



## Executive Summary

### AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

#### 1. Introduction

As a Federal Entitlement, Lehigh County is required to complete an annual application for the use of the Community Development Block Grant (CDBG) funds to the U.S. Department of Housing and Urban Development (HUD). The Annual Action Plan is a guide to how the County will allocate its resources for specific activities that support the Goals and Objectives of Lehigh County's Five Year Consolidated Plan. This is Lehigh County's Third Annual Action Plan as a part of the Five Year Consolidated Plan, which was approved by HUD-Philadelphia. The Five Year Consolidated Plan describes the housing and non-housing needs of County residents and presents a five-year strategy to address those needs. The FY 2021 Annual Action Plan for Lehigh County includes the County's CDBG Program and outlines which activities the County will undertake during the program year beginning October 1, 2021 and ending September 30, 2022. Lehigh County's Department of Community and Economic Development is the lead entity and administrator for the CDBG funds.

The FY 2021 Annual Action Plan outlines the actions to be undertaken in Fiscal Year 2021 with the Federal resources allocated to Lehigh County. The FY 2021 Annual Action Plan excludes the Cities of Allentown and Bethlehem (despite being located within Lehigh County) since they are both Federal Entitlements that receive their own CDBG allocations from HUD. The CDBG Program and activities outlined in this FY 2021 Annual Action Plan will principally benefit low- and moderate-income persons and will provide funding to targeted areas of the County where there is the highest percentage of low- and moderate-income residents. The Annual Action Plan does not incorporate the Public Housing Authority's Comprehensive Grant (Comp Grant) into this plan, but the public housing authority participated in the planning process for the development of this plan.

The Five Year Consolidated Plan relied upon efforts of many individuals, organizations, and citizens, in the development of a comprehensive strategy to address the needs of the County. The goal of Lehigh

County is to improve the quality of life for County residents by funding improvements to public facilities, infrastructure, public services, and by retaining and increasing the stock of affordable owner and rental housing units.

Available Funds:

Entitlement Funds: FY 2021 CDBG \$1,284,677.00; CDBG Program Income \$0.

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.

The goal of Lehigh County is to improve the quality of life for County residents by funding improvements to public facilities and infrastructure, providing public services, and by retaining and increasing the supply of affordable housing units for both owner occupants and renters. During the FY 2021 CDBG Program Year, the County proposes to address the following priority need categories identified in its Five Year Consolidated Plan:

3. Evaluation of past performance

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

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Summary from citizen participation section of plan.

The Annual Action Plan is made up of multiple components, which include: funding applications from municipalities, social service agencies, and housing organizations; citizen participation comments; and the development of the Annual Action Plan.

Each item of the plan primarily benefits the low- and moderate-income population in Lehigh County. Lehigh County has an approved Citizen Participation Plan, as required by HUD, which is on file with HUD and at the Lehigh County Department of Community and Economic Development. The County abided by its Citizen Participation Plan in the preparation and development of the FY 2021 Annual Action Plan.

The first step of the planning process for the FY 2021 Annual Action Plan started with the distribution of applications for CDBG funds. On Monday, February 15, 2021 the Department of Community and Economic Development distributed the FY 2021 CDBG Requests for Funding to local municipalities and non-profit agencies/organizations. These were due back to the County by 4:00 PM on Monday, May 03, 2021. Information was also available on the Lehigh County Department of Community and Economic Development's website.

The County held two (2) public hearings to obtain resident input on the needs of Lehigh County. The needs public hearing notice was published on Friday, February 26, 2021 in "The Morning Call," and the needs public hearing notice was posted on the County's website and emails were sent to local municipalities and non-profit agencies/organizations. The first needs hearing was held on Tuesday, March 23, 2020 at 11:00 AM and the second needs hearing was held on Wednesday, March 24, 2021 at 5:00 PM; both hearings were held by way of a conference call. At these public hearings, residents had the opportunity to give their input and their thoughts on the housing, community development, and economic development needs in Lehigh County and how the CDBG funds should best be spent to benefit low- and moderate-income persons.

The Final Public Hearing Notice was published on Thursday, June 24, 2021. At the Public Hearing, held on Wednesday, July 28, 2021 at 2:00 PM, the residents were given the opportunity to comment on the "draft" version of the FY 2021 Annual Action Plan and which projects/activities would be funded.

The FY 2021 Annual Action Plan was on public display beginning July 1, 2021 through July 31, 2021 at the following locations in the County and on the County's website (<http://www.lehighcounty.org/>):

Lehigh County Department of Community and Economic Development - Lehigh County Government Center, 17 South 7th Street, Allentown, PA 18101

Catasauqua Public Library - 302 Bridge Street, Catasauqua, PA 18032

Coplay Library - 49 South 5th Street, Coplay, PA 18037

Emmaus Public Library - 11 East Main Street, Emmaus, PA 18049

Lower Macungie Library - 3400 Brookside Road, Macungie, PA 18062

Parkland Community Library - 4422 Walbert Avenue, Allentown, PA 18104

Slatington Library - 650 Main Street, Slatington, PA 18080

Southern Lehigh Public Library - 3200 Preston Lane, Center Valley, PA 18034

Whitehall Township Public Library - 3700 Mechanicsville Road, Whitehall, PA 18052

## 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.

Lehigh County recorded public comments at the three (3) public hearings on the needs of the County. There were four (4) attendees and two (2) Lehigh County Department of Community and Economic Development (DCED) staff members present at the first session of the first public hearing on Tuesday, March 23, 2021 at 11 a.m. A meeting summary can be found in the Appendices. There were zero (0) participants and one (1) Lehigh County DCED staff member at the second session of the first public hearing held on Wednesday, March 24, 2021. A meeting summary can be found in the Appendices. All comments were accepted.

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

There were five (5) funding applications that were not approved for FY 2021 funds. Of the projects not funded, two (2) were public facility improvements: Score – Operating Support and Lehigh Conference of Churches – Daybreak Drop-In Center were not funded as they were not located in a low- to moderate-income area. Two (2) applications: Slatington Borough – East South Street and Han-Le-Co Fire Department – Fire Protection Equipment were not funded as the project location was not primarily residential. The final application not funding was the Macungie Borough – Memorial Park Association Handicap Accessible Lift.

## 7. Summary

The FY 2021 Annual Action Plan for Lehigh County includes the County's CDBG Program and outlines which activities the County will undertake during the program year beginning October 1, 2021 and ending September 30, 2022. This is the County's third year of its Five Year Consolidated Plan.

During the FY 2021 Program Year, Lehigh County, Pennsylvania anticipates the following Federal financial resources:

- |                       |                 |
|-----------------------|-----------------|
| • FY 2020 CDBG Funds  | \$ 1,284,677.00 |
| • CDBG Program Income | \$ <u>0.00</u>  |

Total: \$ 1,284,677.00

Annual Action Plan  
2021

During the FY 2021 CDBG Program Year, Lehigh County proposes to address the following priority need categories from its Five Year Consolidated Plan:

- Housing Strategy Goal - retain the existing housing stock, development of affordable housing, and homebuyer assistance.
- Homeless Strategy Goal - homelessness prevention, services, shelter and transitional housing, permanent housing, and non-homeless special needs.
- Community Development Strategy Goal - public facilities and infrastructure, economic development, and public services.
- Administration and Planning

A “draft” of the FY 2021 Annual Action Plan was placed on display at the Lehigh County Government Center and on the County’s website, which is the location of the Department of Community and Economic Development offices at 17 South Seventh Street, Allentown, PA, as well as eight (8) regional libraries for public review. The display period started on Thursday, July 1, 2021 through Saturday, July 31, 2021 for a 30-day display period. In addition, the County put the draft Plan on its website (<http://www.lehighcounty.org/>). A Final Public Hearing was held on Wednesday, July 28, 2021 to discuss the proposed activities and solicit citizen comments. All comments were accepted. Upon completion of the 30-day comment period, Lehigh County submitted the FY 2021 Annual Action Plan to the U.S. Department of Housing and Urban Development Philadelphia Office on Friday, August 4, 2021.

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

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

Describe the agency/entity 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	LEHIGH COUNTY	
CDBG Administrator		Community and Economic Development
HOPWA Administrator		
HOME Administrator		
HOPWA-C Administrator		

Table 1 – Responsible Agencies

### Narrative (optional)

The Lehigh County Department of Community and Economic Development is the administering agency for the CDBG program. The Community and Economic Development Department has four (4) full-time staff members, and one (1) part-time staff members, and a planning consulting firm to help assist with the oversight and compliance of the CDBG and housing programs. The Department of Community and Economic Development prepares the Five Year Consolidated Plan, Annual Action Plans, ERRs, and the Consolidated Annual Performance and Evaluation Reports (CAPER), draws down funds for invoices, performs contract administration, and oversees the program on a day-to-day basis. Sub-recipients are monitored on an annual basis for compliance, or more often as needed, and are provided with technical assistance as needed.

### Consolidated Plan Public Contact Information

Contact Person: Mr. Frank Kane, Director for the Lehigh County Department of Community and Economic Development

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Website: <http://www.lehighcounty.org/>

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

### 1. Introduction

While preparing the FY 2021 Annual Action Plan, Lehigh County consulted with the Lehigh County Housing Authority, local municipalities, non-profit agencies/organizations, and members of the Eastern Pennsylvania CoC - Lehigh Valley Regional Homeless Advisory Board, which includes the following two (2) counties: Lehigh and Northampton.

The Eastern Pennsylvania CoC serves and acts as the oversight and planning body for preventing and ending homelessness for the CoC general membership body. Lehigh County is a member of the Lehigh Valley Regional Homeless Advisory Board (LV-RHAB) under the Eastern PA CoC. The Board comprises a diverse set of representative stakeholders throughout Lehigh and Northampton Counties. The Board sets policy based on the knowledge and experience of its members. The Board also sets priorities and makes funding decisions.

Other members of the Board consist of the social service agencies, shelter providers, etc., that serve residents in the region. Coordination of the programs and funds is accomplished by the CoC Board for chronically homeless individuals and families, families with children, veterans, and unaccompanied youth, along with the administration of the HMIS System.

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(l))

Lehigh County works with the following agencies to enhance coordination:

- Lehigh County Department of Community and Economic Development - oversees the CDBG program.
- Lehigh County Housing Authority - oversees the Section 8 Housing Choice Voucher Program, improvements to public housing communities, and the development of scattered site affordable housing.
- Social Services Agencies - the County provides funds to address the needs of low- and moderate-income persons.
- Housing Providers - the County provides funds to rehabilitate and develop affordable housing for low- and moderate-income families and individuals
- Lehigh Valley Regional Homeless Advisory Board - oversees the Continuum of Care Network for Eastern Pennsylvania CoC - Lehigh Valley Regional Homeless Advisory Board for the following counties: Lehigh and Northampton.



