



JUN 18 2018

U.S. Department of Housing and Urban Development

Philadelphia Office  
The Wanamaker Building  
100 Penn Square East  
Philadelphia, Pennsylvania 19107-3380

The Honorable Danene Sorace  
Mayor of Lancaster City  
Municipal Building  
120 North Duke Street  
Lancaster, PA 17602

Dear Mayor Sorace:

RE: Annual Community Assessment  
City of Lancaster  
January 1, 2017 to December 31, 2017

The provisions of the Housing and Community Development Act of 1974, as amended, and the National Affordable Housing Act of 1990, require the annual submission of performance reports by grant recipients receiving federal assistance through programs covered under these Acts. Additionally, these Acts require that a determination be made by the Secretary of the U.S. Department of Housing and Urban Development that the grant recipient is in compliance with the statutes and has the continuing capacity to implement and administer the programs for which assistance is received.

The Consolidated Plan regulations at 24 CFR 91.525 require the Department to evaluate and report to the public on a community's overall progress in the management of its program funds, compliance with the Consolidated Plan, the accuracy of performance reports, and the extent to which progress has been achieved toward the statutory goals identified in Section 91.1. This letter serves to apprise you of our assessment of the City of Lancaster's overall progress.

In making our evaluation, we relied primarily upon the city's submission of the Consolidated Annual Performance and Evaluation Report (CAPER) for Fiscal Year 2017. This report summarized accomplishments made with funds provided from the Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG) programs. This letter is a summary of our review of the city's overall performance.

Under the update to the Part 91 Consolidated Planning regulations, effective March 13, 2006, all Annual Action Plans and CAPERs are required to include performance measures as part of their annual reporting. The Office of Management and Budget has deemed this information necessary to validate the continued funding of HUD programs. The city provided performance measures as required by this guidance.

The HUD timeliness requirement is that a community may have no more than 1.5 times its most recent annual grant remaining in the line of credit 60 days prior to the end of its program year. When the 60-day timeliness test was conducted on November 2, 2017, it was calculated

that the city had a balance in its line of credit of 1.09 times its annual grant, which is in compliance with the 1.5 timeliness standard. Please note that in 2017 HUD began measuring grantee compliance with the CDBG timeliness standard using the adjusted for program income ratio.

During the 2017 program year, the city reports that it expended 94.85 percent of its CDBG funds for activities benefiting low- and moderate-income persons, which meets the primary objective of the Housing and Community Development Act of 1974. In addition, the city spent 9.31 percent of its funds on public service activities, which is below the 15 percent regulatory cap. The city also obligated 5.99 percent of its funds to planning and administration, which is below the 20 percent regulatory cap.

The city received a CDBG grant of \$1,545,784 for Program Year 2017, and expended \$1,122,994 of CDBG funds during the year. Resources were devoted to activities in geographic areas consisting primarily of low- and moderate-income residents throughout the city. The types of activities undertaken with these funds include homeownership assistance, housing rehabilitation, economic development, and activities to create suitable living environments.

In Program Year 2017, \$429,542 of CDBG funds were used for the housing code enforcement program to improve the health and safety conditions in all homes and prevent deterioration of housing stock. Additionally, a total of \$184,300 was used to assist 45 homeowners under the Homeowner Rehabilitation and/or Critical Repair Loan programs. The city also used \$550,000 to improve selected segments of streets in targeted areas of low- and very-low income neighborhoods. The city used \$120,000 for its Neighborhood Crime Reduction program that permitted extra patrols to reduce crime and improve the quality-of-life for residents in low-income neighborhoods.

Additionally, in Program Year 2017 the city received \$141,883 of ESG funds, with \$72,200 used for emergency shelters and \$59,083 used for rapid rehousing. As a result, 117 individuals were provided emergency shelter, while 177 persons experiencing homelessness were provided rapid rehousing assistance.

HUD acknowledges the city's many accomplishments under the CDBG and ESG programs during the 2017 program year. Based on our review we have concluded that the city has the capacity to carry out its programs and has met its reporting requirements.

