



U.S. Department of Housing and Urban Development

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FEB 18 2009

EXECUTIVE OFFICE  
LEHIGH COUNTY

The Honorable Donald T. Cunningham, Jr.  
Chairman  
Lehigh County Board of Commissioners  
Government Center  
17 S. 7<sup>th</sup> Street  
Allentown, PA 18101

Dear Mr. Cunningham:

SUBJECT: Annual Community Assessment  
Lehigh County  
October 1, 2007 through September 30, 2008

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 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 this 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 Lehigh County's overall progress.

In making our evaluation, we relied primarily upon Lehigh County's submission of the Consolidated Annual Performance and Evaluation Report (CAPER) for Fiscal Year 2007. This report summarized accomplishments made with funds provided from the Community Development Block Grant (CDBG). This letter is a summary of our review of Lehigh County's performance.

As you know, under the update to the Part 91 Consolidated Planning regulations that came into effect March 13, 2006, all Annual Action Plans and Consolidated Annual Performance and Evaluation Reports (CAPER) are required to include Performance Measures as part of their annual reporting. The Office of Management and Budget (OMB) has deemed this information necessary to validate the continued funding of HUD programs. Lehigh County did not provide Performance Measures in the narrative as required by the new guidance, missing outcome measures for the following goals: development of affordable housing, homebuyer assistance, public facilities and infrastructure, economic development, and public services.