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.

Lehigh County is a member of the Lehigh Valley Regional Homeless Advisory Board (LV-RHAB) under the Continuum of Care Network for Eastern Pennsylvania (Eastern PA CoC). The Eastern PA CoC is administered by the Pennsylvania Department of Community and Economic Development (PA-DCED). Lehigh County's Department of Community and Economic Development staff attends the local CoC meetings and acts as the County's representative. The County coordinates its activities with the Continuum of Care and supports its applications for funds. The County helps the Eastern Pennsylvania CoC to address homelessness by working together to develop a framework to deliver housing and services to the homeless.

The RHAB identifies regional and local homeless issues; coordinates regional planning; identifies regional housing gaps and needs, strategies, and priorities; provides input for Supportive Services for Veteran Families (SSVF) and Emergency Solutions Grants (ESG) applications; participates in completion of the CoC application; monitors Homeless Management Information Systems (HMIS) participation and implementation; and coordinates and follows-up on the Point in Time (PIT) count and Annual Homeless Assessment Report (AHAR). Lehigh County is a member of the Lehigh Valley Regional Homeless Advisory Board (RHAB), which also includes Northampton County. Many of the homeless resources in Lehigh and Northampton Counties are utilized by residents of both Counties. The Lehigh Valley RHAB CO-Chairs are currently representatives of Catholic Charities in Allentown, PA, which is located in Lehigh County and the Third Street Alliance in Easton, PA, which is located in Northampton County.

The CoC solicits and considers a wide range of opinions through the five (5) Regional Homeless Advisory Boards' (RHABs) monthly meetings and semi-annual full CoC meetings. Both forums provide opportunities for persons to provide input and assistance in ending homelessness. The RHAB Chairs represent multiple interest groups including: CDBG Jurisdictions, Public Housing Authorities, domestic violence service providers, Veterans, youth service providers, Community Action Partnerships (CAP), homeless service providers, and faith-based organizations.

Most of the Eastern PA CoC comes under the State Consolidated Plan developed by PADCED, however, there are twelve (12) additional Consolidated Plan Jurisdictions representing the more populated areas of the Lehigh Valley and Cumberland County, plus cities. PADCED uses web-based forums to meet with Regional Housing Advisory Committees (RHACs). RHAC meetings are held annually and generally last two (2) hours. The RHACs include state grantees, housing officials, developers, non-profits, CoC Chairs, and PADCED staff. Also, as part of the citizen participation process, members of the CoC receive notice of public meetings, documents available for review, and citizen comment periods. The County and City

Consolidated Plan Jurisdictions follow the Con Plan guidelines for consultation, including interviews, surveys, and focus groups with stakeholders knowledgeable about homelessness in their communities.

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

Most of the Eastern PA CoC ESG funding is allocated by PADCED. The CoC participated in developing priorities, target populations, outcome measures, and evaluation processes for ESG under HEARTH, including prioritizing Rapid Re-Housing (RRH) for 45% of funds (excluding emergency shelters, outreach, and administration). Since then, the CoC has provided input on ESG funding decisions and project scoring based on knowledge of projects, capacity of applicants and participation in CoC planning. PADCED, as the Collaborative Applicant and HMIS Lead, has access to Point in Time and Homeless Management Information System (HMIS) data. PADCED convened a Data Committee composed of CoC members to review and analyze quarterly CoC performance reports for establishing benchmarks and data driven performance standards for outcome evaluation and funding decisions.

The CoC finalized a Monitoring Plan in June 2017 which sets performance standards and outlines a process for evaluating the outcomes of projects receiving both CoC and ESG funding. This process will be carried out by the CoC's Data Committee, the five RHABs, and the Governing Board.

The CoC and the HMIS Lead work together to assess data quality throughout the CoC. This includes working on Annual Homeless Assessment Report (AHAR) submission, the PIT count, project review/ranking, and working with individual programs while completing their Annual Performance Reports (APRs). The CoC continues to work towards increasing the bed coverage percentage in HMIS. According to the Eastern PA CoC, the largest overall barrier to HMIS-participation remains non-HUD funded volunteer and faith-based operated projects and VA-funded projects, such as VASH. Additional outreach to volunteer and faith-based organizations will occur through the implementation of coordinated entry. Increased engagement and education among these groups should lead to increased HMIS participation. The CoC will work with Veterans to improve participation among VA-funded projects.

In addition, the CoC works closely with the HMIS Lead Agency on the HMIS policies and procedures. Specifically, many system modifications have been made in order to create the infrastructure for implementation of Coordinated Entry.

The HMIS Lead Agency maintains the CoC's Governance Charter for HMIS, the HMIS Privacy and Security Plan, the HMIS Data Quality and Functionality Plan, and the MOU with the CoC. These documents are reviewed and approved by the CoC's Governing Board.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

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Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	LEHIGH COUNTY
	Agency/Group/Organization Type	Housing Services - Housing Service-Fair Housing Other government - County Regional organization Planning organization Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Community Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Lehigh County Department of Community & Economic Development submitted a funding request for the County-wide Housing Rehabilitation Program. The County continues to provide this program throughout the county each year. The program was funded in FY 2020.
2	Agency/Group/Organization	Lehigh County Housing Authority
	Agency/Group/Organization Type	Housing PHA Services-Persons with Disabilities Other government - County Regional organization
	What section of the Plan was addressed by Consultation?	Public Housing Needs 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?	Lehigh County Housing Authority was contacted and presented the housing needs of very low-income persons.

3	Agency/Group/Organization	North Penn Legal Services
	Agency/Group/Organization Type	Housing Services-Education Service-Fair Housing Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment 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?	North Penn Legal Services was contacted and submitted a request for continued funding for fair housing activities and legal aide to LMI residents. The County reviewed the application and funded the activity because it met the goals and objectives as outlined in the County's Five Year Consolidated Plan.
4	Agency/Group/Organization	Lehigh Valley Regional Homeless Advisory Board (LV-RHAB)
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless Services-Health Service-Fair Housing Regional organization Planning organization Correction Institutions
	What section of the Plan was addressed by Consultation?	Housing Need Assessment 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?	Lehigh Valley Regional Housing Advisory Board was contacted to determine the needs of the homeless in Lehigh County. The County is a member of the Board and is part of the ongoing discussions on how to assist the homeless. The Third Street Alliance was contacted and submitted a request for funding of a LV RHAB Coordinator to provide a match source to their Northampton County grant to provide administrative funding to the LVRHAB to support efforts of the CoC.
5	Agency/Group/Organization	Lehigh Valley Planning Commission
	Agency/Group/Organization Type	Other government - County Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Lehigh Valley Planning Commission was contacted to determine the planning needs in Lehigh County. The County did not receive any comments on the Annual Action Plan.
6	Agency/Group/Organization	Lehigh Career & Technical Institute
	Agency/Group/Organization Type	Services-Education Regional organization Schools
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs 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?	Lehigh Career & Technical Institute was contacted about the needs of low income residents. Lehigh Career & Technical Institute (LCTI) continues to provide scholarships to low- to moderate-income individuals for high demand fields using previous years' CDBG funding. The County did not fund this project in FY 2020.
7	Agency/Group/Organization	COMMUNITIES IN SCHOOLS OF THE LEHIGH VALLEY
	Agency/Group/Organization Type	Services-Children Services-Education Other government - County Regional organization Schools
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs 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?	Communities in Schools was contacted and submitted a request for funding, in collaboration with LCTI, to continue its program for case management and assistance for low-income students enrolled in the Lehigh Career and Technical Institute. The County funded the activity in FY 2020.

8	Agency/Group/Organization	Lehigh Valley Center for Independent Living
	Agency/Group/Organization Type	Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment 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?	LVCIL was contacted and submitted a request for continued funding for housing location assistance. The County reviewed the application and funded the activity because it met the goals and objectives as outlined in the County's Five Year Consolidated Plan.
9	Agency/Group/Organization	The Literacy Center
	Agency/Group/Organization Type	Services-Education Regional organization
	What section of the Plan was addressed by Consultation?	Economic Development



Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Literacy Center was contacted and submitted a request for continued funding for ESL, GED and ABE instruction. The County reviewed the application and funded the activity because it met the goals and objectives as outlined in the County's Five Year Consolidated Plan.
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Identify any Agency Types not consulted and provide rationale for not consulting

All known types were consulted and contacted during the planning process.

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	Lehigh Valley Regional Homeless Advisory Board	They are incorporated into the Five Year Consolidated Plan and the Annual Action Plans.
Annual and Five Year Capital Plans	Lehigh County Housing Authority	They are incorporated into the Five Year Consolidated Plan and the Annual Action Plans.
2018 Childhood Lead Surveillance Annual Report	PA Department of Health	The data is incorporated into the Annual Action Plan.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

Lehigh County consulted and coordinated with various agencies and organizations on both a county-wide and state-wide basis. The culmination of these efforts has resulted in the development of the County's FY 2021 Annual Action Plan.

The Lehigh County Department of Community and Economic Development (DCED) is the administrating agency for the CDBG program. Close coordination is maintained with other County departments, as well as regional organizations such as the Community Action Committee of the Lehigh Valley, Discover Lehigh Valley, Greater Lehigh Valley Chamber of Commerce, Lehigh County Industrial Development Authority, Lehigh Valley Economic Development Corporation, Lehigh Valley Industrial Park, Inc., Lehigh Valley Planning Commission, and the Eastern PA Continuum of Care. Lehigh County Department of Community and Economic Development coordinated with each municipality in Lehigh County as well as various non-profit organizations, such as New Bethany Ministries, Lehigh Valley Community Land Trust, Valley Youth House, Community First Fund, Catholic Charities, Communities in Schools of the Lehigh Valley, Lehigh Career & Technical Institute, Lehigh Valley Center for Independent Living, Meals on Wheels of the Greater Lehigh Valley, North Penn Legal Services, and The Literacy Center. These agencies and others helped aid the planning process. Lehigh County DCED works closely with the Lehigh County Commissioners and County staff to address projects and activities that extend beyond the County limits. The County and the regional agencies have a good working relationship.

## AP-12 Participation – 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

The Annual Action Plan is made up of multiple components, which include: funding applications from municipalities, social service agencies, and housing organizations; citizen participation comments; and the development of the Annual Action Plan. Each item of the plan primarily benefits the low- and moderate-income population in Lehigh County. Lehigh County has an approved Citizen Participation Plan, as required by HUD, which is on file with HUD and at the Lehigh County Department of Community and Economic Development. The County abided by its Citizen Participation Plan in the preparation and development of the FY 2021 Annual Action Plan.