The city included in its CAPER its efforts to affirmatively furthering fair housing and identify impediments to fair housing, and HUD's Office of Fair Housing and Equal Opportunity (FHEO) evaluated this portion of the the city's Program Year 2017 CAPER. The city, in partnership with Lancaster County, last updated its Analysis of Impediments to Fair Housing Choice (AI) in 2013, at which point it identified eleven impediments to fair housing choice within the jurisdiction. The city's CAPER reported actions taken to address five of the eleven identified impediments. The city provided financial support to the Lancaster Housing

Opportunity Partnership to carry out its Fair Housing Program, including providing fair housing training to the public, distribution of fair housing materials in seven different languages, working with local disability organizations to explore the creation of accessible housing, conducting a disability rights event, and working with local immigrant organizations to share information regarding fair housing rights. The city also installed 170 ADA curb cuts during the program year, and took steps to ensure access for the Limited English Proficiency (LEP) community to programs and services, including document translation and working with the local immigrant organizations and with the Spanish American Civic Association. FHEO has concluded that the city is adequately serving the minority and Hispanic communities and that housing activities were appropriately dispersed throughout the city. We commend the city for the efforts it has made in this regard.

FHEO has the following recommendations for how the city might enhance its efforts to affirmatively further fair housing:

- Since the city identified that LEP is a barrier to fair housing choice, FHEO recommends that the city conduct a four-factor analysis and develop a written Language Access Plan to document its language assistance services for LEP persons to access services.
- While the city is only in the second year of its Five-Year Consolidated Plan period, FHEO recommends that the city take meaningful actions to address all impediments to fair housing choice within the Five Year Consolidated Plan period. Some suggestions include: partnering with the Pennsylvania Human Rights Commission on a training for municipal officials; engaging the Red Rose transit Authority on transit routes; working with local lenders and housing counseling agencies to create a strategy to increase housing and homeownership opportunities in minority communities; and partnering with the housing authority to educate housing providers about the benefits of the voucher program and assist tenants locate housing in areas of opportunity. In addition, FHEO reminds the city that HUD recommends the AI should be updated, or a new analysis completed, every three to five years.

Please note that FHEO is available to provide technical assistance regarding affirmatively furthering fair housing and any of the recommendations provided above upon your request. Should you have any questions, we encourage you to reach out to Melody Taylor, FHEO Regional Director, at (215) 861-7643, or by email at [Melody.C.Taylor@hud.gov](mailto:Melody.C.Taylor@hud.gov).

We ask that you review our assessment of your performance and provide any comments that you may have within 35 days of the date of this letter. Upon receipt, we will evaluate your comments and make any revisions that are deemed appropriate. If you do not have any comments, we request that you formally notify us of that fact within the 35-day timeframe. Where no comments are received within the designated timeframe, our initial letter will serve as our final assessment of the city's performance for this program year. To facilitate and expedite citizen access to our performance letter, we request that you inform the general public and interested citizens' organizations and non-profit entities of its availability. If, for any reason, the

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city chooses not to do so, please be advised that our office is obligated to make the letter available to the public. We appreciate your cooperation in this matter.

We look forward to continuing to work with you and members of your staff to accomplish Departmental goals and mutual objectives to develop viable urban communities. We would also be pleased to provide you with any information on resources that may be available to your community. If you need assistance, or if you have any questions concerning the content of this letter, please contact Mr. Nadab O. Bynum, Community Planning and Development Director, at (215) 861-7652, or Fatina Ming, Senior Community Development Representative, at (215) 861-7662, or by email, at [fatina.ming@hud.gov](mailto:fatina.ming@hud.gov). Our telephone text (TTY) number for the hearing impaired is (800) 877-8339.

Sincerely,



Joseph J. DeFelice  
Regional Administrator

cc:  
Randy Patterson, Director ✓  
Department of Economic Development  
And Neighborhood Revitalization