recursos esperados, las metas y objetivos anuales y los proyectos anticipados está disponible para su re-telán o la oficiar de la Au visión en la oficina de la Au-toridad de Raurbanización del Condado de Lancaster, ubicada en 28 Penn Square, Suite 200, Lancaster PA 17603 o en vww.Johca.com.

Copias adicionales del plan también están disponibles para vor en el Departa-mento de Planificación del Condado de Lancaster, la Junta de Comisionados del Condado de Lancaster y la Biblioteca del Condado de Lancaster. El borrador del plan también esté disponible digitalmente en https://ichra.com/resource/d ocument-center/plans-repo rts/.

Si desea asistir a la reunión de zoom, si necesita asistencia lingüística u otra adaptación para participar en la reunión o revisar el plah, comuniquese con Jo-celynn Ritchey, Gerente de Planificación y Desarrollo de Recursos al 717-869-5722 o jritchey@lchra.com.

Page 2

Lancaster County Pennsylvania - 2022 Consolidated Annual Performance Evaluation Report (CAPER)

Summary of Public Comments: NONE RECEIVED

A public commont period was held between March 10-26, 2023 and was publicly advertised on March 9, 2023

A public meeting regarding FY 2022 Performance was held on June 7, 2023, with a public notice advertising the hearing published on May 22, 2023.

During this time no public comments were received.

Hunger Manager of Planning and Resource Development

PUBLIC MEETING MINUTES 2022 CAPER Performance Meeting: County of Lancaster Wednesday, June 7, 2023, at 3:00 PM at Lancaster County Redevelopment Authority 28 Penn Square, Suite 100, Lancaster, PA 17603

A public meeting to review the County of Lancaster's 2022 CAPER and Performance and intent to submit the report to the Department of Housing and Urban Development (HUD) was held in person and virtually on Wednesday, June 7, 2023, at the Lancaster County Redevelopment Authority (LCRA) offices listed above.

In attendance:

County Staff: Jocelynn Ritchey, LCRA; Michaela Allwine, LCRA; Justin Eby, LCRA;

Public Attendees: None

The public meeting was called to order at 3:00 PM.

Jocelynn Ritchey reviewed funding allocations, accomplishments, and performance for the 2022 Fiscal Year Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) programs.

There was no public attendance to the meeting or public comment provided.

The meeting was concluded at 3:30 PM.

riunn/Ritchey, Manager of Planning and Resources Development

AGENDA FOR PUBLIC MEETING FOR LANCASTER COUNTY 2022 PERFORMANCE

Wednesday, June 7, 2023 at 3:00 p.m. at the Redevelopment Authority Office 28 Penn Square, Suite 100, Lancaster, PA 17603.

1. Introduction

The purpose of the meeting is to review outcomes and accomplishments for interested residents relating to Lancaster County's housing and community development needs and provide an opportunity to comment on the Fiscal Year 2022 activities.

- 2. Lancaster County Entitlement Programs (U.S. Dept. of Housing and Urban Development)
 - a. Public Comment Process
 - b. HUD Entitlement Overview
 - c. Overview of Lancaster County's Fiscal Year 2022 Outcomes
 - Community Development Block Grant Allocation and Goals
 - HOME Investment Partnerships Program Allocation and Goals
 - Emergency Solutions Grant Allocation and Goals
 - d. Public Comment
 - e. Meeting Adjournment

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Affiant's Signature

Notary Public

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Notification of a Public Hearing Related to Lancester County's Fiscal Year 2022 Consolidated Annual Performance and

Consolidated Annuel Performence and Evaluation Report (CAPER) to the U.S. Department of Housing and Urban Development The Lancaster County Re-development Authority, on behalf of the County of Lan-caster, will hold a public hearing on Fiscal Year 2022 Performance objectives and achievements related to funding provided to the county by the US Depart-ment of Housing and Urban Development. The public hearing will be held at the offices of the Lancaster County Redevelopment Au-hority located at 28 Penn Square, Lancaster PA 17803, Suite 100 on Wednesday, June 7th, 2023, at 3:00 pm. Participation is welcome in person or virtually, please reach out to Jocefynn person or virtually, please reach out to Jocelynn Ritchey to confirm your st-

Ritchey to confirm your st-tendance. The Report details the per-formance of Lancaster county's community Devel-opment Block Grant Pro-gram (CDSG), Community Development Block Grant CARES Act Program (CDBG-CV) HOME Investment Part-nerships Program (HOME), Emergency Solutions Grant CARES Act Program (HOME), Emergency Solutions Grant CARES Act Program (ESG-CV) for the period January 1, 2022 through December 31, 2022, It provides an as-sessment of program progress according to spe-cific objectives and activi-ties and an analysis of the programs' benefits to low-and moderate-income resi-dents of Lancaster County. A copy of the report is tendance.

dents of Lancaster County. A copy of the report is available for public review by request. Contact Joce-lynn Ritchey, Manager – Planning and Resource De-velopment at (717) 394-0793 Ext. 210, or at princhey@ichra.com to re-quest that a copy be melled to you. A copy of the report is available for public re-view on the Redevelopment Authority's website at https://lchra.com/resour cesvidoos.mont-center/pla ces/document-center/pla ns-reports/.