The FY 2021 Annual Action Plan planning process started with the distribution of applications for CDBG funds. On Monday, February 15, 2021 the Department of Community and Economic Development distributed the FY 2021 CDBG Requests for Funding to local municipalities and non-profit agencies/organizations. These were due back to the County on Monday, May 3, 2021. Information was also available on the Lehigh County Department of Community and Economic Development's website.

The County held two (2) public hearings to obtain resident input on the needs of Lehigh County. The needs public hearing notice was published on Friday, February 26, 2021 and was posted on the County's website and emails were sent to local municipalities and non-profit agencies/organizations. At these public hearings, residents had the opportunity to give their input and their thoughts on the housing, community development, and economic development needs in Lehigh County and how the CDBG funds should best be spent to benefit low- and moderate-income persons. The Final Public Hearing Notice was published on Thursday, June 24, 2021, and held on Wednesday, July 28, 2021 at 2:00 PM, the residents were given the opportunity to comment on the "draft" version of the FY 2021 Annual Action Plan and which projects/activities would be funded with FY 2021 CDBG funds.

The FY 2021 Annual Action Plan was on public display July 1, 2021 through July 31, 2021 at the the Lehigh County Department of Community and Economic Development, Lehigh County Government Center, 17 South 7th Street, Allentown, PA 18101, at all of the area libraries located in the County, and on the County's website (<http://www.lehighcounty.org/>).

## Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Agencies/Organizations</p>	<p>The needs public hearing notice for both hearing sessions was published on February 26, 2021 in The Morning Call. The second public hearing notice was published on June 24, 2021 in The Morning Call. The notifications were also posted on the County's website and emails were sent to local municipalities and non-profit agencies/organizations.</p>	<p>The Citizen Participation attachment includes both advertisements.</p>	None	Not applicable

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Hearing #1	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Agencies/Organizations</p>	<p>The first needs hearing was held on Tuesday, March 23, 2021 and the second needs hearing was held on Wednesday, March 24, 2021.</p>	<p>See public hearing summaries in the Citizen Participation attachment to this Plan.</p>	<p>None.</p>	<p><a href="http://www.lehighcounty.org/">http://www.lehighcounty.org/</a></p>
3	Internet Outreach	<p>Non-targeted/broad community</p>	<p>None.</p>	<p>None.</p>	<p>None.</p>	<p><a href="http://www.lehighcounty.org/">http://www.lehighcounty.org/</a></p>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Electronic (email) Blast	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Agencies/Organizations</p>		<p>Of the nineteen (19) funding applications received in FY 2020, sixteen (16) were funded. One (1) application was not eligible. Lehigh County needs were addressed by the funded projects.</p>	None.	Not applicable

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Public Hearing #2	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Agencies/Organizations</p>	<p>The second public hearing to solicit comments on the FY 2021 CDBG budget and the draft FY 2021 Annual Action Plan was held on Wednesday, July 28, 2021.</p>	<p>See public hearing summaries in the Citizen Participation attachment to this Plan.</p>	<p>None.</p>	<p><a href="http://www.lehighcounty.org/">http://www.lehighcounty.org/</a></p>

Table 4 – Citizen Participation Outreach

## Expected Resources

### AP-15 Expected Resources – 91.220(c)(1,2)

#### Introduction

Lehigh County is receiving \$1,284,677 in CDBG funds. The program year is from October 1st through September 30th of each year. These funds



will be used to address the following priority needs:

- Housing
- Homeless
- Community Development
- Economic Development
- Administration, Planning, and Management

The accomplishments of these projects/activities will be reported in the annual Consolidated Annual Performance and Evaluation Report

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,284,067	0	0	1,284,067	2,568,134	

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

In addition to the entitlement funds, Lehigh County anticipates the following federal resources may be available to local non-profit organizations to undertake the housing strategies identified in the Five Year Consolidated Plan:

- Supportive Housing Program
- Low-Income Housing Tax Credit Program (LIHTC)
- Section 8 Rental Assistance Program
- Shelter Plus Care
- Section 8 Moderate Rehabilitation Program for Single Room Occupancy (SRO)
- Public Housing Development

Lehigh County is eligible to receive funds during this program year from the following Federal, State, County, and Private Organizations:

- Lehigh County Affordable Housing Trust Funds (AHTF) - The Pennsylvania Optional County Affordable Housing Trust Funds Act of 1992 (Act 137), allows counties to raise revenues for affordable housing efforts by increasing the fees charged by the Recorder of Deeds Office for recording deeds and mortgages. The County raised the fee from \$13 to \$26 per document. Affordable Housing Trust Funds revenue is used to fund affordable housing initiatives and up to 15 percent may be used for the administrative costs to implement the initiatives. Eligible activities include using the revenues as the local matching funds to secure Federal and State Funds, construction or rehabilitation financing, housing related services, match for other State or Federal funds, and supporting first-time homebuyer second mortgage programs. Lehigh County will not allocate funds in FY 2020 from the Affordable Housing Trust Fund to allow the funds to grow and be used for future projects. The current balance of the AHTF is \$455,722.00.
- Continuum of Care Grant - Lehigh County is part of the Lehigh Valley Regional Housing Advisory Board. This is a two (2) county region that applies for Continuum of Care funds each year. In FY 2017, the Lehigh Valley received funding for Twenty-six (26) projects totaling \$14,491,899.00 for support services and permanent supportive housing projects throughout the region.
- The Lehigh County Housing Authority - Expects to receive \$545,914.00 in FY 2021 funds from the Public Housing Capital Fund Program, as well as Public Housing Operating funds and Section 8 Housing Choice Voucher assistance.
- Emergency Solutions Grant (ESG) Funds – In FY 2020, the Lehigh Valley received \$207,500 and will use these funds during 2020 and 2021. The funds will be used for Rapid Rehousing in the amount of \$30,000, Rapid Rehousing in the amount of \$140,000, Street Outreach in the amount of \$30,000, and \$7,500 for administration of the programs during 2021 and 2022.
- Emergency Solutions Grant (ESG) Funds CV 2 – In FY 2020 the Lehigh Valley received \$359,504 and will use these funds during 2020 and

2021. The funds will be used for Rapid Rehousing in the amount of \$158,000, Homeless Prevention in the amount of \$66,155, Emergency Shelter in the amount of \$48,000, Temporary Emergency Shelter in the amount of \$15,000, Street Outreach in the amount of \$52,000, and \$20,349 for administration of the programs during 2021 and 2022

- Emergency Solutions Grant (ESG) Code Blue Funds - In FY 2020, the Lehigh Valley received \$51,696 to provide winter emergency shelter while addressing local needs resulting from the coronavirus pandemic impacting Pennsylvania. Contracts had an end date of April 1, 2021.
- PA DCED for 2021 HOME Funding - This funding will continue the Accessibility and Rehabilitation Improvements for the Elderly (ARIE) program. This program assists elderly and disabled households, providing comprehensive housing rehabilitation and disability modification services, enabling households to remain in a safe and healthy home while also improving mobility in and around the property.

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

Not applicable. The County has not acquired or improved any land, property, or buildings that are available for sale by using CDBG funds.

## Discussion

Lehigh County is a member of the Eastern Pennsylvania Continuum of Care Network, PA-509 Continuum of Care, administered by the Lehigh Valley Regional Homeless Advisory Board (RHAB). The Lehigh Valley RHAB covers two (2) counties in the region. These counties include Lehigh and Northampton. Agencies in both counties have received CoC funds including The Salvation Army, Catholic Charities of Diocese of Allentown, Inc., Lehigh Conference of Churches, Lehigh County Housing Authority, Resources for Human Development, Inc., Valley Housing Development Corporation, Third Street Alliance for Women and Children, Valley Youth House Committee, Inc., and the Northampton County Housing Authority.

In Lehigh County, there is a network of provider agencies that address the shelter and transitional housing needs of persons who are homeless. The shelter and transitional housing in Lehigh County include, but is not limited to the following examples:

Community Action Committee of the Lehigh Valley - Sixth Street Shelter (Emergency Shelter)

Community Action Committee of the Lehigh Valley - Turner Street Apartments (Transitional Housing)

Salvation Army Emergency Shelter (Emergency Shelter)

Salvation Army Transitional Shelter (Transitional Housing)

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	HSS-3 Housing Rehabilitation	2019	2023	Affordable Housing	County Wide	Housing Priority	CDBG: \$305,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 65 Households Assisted Homeowner Housing Rehabilitated: 3 Household Housing Unit
6	HSS-6 Fair Housing	2019	2023	Affordable Housing	County Wide	Housing Priority	CDBG: \$10,000	Public service activities for Low/Moderate Income Housing Benefit: 40 Households Assisted Other: 1 Other
8	HOM-1 Housing	2019	2023	Homeless	County Wide	Homeless Priority	CDBG: \$29,700	Public service activities for Low/Moderate Income Housing Benefit: 30 Households Assisted
14	CDS-1 Community Facilities	2019	2023	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$47,231	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 3586 Persons Assisted Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
15	CDS-2 Infrastructure	2019	2023	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$95,069	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1810 Persons Assisted Other: 2 Other
16	CDS-3 Public Services	2019	2023	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$114,430	Public service activities other than Low/Moderate Income Housing Benefit: 146 Persons Assisted
17	CDS-4 Accessibility	2019	2023	Non-Housing Community Development	County Wide	Community Development Priority	CDBG: \$391,312	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1003 Persons Assisted Other: 3 Other
25	APM-1 Coordination	2019	2023	Non-Housing Community Development administrative management	County Wide	Administration, Planning, and Management Priority	CDBG: \$35,000	Other: 1 Other
26	APM-2 Planning	2019	2023	Non-Housing Community Development administrative management	County Wide	Administration, Planning, and Management Priority	CDBG: \$256,935	Other: 1 Other

Table 6 – Goals Summary

## Goal Descriptions

Annual Action Plan  
2021

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3	Goal Name	HSS-3 Housing Rehabilitation
	Goal Description	Promote and assist in the preservation of existing owner and renter occupied housing stock in the County.
6	Goal Name	HSS-6 Fair Housing
	Goal Description	Affirmatively further fair housing by promoting fair housing choice throughout Lehigh County.
8	Goal Name	HOM-1 Housing
	Goal Description	Promote and assist in developing housing opportunities for homeless persons, families, and those who are at-risk of becoming homeless.
14	Goal Name	CDS-1 Community Facilities
	Goal Description	Assist in improving parks, recreational centers, trails, libraries, and other public and community facilities throughout the County.
15	Goal Name	CDS-2 Infrastructure
	Goal Description	Assist in improving the public infrastructure through rehabilitation, reconstruction, and new construction.
16	Goal Name	CDS-3 Public Services
	Goal Description	Assist in improving and increasing public safety, municipal services, and public service and human service programs throughout Lehigh County.
17	Goal Name	CDS-4 Accessibility
	Goal Description	Assist in improving the physical and visual accessibility of community facilities, infrastructure, and public buildings throughout the County.

25	Goal Name	APM-1 Coordination
	Goal Description	Continue to provide sound and professional planning, program management and oversight for the successful administration of Federal, state, and local funded programs.
26	Goal Name	APM-2 Planning
	Goal Description	Continue to develop and plan for special studies, environmental clearance, fair housing, and compliance with all Federal, state, and local laws and regulations.



## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

Listed below are the FY 2020 CDBG Activities for Lehigh County:

#### Projects

#	Project Name
1	Aspire to Autonomy - Emergency Shelter
2	Catholic Charities - Self-Sufficiency & Intervention Program
3	Communities in Schools of Lehigh Valley - Career Supports at LCTI
4	Lehigh Carbon Community College - ESL for Communication Success
5	LVCIL - PLACE
6	New Bethany Ministries - Staff Salaries of Representative Payee Program
7	NPLS - LMI Legal Help
8	The Literacy Center - ESL & ABE courses
9	Alliance for Building Communities - Mountain View Elevator Rehabilitation
10	CACLV - Roof & HVAC Emergency Replacement Program
11	VHDC - Seneca House
12	Coplay Borough - Fire Department Equipment
13	Fountain Hill Borough - Kieffer St and Jeter Ave Reconstruction
14	Macungie Borough - Memorial Park Association
15	Slatington Borough - #3 - East Franklin Street
16	Whitehall Township - Curb Cuts
17	Alliance for Building Communities - Mountain View Elevator Rehabilitation-Relocation
18	Administration

Table 7 - Project Information

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

Lehigh County has allocated its FY 2021 CDBG funds to principally benefit low- and moderate-income persons.

- The infrastructure improvement activities are either located in a low- and moderate-income census tract/block group or have a low- and moderate-income service area benefit or clientele over 51% low- and moderate-income.
- The Public Services activities are either located in a low- and moderate-income census area or

have a low- and moderate-income services area benefit or clientele.

- The Public Facilities activities are either located in a low- and moderate-income census area or have a low- and moderate-income service area benefit or clientele.
- Demolition of structures that are either located in a low- and moderate-income census area, or fall under removal of slum and blight on a spot basis.
- The housing activities for the first time homebuyers and housing rehabilitation program have an income eligibility criteria, therefore the income requirement restricts funds to low- and moderate-income households throughout the County.
- Economic development projects will either be located in a low- and moderate-income census tract/block group, or a poverty tract greater than 20%, or part of a redevelopment plan, or making 51% of the jobs available to low- and moderate-income population.

The proposed activities and projects for FY 2021 are located in areas of the County with the highest percentages of low- and moderate-income persons, and those block groups with a higher than average percentage of minority persons. The following census tracts and block groups have at least 51% of the households with low- and moderate-incomes:

- C.T. 5100, B.G. 4 – Slatington Borough
- C.T. 6800, B.G. 1 – Fountain Hill Borough
- C.T. 5901, B.G. 5 – Catasauqua Borough
- C.T. 5901, B.G. 4 – Catasauqua Borough
- C.T. 6800, B.G. 2 – Fountain Hill Borough
- C.T. 5703, B.G. 3 – Whitehall Township
- C.T. 5704, B.G. 2 – Whitehall Township
- C.T. 6500, B.G. 2 – Emmaus
- C.T. 5100, B.G. 2 – Slatington Borough
- C.T. 6800, B.G. 4 – Fountain Hill Borough
- C.T. 5704, B.G. 1 – Whitehall Township

AP-38 Project Summary  
Project Summary Information

DRAFT

1	Project Name	Aspire to Autonomy - Emergency Shelter
	Target Area	County Wide
	Goals Supported	CDS-3 Public Services
	Needs Addressed	Homeless Priority
	Funding	CDBG: \$28,000
	Description	Operating costs to start-up a shelter for single, female victims of human trafficking.
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	16 disabled persons will directly benefit from the proposed activities.
	Location Description	Fountain Hill, Pennsylvania
	Planned Activities	The funding will be utilized to cover program expenses such as salaries/payroll expenses including taxes for a one-year period beginning October 1, 2021 through August 31, 2022.
2	Project Name	Catholic Charities - Self-Sufficiency & Intervention Program
	Target Area	County Wide
	Goals Supported	HOM-1 Housing CDS-3 Public Services
	Needs Addressed	Housing Priority
	Funding	CDBG: \$29,700
	Description	Up to 3 months of rent and utility assistance to 25 LMI households. \$20,790 requested for direct assistance. Remaining for casework and operating.
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	The total number of individuals who will be served is between 32-52
	Location Description	Various locations within Lehigh County

	Planned Activities	Many households in Lehigh County continue to struggle with job loss. In addition, rental prices have seen an increase of 6% during the first quarter of 2021 alone. Catholic Charities case workers will help households establish a written service plan with each family's goals, objectives, tasks, and timeframes to achieve self-sufficiency. Targeted clients have an income at or below of Lehigh County Median Area Income and are homeless or near homeless. 26% of the funds will be used for staffing, operating expenses, supplies, and overhead while the remaining 74% of the budget will be used for direct assistance with rent, security deposits, utility payments, and mortgage payments.
3	Project Name	Communities in Schools of Lehigh Valley - Career Supports at LCTI
	Target Area	County Wide
	Goals Supported	CDS-3 Public Services
	Needs Addressed	Community Development Priority
	Funding	CDBG: \$25,000
	Description	Case management of 20 low income, at-risk students who require truancy interventions and additional case-managed support to overcome mental and behavioral health challenges and successfully complete their academic goals at LCTI.
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	20 estimated youth will benefit from the proposed activity
	Location Description	Various locations within Lehigh County
4	Planned Activities	Provide Integrated Student Support to 20 at-risk youth who attend Lehigh Career & Technical Institute and reside in the Lehigh County focus area. Provide guidance on a technical career pathway, improve attendance, and provide career orientated/soft-skills workshops focused on performance in the job market. The funding will be utilized to pay salaries and benefits of the Site Coordinator as well as program materials.
	Project Name	Lehigh Carbon Community College - ESL for Communication Success
	Target Area	County Wide
	Goals Supported	CDS-3 Public Services

	Needs Addressed	Community Development Priority
	Funding	CDBG: \$6,000
	Description	ESL class at Whitehall High School targeted to parents of students to promote strong parental involvement in education by improving their ability to converse with teachers and assist their children with homework. 20 participants.
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	20 persons will directly benefit from the proposed activities
	Location Description	Whitehall High School
	Planned Activities	To provide language and literacy support to the adult population living within Whitehall Township that do not speak English as their first language.
5	Project Name	LVCIL - PLACE
	Target Area	County Wide
	Goals Supported	CDS-3 Public Services
	Needs Addressed	Housing Priority
	Funding	CDBG: \$25,000
	Description	Program will provide 50 consumers with housing options and connect consumers to community services they need to achieve or maintain their independence. Staff will also educate private landlords, property managers, and realtors on the benefits of renting to people with disabilities.
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	50 individuals will benefit from the proposed activities.
	Location Description	The project is located on North 13th Street in Allentown PA.

	Planned Activities	Serve 50 individuals with disabilities and their families through the PLACE program. The program includes comprehensive housing counseling services, intake and referral, supports coordination and follow-along support for people with disabilities living on limited income and at risk of homelessness.
6	Project Name	New Bethany Ministries - Staff Salaries of Representative Payee Program
	Target Area	County Wide
	Goals Supported	CDS-3 Public Services
	Needs Addressed	Homeless Priority
	Funding	CDBG: \$15,430
	Description	The representative payee (RP) program accesses Social Security funds of participants and pays essential bills on their behalf. The CDBG funding would pay for the salaries of staff to carry out the Lehigh County portion of the full RP program, which amounts to 10 clients.
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	12 families will directly benefit from the proposed activities
	Location Description	Bethlehem, PA
	Planned Activities	The New Bethany's Rep Payee program prevents homelessness and sustains self-sufficiency. The program access Social Security funds and pays essential bills on behalf of the client. The requested funding will be utilized to pay the salaries/benefits for the case manager, finance director, and the executive director.
7	Project Name	NPLS - LMI Legal Help
	Target Area	County Wide
	Goals Supported	HSS-6 Fair Housing CDS-3 Public Services
	Needs Addressed	Homeless Priority
	Funding	CDBG: \$10,000
	Description	Housing-related legal aide to 40 LMI people. 2 housing outreach sessions.

	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	40 disabled persons will directly benefit from the propose activities.
	Location Description	Various locations Bethlehem
	Planned Activities	NPLS provides advice, referrals and some direct representation to low-income people who are being evicted, foreclosed, denied house, or are forced to live in uninhabitable conditions. NPLS is requesting a 25% increase in funding to increase from previous funding caseload. The funds will be utilized to pay salaries/benefits for the staff
8	Project Name	The Literacy Center - ESL & ABE courses
	Target Area	County Wide
	Goals Supported	CDS-3 Public Services
	Needs Addressed	Community Development Priority
	Funding	CDBG: \$15,000
	Description	ESL, ABE, and GED instruction to 30 adults
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	30 residents that consider the english language as their second language will directly benefit from the proposed activities.
	Location Description	Various locations in Lehigh County
	Planned Activities	TLC will provide high-quality literacy programs to 30 Lehigh County adults in English as a Second Language (ESL), GED, or Workforce Development programs dependent on need. This program addresses the strategy of Economic Development as they increase and promote job creation, job retention, self-sufficiency, education, job training, technical assistance, and economic empowerment to low and moderate income residents in Lehigh County – Specifically residents living outside of Lower Milford Twp. and the city limits of Allentown and Bethlehem. Funds will pay for Instructor salaries.
9	Project Name	Alliance for Building Communities - Mountain View Elevator Rehabilitation