Comments made in writ-ing during this period will

be forwarded to HLD along with the CAPER. All written comments should be di-rected to Jocelynn Ritchey, Manager – Planning and Re-source Development, Rede-velopment Authority of the County of Lancaster; 28 Penn Square, Suite 200, Lancaster, PA 17603-4297, (717) S94-0793 Ext. 210, or at iritchey@lchra.com. at jritchey@lchra.com.

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Affiant's Signature

Notary Public

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Notification of Intent to Submit

Lancaster County's Flacel Year 2022 ansolidated Annual

Consolidated Annual Performance and Evaluation Report to the U.S. Department of Housing and Urban Development The Lancaster County Re-development Authority. on behalf of the County of Lan-caster, will submit the Fiscal Year 2022 Consolidated An-nual Performance and Eval-uation Report (CAPER) to the U.S. Department of Housing and Urban Devel-opment (HUD) on March 31, 2023, The Authority is now providing a public com-mont period for the Report. A formal comment period will be open from March 10,

A formal comment period will be open from March 10, 2023 to March 26, 2023. The Report details the per-formance of Lancaster Coundy's Community Devel-opment Block Grant Pro-gram (CDBG), Community Development Block Grant CARES Act Program (CDBG-CV) HOME investment Part-nerships Program (HOME), Emergency Solutions Grant Program (ESG), and the Emergency Solutions Grant Emergency Solutions Grant CARES Act Program (ESG-CV) for the period January 1, 2022 through December 31, 2022. It provides an as-sessment of program progress according to epe-cific objectives and activities and an analysis of the programs' benefits to low-and moderate-income residents of Lancaster County.

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comments made in writ-ing during this period will be forwarded to HUD along with the CAPER, All written comments should be directed to Jocelynn Ritchey, Manager – Planning and Re-source Development, Rede-volopment Authority of the County of Lancaster; 28 Penn Square, Suite 200, Lancaster, PA 17603-4297, (717) 394-0793 Ext. 210, or at jritchey @ichra.com. Parlodo de Comentarios Públicos para el Informe Anual Consolidado de Desempeño y Evaluación del Departamento de Vivienda y Desarrollo Urbano (HUD) para el Año Fiscal 2023 del Condodo de Lonarcter

Condado de Lancaster Un período de comentar-ios formal estará abierto desde el 10 de marzo del

desde el 10 de marzo del 2023 hasta el 25 de marzo del 2023 para el informe An-ual Consolidado de HUD. El informe detalla el desem-peño del Programa de Community Development Block Grant (CDBG) y del Programa de Community Davelopment Block Grant CARES Act (CDBG-CV), Pro-grama de HDME Invest-mont Parinerships (HOME), Programa de Ernergency Solutions Grant Program (ESG) y el Programa de Emergency Solutions Grant CARES Act (ESG-CV) del T de chero del 2021. El público puede revisar al informe en la oficina del Radevelopment Authority, 28 Penn Square, segundo piso, Lancester, También se puede encontrar en el sitio 2023 hasta al 26 de marzo

piso, tancaster, también se puede encontrar en el sitio web https://teure.com/res ouroos/doou ment-cente //pinn-reporta/. Todos los comentarios es-

Todos los comentarios es-critos deben ser enviados a Jocelynn Ritchey, Manager – Planning and Resource Development, Redevelop-ment Authority of the County of Lancaster; 28 Pann Square, Suite 200, Lancaster, PA 17603-4297, (717) 394-0793 Ext, 210; o por correc electrónico a intchey@lchra.com.

Grantee Unique Appendices



www.lcceh.org

ORIGINAL DOCUMENT APPROVED BY THE LCCEH LEADERSHIP BOARD 7-2-2015 REVISED 7-2016 & 8-2017

Annual Action Plan 2023

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.
9/11/2019	N/A	No changes made, policy reviewed and approved as mandated by HUD yearly review policy

PA 510 CoC STANDARDS AND POLICIES

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- E. Equal Access Rule
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- G. Grievance and Appeals
- H. Grievance and Appeals for Clients
- I. HMIS Policies and Procedures
- J. VOH Forms and Instructions
- K. Mainstream Benefits- USICH
- L. Prioritization Policies
- M. Homeless Definition/Recordkeeping Requirements and Criteria

Annual Action Plan

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.
- 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 ESGfunded 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.
- Clients may use the LCCEH client grievance policy to appeal terminations after the provider's process has been completed. (See Appendix H)

Annual Action Plan

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 <u>Notice Establishing Additional Requirements for a Continuum of Care</u> Issued: January 23, 2017 (See Appendix B for details)

Pre-screening

- 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.
- 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

- 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-HUDdefined 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.
- 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).

 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.
- 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.
- Households waiting for PSH should be served in Rapid Re-Housing programs while waiting for an available PSH unit.
- All new PSH projects considered for funding must be tenant based or scattered site. Current project based PSH providers should consider changing current placecentered 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

- 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.
- 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.