	Target Area	County Wide
	Goals Supported	CDS-4 Accessibility
	Needs Addressed	Housing Priority
	Funding	CDBG: \$144,000
	Description	Replacement of the elevator in an affordable housing complex.
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	46 disabled persons will directly benefit from the proposed activities
	Location Description	The project is located on Main Street, Slatington, PA 18080
	Planned Activities	Upgrade elevator controls inside and refinish the interior at the Mountain View Apartment building. The Apartment building provides dwellings for low income seniors. The elevators are essential to meet ADA accessibility.
10	Project Name	CACLV - Roof & HVAC Emergency Replacement Program
	Target Area	County Wide
	Goals Supported	HSS-3 Housing Rehabilitation
	Needs Addressed	Housing Priority
	Funding	CDBG: \$225,000
	Description	Assistance to LMI homeowners who are in urgent need of a new roof and/or heat system or hot water heater. Approximately 45 households to be served.
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	45 families will directly benefit from the proposed activities
	Location Description	The proposed project is located on East Fifth Street, Bethlehem, PA 18015

	Planned Activities	The project consists of the replacement of structural deficient roofs and/or HVAC systems in 15 low-to-moderate income homeowners throughout the 36 eligible LMI block groups in Lehigh County. The objective is to bring the homes into compliance with building codes and minimum housing quality standards. Repairs may also improve the energy efficiency of the homes, resulting in cost savings.
11	Project Name	VHDC - Seneca House
	Target Area	County Wide
	Goals Supported	HSS-3 Housing Rehabilitation
	Needs Addressed	Housing Priority
	Funding	CDBG: \$80,000
	Description	Rehabilitate 20 single room occupancy rental units occupied by extremely-low income residents with special needs.
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	23 disabled persons will directly benefit from the proposed activities.
	Location Description	The project is located on Seneca Street, Bethlehem PA (Fountain Hill Boro)
	Planned Activities	Rehabilitate house for 20 extremely-low income residents with special needs residing in the Borough of Fountain Hill. The 20 single-room occupancy units comprise a section of the Mill 2 affordable housing project operated by Valley House Development Corporation.
12	Project Name	Coplay Borough - Fire Department Equipment
	Target Area	County Wide
	Goals Supported	CDS-1 Community Facilities
	Needs Addressed	Community Development Priority
	Funding	CDBG: \$40,636
	Description	The project's objective is to replace outdated life-saving equipment for the Fire Department which includes a breathing air compressor, a carbon monoxide monitor, and installation of the equipment.

	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	3,205 families will directly benefit from the proposed activities
	Location Description	The project location is at the Coplay Fire Department Building located at 165 Cherry Street, Coplay, PA 18037
	Planned Activities	The project's objective is to replace outdated life-saving equipment for the Fire Department which includes a breathing air compressor, a carbon monoxide monitor, and installation of the equipment.
13	Project Name	Fountain Hill Borough - Kieffer St and Jeter Ave Reconstruction
	Target Area	County Wide
	Goals Supported	CDS-4 Accessibility
	Needs Addressed	Community Development Priority
	Funding	CDBG: \$134,100
	Description	"Kieffer Street - \$218,300Jeter Ave - \$134,100"
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	930 persons will directly benefit from the proposed activities
	Location Description	The project is located Kieffer Street & Jeter Avenue.
	Planned Activities	Construction and/or replacement of curb ramps to be ADA compliant and provide accessibility. Replacement of the curb and sidewalk where necessary to provide a safe pedestrian travel path for residents walking along Kieffer street and Jeter Avenue.
14	Project Name	Macungie Borough - Memorial Park Association
	Target Area	County Wide
	Goals Supported	CDS-1 Community Facilities
	Needs Addressed	Community Development Priority
	Funding	CDBG: \$6,595
	Description	Handicap Accessible Bathroom

	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	381 disabled persons will directly benefit from the proposed activities
	Location Description	The project is located on 50 Poplar Street, Macungie, PA 18062
	Planned Activities	The plan is to take two existing (not currently in use) small bathrooms which share a cement block wall and combine them into one large handicap accessible ADA compliance bathroom.
15	Project Name	Slatington Borough - #3 - East Franklin Street
	Target Area	County Wide
	Goals Supported	CDS-2 Infrastructure
	Needs Addressed	Community Development Priority
	Funding	CDBG: \$95,069
	Description	From Main Street to 2nd Street. 5100-2 54.14%
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	1,810 disabled persons will directly benefit from the proposed activities.
	Location Description	East South Street & Fairview Ave, Slatington, PA 18080
	Planned Activities	Improvements to the roadway from East South Street from 2nd Street to Fairview Avenue which include resurfacing. Install an ADA ramp at the intersection of East South Street and 2nd Street with pavement restoration.
16	Project Name	Whitehall Township - Curb Cuts
	Target Area	County Wide
	Goals Supported	CDS-4 Accessibility
	Needs Addressed	Community Development Priority
	Funding	CDBG: \$113,212

	Description	"PA Street from Mauch Chunk to Richland (8 CC) - \$50,400Tremont St from 9th to 10th St. (4 CC) - \$25,200Quarry from Mulberry to 2nd St (6 CC) - \$37,8002nd St from Lehigh to Carbon St (5 CC) - \$31,500Carbon from Second to Third St (4 CC) - \$25,200"
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	The project will address various Streets within the Township
	Planned Activities	Updating or installing 27 handicap accessible ramps at various locations throughout the township to provide universal accessibility to all but particularly disabled or motor limited individuals.
17	Project Name	Alliance for Building Communities - Mountain View Elevator Rehabilitation-Relocation
	Target Area	County Wide
	Goals Supported	APM-1 Coordination
	Needs Addressed	Housing Priority
	Funding	CDBG: \$35,000
	Description	ABC is applying for a second CDBG grant to modernize the elevator at its Mountain View Apartments - a multi-story facility with 46 low income rental units for seniors & the disabled. They must provide alternate housing for 9 tenants unable to access their upper story apartments while the elevator is out of service.
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	9 disabled persons will be directly affected from the propose activities.
	Location Description	The project is located at 550 Main Street, Slatington, PA 18080

	Planned Activities	ABC is applying for a second CDBG grant to modernize the elevator at its Mountain View Apartments - a multi-story facility with 46 low income rental units for seniors & the disabled. They must provide alternate housing for 9 tenants unable to access their upper story apartments while the elevator is out of service.
18	Project Name	Administration
	Target Area	County Wide
	Goals Supported	APM-1 Coordination APM-2 Planning
	Needs Addressed	Administration, Planning, and Management Priority
	Funding	CDBG: \$256,935
	Description	Funds for oversight, management, and administration of the CDBG program
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	The Regulatory Citation is General Program Administration, 570.206. The Matrix Code is 21A, General Program Administration

## AP-50 Geographic Distribution – 91.220(f)

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

Lehigh County undertakes projects using CDBG funds in Low- and Moderate-Income areas of the County. Many of the Boroughs in the County have high Low- and Moderate-Income populations, and projects are frequently targeted to these areas. Additionally, Lehigh County is an exception grantee where at least 37.58% of households with low- and moderate-incomes are CDBG eligible. There are no racially or ethnically concentrated areas of poverty within Lehigh County's CDBG jurisdiction.

The following information provides a profile of the population, age, and racial/ethnic composition of Lehigh County. This information was obtained from the U.S. Census Bureau website, <http://census.gov>. The 2015-2019 American Community Survey 5-Year Estimates were used to analyze the social, economic, housing, and general demographic characteristics of Lehigh County. The 5-year estimates are the most recent data available for the County. The 2019 U.S. Census data is included where possible.

Racial/ethnic composition of Lehigh County from the 2019 U.S. Census:

- 82.4 are White
- 26.2% are Hispanic
- 9.9% are Black or African American

The median income for a family of four (4) in the Allentown-Bethlehem-Easton, PA HUD Metro FMR Area is \$49,558 for 2021. At the time of the 2015-2019 American Community Survey, median household income in Lehigh County was \$63,897 which was higher than the Commonwealth of Pennsylvania (\$61,744).

In Lehigh County, the overall percentage of low- and moderate-income (LMI) persons was 28.23% in 2015, while the First Quartile Low/Mod rate established by HUD is 37.58%. A total of 11 census tract and block groups across the County had a majority (i.e., more than 51.0%) of persons with incomes at or below 80% of the Median Family Income (MFI). A total of 25 block groups in the County had a Low/Mod rate equal to or greater than the First Quartile Low/Mod rate of 37.58%.

According to the U.S. Labor Department, the non-seasonally adjusted unemployment rate for Lehigh County in April 2021 was 6.3%, which was slightly lower than the seasonally adjusted preliminary rate of 7.4% for the Commonwealth of Pennsylvania in April 2021. The seasonally adjusted national unemployment rate for May 2021 was 5.5%.

Lehigh County will provide CDBG funds to activities principally benefitting low/mod income persons in the participating jurisdictions of the Urban County. Such assistance is not directed to any specific

geographic area, but based on income benefit.

Areas of primary concern are those where race and income concentrations overlap. Low-income census tracts with concentration of Hispanic residents occur in: Whitehall Township, Catasauqua Borough, and Hanover Township.

### Geographic Distribution

Target Area	Percentage of Funds
County Wide	100

Table 8 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

The proposed activities and projects for FY 2021 are located in areas of the County with the highest percentages of low- and moderate-income persons, and those block groups with a higher than average percentage of minority persons. The following census tracts and block groups have at least 51% of the households with low- and moderate-incomes:

- C.T. 5100, B.G. 4 – Slatington Borough
- C.T. 6800, B.G. 1 – Fountain Hill Borough
- C.T. 5901, B.G. 5 – Catasauqua Borough
- C.T. 5901, B.G. 4 – Catasauqua Borough
- C.T. 6800, B.G. 2 – Fountain Hill Borough
- C.T. 5703, B.G. 3 – Whitehall Township
- C.T. 5704, B.G. 2 – Whitehall Township
- C.T. 6500, B.G. 2 – Emmaus
- C.T. 5100, B.G. 2 – Slatington Borough
- C.T. 6800, B.G. 4 – Fountain Hill Borough
- C.T. 5704, B.G. 1 – Whitehall Township

Additionally, because Lehigh County is an exception grantee and all Census Tracts where at least 37.58% of households with low- and moderate-incomes are CDBG eligible, the following Census Tracts and Block



Groups are eligible:

- C.T. 6500, B.G. 3 – Emmaus Borough (50.53% LMI)
- C.T. 5602, B.G. 3 – Whitehall Township (49.67% LMI)
- C.T. 5902, B.G. 1 – Hanover Township (47.52% LMI)
- C.T. 5200, B.G. 3 – Washington Township (46.51% LMI)
- C.T. 5301, B.G. 2 – Heidelberg Township (46.23% LMI)
- C.T. 5704, B.G. 1 – Whitehall Township (46.21% LMI)
- C.T. 6903, B.G. 2 – Upper Saucon Township (45.87% LMI)
- C.T. 5302, B.G. 3 – Lynn Township (45.65% LMI)
- C.T. 6701, B.G. 3 – Salisbury Township (45.42% LMI)
- C.T. 5800, B.G. 3 – Coplay Borough (45.30% LMI)
- C.T. 5800, B.G. 1 – Coplay Borough (44.76% LMI)
- C.T. 5702, B.G. 3 – Whitehall Township (44.48% LMI)
- C.T. 6703, B.G. 3 – Salisbury Township (44.13% LMI)
- C.T. 5703, B.G. 2 – Whitehall Township (42.94% LMI)
- C.T. 5800, B.G. 2 – Coplay Borough (41.60% LMI)
- C.T. 5200, B.G. 2 – Washington Township (41.52% LMI)
- C.T. 5901, B.G. 1 – Catasauqua Borough (41.36% LMI)
- C.T. 6303, B.G. 1 – Macungie Borough (41.25% LMI)
- C.T. 6303, B.G. 3 – Macungie Borough (41.15% LMI)
- C.T. 5702, B.G. 2 – Whitehall Township (40.44% LMI)
- C.T. 5200, B.G. 1 – Washington Township (39.62% LMI)
- C.T. 5602, B.G. 4 – Whitehall Township (39.52% LMI)
- C.T. 6001, B.G. 2 – South Whitehall Township (39.20% LMI)
- C.T. 5506, B.G. 2 – North Whitehall Township (38.29% LMI)
- C.T. 5705, B.G. 2 – Whitehall Township (37.58% LMI)

Rationale for funding activities were based on the eligibility of the activity, the activity must meet a national objective, and evidence must be presented on the need in the community or by the agency/organization. Additional consideration was given based on the community's or the agency/organization's past history of expenditure of the CDBG funds, the ability to leverage other funds for this activity, and whether the FY 2021 request was related to projects that if not funded, would result in a special assessment against low-income homeowners. Finally, a high priority was given to activities based on the community's or agency's/organization's ability to complete the project in a timely

manner.

Discussion

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

Lehigh County will utilize its CDBG funds to rehabilitate housing units and provide subsistence payments. The one year goals for affordable housing in Lehigh County for FY 2021 are as follows:

One Year Goals for the Number of Households to be Supported	
Homeless	66
Non-Homeless	0
Special-Needs	168
Total	234

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	34
The Production of New Units	0
Rehab of Existing Units	68
Acquisition of Existing Units	0
Total	102

Table 10 - One Year Goals for Affordable Housing by Support Type

#### Discussion

## AP-60 Public Housing – **91.220(h)**

### Introduction

The Lehigh County Housing Authority (LCHA) aims to address the needs of the extremely low-income, very low-income, and lower-income residents of Lehigh County. The mission of the Lehigh County Housing Authority is to provide affordable housing in the most efficient and effective manner to qualified individuals in accordance with the rules and regulations prescribed by the U.S. Department of Housing and Urban Development (HUD), the Commonwealth of Pennsylvania, the County of Lehigh and/or any other entity providing funding for affordable housing programs. This is done through LCHA assisting individuals and families through its public housing communities and Section 8 Housing Choice Vouchers. The Housing Authority promotes homeownership through its Family Self-Sufficiency Program.

### Actions planned during the next year to address the needs to public housing

Each year, the Lehigh County Housing Authority (LCHA) receives an allocation of funds from HUD under the Capital Fund Program to undertake physical improvements. In addition, the LCHA receives operating subsidies to offset the operating deficits associated with public housing units and to carry out maintenance. The Lehigh County Housing Authority anticipates that it will receive \$545,914.00 under a HUD Capital Fund grant for FY 2021 that it will use to repair tenant parking lot at Ridge Manor, Cherokee/Delaware kitchen remodeling, 7th St Village siding replacement, and George Dilliard Manor parking lot expansion.

The FY 2021 allocation will be used for the following activities:

- Operations \$50,629.90
- Administration \$50,629.90
- Fees and Costs \$25,000.00
- Dwelling Structures \$419,656

Total: \$545,914

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

Lehigh County supports the Housing Authority's efforts to work with tenants of public housing and Section 8 Housing Choice Vouchers to achieve self-sufficiency. There are no joint projects planned for the FY 2020 program year. There are currently no Resident Councils at properties owned and managed by the Lehigh County Housing Authority. Previous attempts have been made at the creation of Citizen Councils. However, these councils have all disbanded. Family Self-Sufficiency (FSS) programs are

provided to Section 8 Housing Choice Voucher holders. FSS program residents work with a case manager to develop goals that will, over a five (5) year period, lead to self-sufficiency. These goals may include education, specialized training, job readiness, job placement activities, and career advancement objectives. The goals for each participating family member are set out in Individual's Training and Service Plan. LCHA has a baseline of 1,652 Section 8 Housing Choice Vouchers, with 184 applications on the waiting list as of June 1, 2021. The Lehigh County Housing Authority has selected residents to access and review the Annual Action Plan when available.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

The Lehigh County Housing Authority is not designated as "troubled" by HUD and is performing satisfactorily according to HUD guidelines and standards.

Discussion

Not applicable.

## AP-65 Homeless and Other Special Needs Activities – 91.220(i)

### Introduction

Lehigh and Northampton Counties are served by the Lehigh Valley Regional Homeless Advisory Board (LVRHAB), which is a subdivision of the Eastern PA CoC. According to the Governance Charter for the Eastern PA Continuum of Care Collaborative, the mission of the Eastern PA CoC is to end homelessness throughout the 33-county Continuum of Care. The CoC works toward ending homelessness by providing a framework for a comprehensive and well-coordinated regional and local planning process. This includes identifying needs, conducting a system-wide evaluation of existing resources and program activities, and building a system of housing and services that addresses those needs. This mission is pursued through the development of long-range plans to prevent and end homelessness in the geographic area, as well as the coordination necessary for successful implementation. The objectives of the CoC include the following:

- Promote development of adequate funding for efforts for preventing homelessness, rapidly re-housing homeless persons, and stabilizing their housing;
- Maximize potential for self-sufficiency among individuals and families experiencing homelessness; and
- Promote full access to, and effective use of, mainstream programs.

The LVRHAB Funding Committee is responsible for project selection and ranking for submission through the CoC's annual HUD application. In this capacity, the Committee reviews all documents from the previous funding round; sets a schedule and time line for the current funding round; develops and edits forms for new project and renewal evaluations; develops ranking criteria; collaborates with the Data Management, Collection, and Outcomes Committee, as necessary; and provides ranking reports to the CoC. In order to increase CoC-wide performance, ensure the strategic use of HUD funds, and develop new resources, the Funding Committee is also in charge of developing the CoC's reallocation strategy, which includes setting policy addressing funding cuts or allocation of additional resources in response to HUD's Continuum of Care NOFA.

The CoC provides funds for projects that assist homeless populations in the area through CoC funding and creates partnerships with other entities to utilize additional sources of funding. The City of Allentown receives ESG funds and is included with the local homeless coalition, along with representatives of various stakeholders and service providers. The CoC also funds Shelter Plus Care projects and Supportive Housing Programs (SHP) through the Lehigh County Housing Authority and its development entity, the Valley Housing Development Corporation.

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 Continuum of Care completes a regular “Point in Time Count Survey” each January to determine the number of homeless individuals and families in the Eastern Pennsylvania Region. Based on the Point in Time Count (PITC) conducted during January 22, 2020, the following numbers of homeless persons were reported in Lehigh County: (January 2021 PIT data has not been finalized)

- Unsheltered Persons - 366 individuals: 249 were male, 116 were female, and 1 was transgender.
- Unsheltered Households – 276 households, of which 13 had children under the age of 18.
- Sheltered (in Warming Center) – 1,147 individuals: 594 were male, 550 were female, 2 were transgender, and 1 unknown.
- Transitional Housing: 519 persons; 306 households, of which 216 are without children and 90 households with at least 1 adult and one child.
- Emergency Shelter: 333 persons; 754 households, of which 192 had children under the age of 18.
- Homeless Veterans - Of those counted, 49 were sheltered veterans and 8 was an unsheltered veteran.

Unsheltered homelessness is not common in the mostly rural Eastern PA CoC. The largest percentage of unsheltered homeless are typically located in Lehigh, Northampton, and Monroe Counties. Ongoing street outreach occurs in these three (3) counties. Lehigh Carbon Community College in the Lehigh Valley tracks unsheltered persons in their Efforts to Outcomes (ETO) database. Identified persons are provided with immediate shelter and services. Intake and permanent housing placement occur as quickly as possible.

In the entire Eastern Pennsylvania CoC, there were 337 unsheltered persons, 445 persons in transitional shelter, and 1,061 in emergency shelter. There were 467 children under the age of 18, with 143 in a transitional shelter and 317 in an emergency shelter. During the 2019 PIT Count, 1,843 people were identified as experiencing homelessness in the Eastern PA CoC. There has been a 29% decline in homelessness in the Eastern PA CoC from 2016 to 2019.

CoC policies require all Permanent Supportive Housing (PSH) projects to prioritize beds based on Notice 14-012, “Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status”, which directs Permanent Supportive Housing resources to those with the greatest “Length of Time Homeless” (LOTH). However, some PSH projects have had very little turnover since the adoption of the policy.

The biggest risk factors of homelessness continued to be: 1) a person or family doubled-up with another family, 2) being released from a psychiatric facility, 3) being released from a substance abuse treatment

facility, or 4) being released from a correctional facility. The Data points to the need to identify which institutions within the 33-County Eastern PA CoC were not using adequate discharge planning, and to improve their coordination with the CoC. To reduce first-time homelessness, the CoC has increased its homeless prevention resources through PHARE (Marcellus Shale fees), ESG, Supportive Services to Veteran Families (SSVF), and other funds. The Coordinated Entry pilot program, recently approved by the 33-county Eastern PA CoC, began in the Lehigh Valley in December 2016.

## Addressing the emergency shelter and transitional housing needs of homeless persons

While the County did not apply for any ESG funds in FY 2017, the County applied for a PADCED Emergency Solutions Grant (ESG) in FY 2016 in the amount of \$177,101 for renovations to the Sixth Street Shelter operated by the Community Action Committee of the Lehigh Valley, and homeless prevention and rapid re-housing services through Catholic Charities. The County was approved for \$154,483 which included: administration (\$5,783/ Lehigh County staff hours only), HMIS (\$1,500) and renovations (\$147,200) at the Sixth Street Shelter only. The Sixth Street Shelter matched the ESG funds with Human Services Block Grant (HSBG) funds. In FY 2019, the Lehigh Valley received \$309,507 and will use these funds during 2020 and 2021 for Street Outreach (Lehigh Conference of Churches) in the amount of \$25,000, Rapid Rehousing (Salvation Army) in the amount of \$60,000, Homelessness Prevention (Catholic Charities \$25,216, New Bethany Ministries \$60,555, and the Third Street Alliance \$82,130) in the total amount of \$167,901, Emergency Shelter (Salvation Army) in the amount of \$45,000, and \$11,606 for administration of the programs. In FY 2020, the Lehigh Valley received \$207,500 which will be used for Rapid Rehousing in the amount of \$30,000, Rapid Rehousing in the amount of \$140,000, Street Outreach (Lehigh Conference of Churches) in the amount of \$30,000, and \$7,500 (Lehigh County staff hours only) for administration of the programs during 2021 and 2022.

The shelter and transitional housing that is available in Lehigh County included the following:

- Community Action Committee of the Lehigh Valley - Sixth Street Shelter (Emergency Shelter)
- Community Action Committee of Lehigh Valley - Turner Street Apartments (Transitional Housing)
- Salvation Army Emergency Shelter (Emergency Shelter)
- Salvation Army Transitional Shelter (Transitional Housing) Allentown Rescue Mission (Emergency Shelter) Allentown Rescue Mission Christian Living and Values Transitional Program (Transitional Housing) Turning Point of the Lehigh Valley (Domestic Violence) (Transitional Housing) The Program for Women and Families, Inc. (Transitional Housing) Valley Youth House (Emergency Shelter) Valley Youth House - Maternity Group Home (Transitional Housing) Valley Youth House - Supportive Housing for Families (Transitional Housing) Valley Youth House - Supportive Housing for Youth (Transitional Housing)

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

Using HUD System Performance Measure Guidance, the HMIS Lead developed a CoC Performance Report with metrics for “Length of Time Homeless” and reviewed this data with the CoC Data Committee, which meets quarterly to review CoC Performance and identify needed interventions. In 2015, the LOTH in Transitional Housing was 317 days. As such, the CoC reallocated all Transitional Housing projects in FY 2016 and FY 2017 allowing for significant expansion of Rapid Rehousing and Coordinated Entry.

HMIS is used to monitor and record returns to homelessness, which is monitored through the Data Subcommittee each quarter. Based on First Year System Performance Measure results, an overall 12% of persons returned to homelessness within two (2) years. Of these 243 persons, nearly 66% (160) had exited Emergency Shelter. The CoC is significantly increasing Permanent Housing resources through reallocation and Permanent Housing bonuses, which will assist those exiting shelters. Currently, 67% of persons staying in shelters are exiting to Permanent Housing.

Severity of need is taken into consideration in prioritizing people experiencing homeless. This is determined in a number of different ways in the ranking criteria. Specific vulnerabilities considered included chronic homelessness; most significant health and behavioral health needs; youth; and victims of domestic violence. CoC policies require all Permanent Supportive Housing (PSH) projects to prioritize beds to those with the greatest LOTH, but some PSH projects have had very little turnover since the adoption of policy. As a result, the level of vulnerability within PSH projects may widely vary. To adjust for this discrepancy, the ranking included a question measuring “severity of need” based on the vulnerabilities from the Annual Performance Report to HUD. This question asked about additional criteria relevant to vulnerability, including not scoring victims of domestic violence on recidivism, and scoring youth differently on employment outcomes.

At the time of the 2019 PITC, there was one (1) unsheltered Veteran in Lehigh County and eighteen (18) sheltered Veterans. The state’s ESG program prioritizes funding for programs providing homeless services to Veterans, and there are eight (8) Supportive Services for Veteran Families (SSVF) funded organizations providing outreach throughout the 33-countywide CoC. This includes street outreach, marketing, and providing information to shelter residents/staff. SSVF staff works with Veterans to determine eligibility.

The Lehigh Valley Homeless Veteran Task Force was created in February 2015. The Lehigh County Office of Veterans Affairs coordinates the Task Force. The three SSVF providers serving Lehigh and Northampton counties, Hope for Veterans, Catholic Charities, and the Lehigh Valley Center for Independent Living (LVCIL), are the main resource for rapid re-housing and homelessness prevention.

These organizations have the financial resources to provide rental assistance immediately to qualifying veterans. Veterans are also linked to these agencies' Support Coordinators by shelters and community resource providers. The Allentown Housing Authority administers the HUD-VASH program for the Lehigh Valley. This program is coordinated through the Wilkes-Barre VA Medical Center.

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.

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In the Eastern PA Continuum of Care's Five-Year Strategic Plan to Reduce and End Homelessness (2017-2021), the COC outlines the following goals and actions under "Strategy 1: Prevent and Divert Homelessness."

#### A. Evaluate and Improve Discharge Planning where Needed

- Evaluate current discharge planning from these systems to help stem the flow of individuals leaving institutional settings and entering homelessness because they lack stable housing options.
- Research and provide information to other systems/organizations on effective discharge planning policies/procedures for individuals and households at risk of entering homelessness upon discharge, as well as information on available housing resources.
- Engage with statewide efforts to improve discharge planning policies across systems, emphasizing the need for permanent housing placement for those exiting institutions.

#### B. Increase Coordination of Homeless Prevention Sources

- Assess the use of existing funding available for prevention and identify gaps.
- Coordinate funding (including ESG, HAP, PHARE) across the CoC so that resources are used effectively. For example, the CoC may decide to channel prevention resources to geographic areas where emergency shelter access is limited, either due to wait lists or lack of shelter facilities.
- Investigate the use of tools, such as the Prevention VI-SPDAT, to help the CoC more effectively assess households requesting assistance.
- Ensure coordination of prevention activities with Coordinated Entry to increase the

effectiveness of the system.

Furthermore, "Strategy 2" of the COC's Five-Year Strategy Plan focuses on the streamlining of the system and better coordination among housing and social services through the COC's Coordinated Entry System. Lack of resources, combined with the lack of a well-developed coordinated entry process, results in severe hardships for persons experiencing

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Discussion

(Continued)

homelessness who often face long wait times to receive assistance or are screened out of needed assistance. Coordinated entry processes help communities prioritize assistance based on vulnerability and severity of service needs to ensure that people who need assistance the most can receive it in a timely manner. Coordinated entry processes also provide information about service needs and identify gaps to help communities plan their assistance and resources.

The Eastern PA CoC undertook a comprehensive Coordinated Entry planning process including stakeholder input across the CoC via survey and public meetings. Coordinated Entry is currently being piloted in the Lehigh Valley. It was rolled-out to the entire CoC in early FY 2018. A core component of the CoC's ongoing efforts to utilize resources more effectively and reduce unnecessary entries into the homeless system is the implementation of this Coordinated Entry System (CES). As part of the CES, household needs will be assessed and matched with the housing intervention that best addresses their needs. This will allow the CoC to better understand who is entering the homeless system, along with their level of need, and to deploy resources more efficiently across the system. The CoC's Coordinated Entry System Committee will continue to lead the implementation of the CES. The Governing Board will be updated regularly regarding the progress of the CES implementation and provide input as needed.

The value of a coordinated entry system for housing crisis response services is described by the Lehigh

Valley Coordinated Entry Pilot Project below:

- Connects more people to the right solution to end their housing crisis as quickly as possible
- Ensures fair and equal access to services
- Helps overcome geographic, cultural and linguistic barriers to access
- Prioritizes service for families and individuals who are literally homeless and most vulnerable
- Empowers providers to end homelessness rather than simply manage it
- Frees providers to focus on service provision with more accurate information to make decisions
- Improves communications, response time, data collection and efficient use of scarce funding and resources
- Generates better data about community needs, gaps in service, system performance and system/community/provider outcomes
- Supports a “Housing First” approach to exiting people from homelessness to permanent housing with stability and then connecting them to mainstream and community services and benefits

## AP-75 Barriers to affordable housing – 91.220(j)

### Introduction:

Lehigh County completed and submitted the 2018-2022 Analysis of Impediments (AI) report to HUD and FHEO on February 28, 2019. In August 2019, Lehigh County prepared and submitted to HUD an Analysis of Impediments to Fair Housing Choice. The Analysis of Impediments identified the following impediments and strategies:

#### Impediment #1: Increase and Enhance Fair Housing Education and Outreach

1. Facilitate fair housing training for real estate sales persons, municipal officials and planners, landlords, low-income housing developers, housing authority staff, and local mortgage lenders
2. Make presentations annually to local churches, soup kitchens, seniors, housing authority residents and/or nonprofit organizations on fair housing issues.
3. Develop a webpage on the County website dedicated exclusively to fair housing issues. Add the fair housing logo to all federal program materials.
4. Development of an up-to-date, centralized housing database for Lehigh County on a Lehigh County Community Development Office website.
5. Continue to make referrals to the Pennsylvania Human Relations Commission and U.S. Department of HUD in instances of discrimination.
6. Disseminate current information on Fair Housing Rights in the form of posters and pamphlets throughout Lehigh County. In addition, utilize public service announcements on cable television. Notify local municipalities on zoning issues that may impact housing choice. Post HUD's Spanish-language fair housing video on the county's website.
7. Appoint a Fair Housing Officer for Lehigh County.

#### Impediment #2: Continue Support of Affordable Housing Programs

1. Continue the commitment to affordable housing activities (rehabilitation, land banking). These activities provide a valuable opportunity to improve housing choice for members of the protected classes who are most often low- and moderate-income households.
2. Ensure the housing units rehabilitated or constructed with Federal funds comply with ADA requirements and encourage visitable units beyond the minimum requirements.
3. Expand accessibility requirements to universal design for all housing projects financed with federal funds.
4. Support the initiatives of housing providers who work to provide affordable housing for low-income and disabled households.
5. Encourage development of affordable rental housing realizing that not all households should be owners and that decent rental housing stabilizes neighborhoods and creates new homeownership opportunities by moving renters away from single-family homes.
6. Adopt a fair housing resolution to publicly advance fair housing choice.

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

North Penn Legal Services (NPLS) is a sub-recipient of FY 2021 CDBG funds from Lehigh County. NPLS is funded as a public service activity and provides legal aid related to affordable housing, serving low- and moderate-income residents living in Lehigh County outside of Allentown and Bethlehem. NPLS staff provides assistance to residents who face eviction, are denied housing, or are forced to live in uninhabitable conditions. This activity is conducted through workshops held at local social service agencies and in mobile home parks. Information on foreclosures, consumer issues, and fair housing is also provided to the residents of Lehigh County.

In addition, NPLS monitors housing practices and counsels victims of discrimination. NPLS policies and activities promote the awareness of fair housing requirements. They provide consultation to developers and municipalities to ensure that rental and for-sale units are marketed in accordance with the affirmative marketing rules of the U.S. Department of Housing and Urban Development. NPLS ensures that all housing programs and services provided by Lehigh County, its municipalities, and NPLS itself, are administered in a way that promotes fair housing on the basis of race, national origin, religion, gender, disability, and familial status. NPLS' fundamental mission is to increase access to affordable housing for all persons.

The Community Action Committee of Lehigh Valley (CACLV) implements the Community Action Financial Service Program, which will be funded through the Affordable Housing Trust Funds. The program provides homebuyer education, counseling, foreclosure prevention and recovery counseling to LMI persons living within the targeted area of Lehigh County. These areas include Whitehall, Coopersburg, Orefield, Emmaus, Fountain Hill, Coplay, and Slatington. Program outreach is conducted in all of these areas. In addition to the housing counseling services provided to income-eligible persons, at least one (1) home ownership seminar will be conducted within the targeted areas.

The Lehigh Valley Planning Commission's plans to continue to offer the "Beyond Codes: Fair Housing and Inclusionary Zoning" presentation in partnership with North Penn Legal Services to municipalities, their officials, planning commissions and chief administrators. The presentation explains the differences between the Fair Housing Act, inclusionary zoning, and the Uniform Construction Code (PA's building code), as well as what the rights and the obligations are of the municipalities in abiding by the federal and state fair housing regulations. It also offers examples of what municipalities can and cannot do in zoning practice, subdivision and land development regulations, and zoning administration.

#### Discussion:

The Lehigh Valley Planning Commission (LVPC) developed and is promoting the use of their model

ordinances for inclusionary zoning. The model ordinances were made public and are available through the LVPC website ([www.lvpc.org](http://www.lvpc.org)) and the LVPC office. They have been praised by HUD as the standard for Pennsylvania communities to adopt. The titles of the model ordinance and guidance documents include the following: Conservation Subdivisions, Cottage Housing Development, Density Bonuses/Minimum Density, Inclusionary Zoning, Street Connectivity, Traditional Neighborhood Development, and Mixed Use Zoning and Development.

To further promote Fair Housing, the following actions will be implemented by Lehigh County through its Fair Housing Plan by Affirmatively Furthering Fair Housing through various activities noted below:

A Fair Housing Officer has been appointed to administer (responsibilities include accepting complaints, record keeping and investigation in conjunction with NPLS).

Continue to enlist NPLS in the enforcement of fair housing through public education and outreach.

Continue to fund fair housing providers to report housing discrimination complaints.

Continue to investigate testing and auditing of fair housing practices through its regional fair housing providers.

Educate and attempt to overcome the “Not in My Back Yard” (NIMBY) attitude throughout the County through its fair housing providers.

Make every attempt to increase geographic choice in housing by providing links on its website for its low-income households.

Promote desegregation of public housing.

Update its fair housing section on the County website with news and items regarding fair housing (i.e. links to fair housing providers to report housing discrimination).

Assist in the organization of a federally supported community-based system (such as LANTA) that organizes key elements in its community to direct attention to, and help develop strategies to, affirmatively further fair housing.

On an annual basis, Lehigh County will declare, via proclamation, April to be Fair Housing Month.

Outreach to public – provide updated Housing Discrimination information.

## AP-85 Other Actions – 91.220(k)

### Introduction:

Lehigh County has developed the following actions planned to: address obstacles to meeting underserved needs, foster, and maintain affordable housing, reduce lead-based hazards, reduce the number of poverty-level families, develop institutional structures, and enhance coordination between public and private housing and social service agencies.

### Actions planned to address obstacles to meeting underserved needs

Despite efforts made by Lehigh County and social service providers in the County, a number of significant obstacles to meeting underserved needs remain. Funding becomes the greatest obstacle for Lehigh County to meet its underserved needs. Insufficient funding lessens the ability to fund many worthwhile public service programs, activities, agencies, and the needs of local municipalities. Lehigh County will use its CDBG funds to provide assistance to activities that meet the underserved needs of the communities participating in the program. The most difficult obstacle to meeting the needs for affordable housing is a considerable lack of public and private finances to fully address the priorities identified in the Five-Year Strategic Plan. Building the organizational infrastructure to undertake projects and programs that rehabilitate and expand the housing supply is also challenging. In the Lehigh Valley Housing Needs Assessment, the following findings were identified:

- There are opportunities available for more collaborative initiatives between for-profit developers and non-profit organizations in the Lehigh Valley. By partnering with an experienced for-profit developer, a smaller non-profit can enhance its capacity in budgeting, planning, financing, and construction management skills.
- There are also opportunities for public housing authorities to create new affordable housing outside of HOPE VI funding.
- Developers identified the insufficient supply of land zoned for multi-family housing as one of the factors driving up the cost of land acquisition and development. Outreach initiatives focused on educating public officials and planning commissions on the benefits of affordable housing may encourage the rezoning of more land to multifamily zoning designations, as well as eliminate unnecessary and excessive development standards for multi-family housing.
- Active and productive non-profit housing developers need ready access to capital in order to finance the front-end soft costs associated with new development. Utilizing a lesser-restrictive source of financing for this (such as Act 137 Affordable Housing Trust Fund resources) would enable non-profits to seek out additional development opportunities and fully investigate the



financial feasibility of potential projects early on.

The Lehigh Valley Planning Commission has developed various model zoning and land use controls to encourage affordable housing. Lehigh County will continue its work with the Lehigh Valley Planning Commission (LVPC) to develop and promote model ordinances for inclusionary zoning.

Lehigh County has an Affordable Housing Trust Fund. The fund provides support for affordable housing projects in the County.

### Actions planned to foster and maintain affordable housing

Under its FY 2020 CDBG Program, Lehigh County proposes to foster and maintain affordable housing through the following Five Year goals and strategies:

#### GOAL: HOUSING STRATEGY - HSS

HSS-3: Housing Rehabilitation – Promote and assist in the preservation of existing owner- and renter-occupied housing stock in the County.

The County's objectives to meet this goal are:

Five year:

- Rehabilitate 15 owner-occupied housing units.

Annual:

- Rehabilitate eighteen (18) owner-occupied housing units for low- and moderate-income families.

HSS-6: Fair Housing- Affirmatively further fair housing by promoting fair housing choice throughout Lehigh County.

The County's objectives to meet this goal are:

Five year:

- Provide services to help 205 low- to moderate-income clients in Lehigh County.

Annual:

- Provide free housing-related legal help to 40 low- to moderate-income clients in Lehigh County,

including 2 housing outreach sessions.

### Actions planned to reduce lead-based paint hazards

Lead-based paint poses a particular hazard to children under the age of six and is the focus of efforts by the U.S. Department of Housing and Urban Development (HUD) to raise awareness of the problem and mitigate or eliminate the hazard. Lead-based paint was banned in 1978, but housing constructed prior to that time typically contains lead-based paint to some degree. Lead hazards are addressed during housing rehabilitation efforts. All homes built prior to 1978 that receive rehabilitation assistance are tested for the presence of lead-based paint. When evidence of the paint is found, the paint surfaces are removed or the material is encapsulated to prevent exposure.

The EPA guidelines for renovation, paint and repair, effective April 22, 2010, require that all contractors notify owners of properties constructed prior to 1978 of the potential for lead-based paint hazard and to perform work in a lead safe manner. Contractors must be trained and registered with EPA to do work in older homes that disturbs painted surfaces. Local building code officers will be made aware of these requirements. Contractors must provide appropriate notice to owners of properties that will be rehabilitated about the dangers of lead-based paint.

### Actions planned to reduce the number of poverty-level families

Approximately 11.5% of Lehigh County's residents live in poverty, which is slightly less than the Commonwealth of Pennsylvania, where 12.0% of residents live in poverty. Female-headed households with children in the County are particularly affected by poverty, at 36.8%. This information is taken from the 2010-2019 American Community Survey Five-Year Estimates.

Poverty is related to education, job training, and employment. Lehigh County remains committed to addressing the needs of its residents who live at or below the poverty level. The presence of poverty and the related social and economic problems can be a destabilizing element in communities. In Lehigh County, the Community Action Committee of the Lehigh Valley (CACLV) is the official anti-poverty agency. CACLV provides rent and utility assistance, case management, and counseling services to assist with financial management, benefit entitlement assistance, home weatherization to reduce utility costs, furniture and household goods, alcohol and mental health counseling, foreclosure mitigation counseling, child care, transportation to work for up to six (6) months and assistance in purchasing a dependable vehicle, and other various programs that empower low-income households.

Lehigh County provides CDBG funds to public service agencies to assist households below the poverty level with services and program support. The County will work with service providers to pursue resources and innovative partnerships to support the development of affordable housing, homelessness prevention, and emergency food and shelter. Lehigh County funded several projects with FY 2021 CDBG funds to assist residents and families living in poverty: Catholic Charities – Self-sufficiency & Intervention Program – \$29,700.00; Lehigh Carbon Community College Foundation – ESL for

Communication Success - \$6,000.00; Lehigh Valley Center for Independent Living – People Living in Accessible Community Environments (PLACE) Program – \$25,000.00; New Bethany Ministries – Staff Salaries for Representative Payee Program - \$15,430.00; North Penn Legal Services – LMI Legal Help – \$10,000.00; The Literacy Center – ESL, GED & ABE Courses – \$15,000.00.

To assist with economic development and to promote job creation, Lehigh County administers various programs and supports agencies for economic development:

- Lehigh County works in conjunction with Lehigh Valley Economic Development Corporation (LVEDC), community organizations, other economic development groups and the Workforce Investment Board to help enhance programs and create opportunities in the County.
- LVEDC is able to provide manufacturing, industrial, and nonprofit organizations with low-interest financing generated through tax exempt revenue bonds.

Pennsylvania CareerLink® Lehigh Valley offers job search counseling, skills assessment programs, GED courses, information on training programs and workshops on many subjects, including resume writing and interview skills. Considered a one-stop location for all employment needs, CareerLink offers a multi-faceted approach to the job market.

#### Actions planned to develop institutional structure

The primary responsibility for the administration of the Annual Action Plan is assigned to the Lehigh County Department of Community and Economic Development. This agency coordinates activities among local municipal governments, public and private organizations, in their efforts to implement different elements and to realize the prioritized goals of the Annual Action Plan.

In order to address the County's housing and community development needs, the County has established an extensive public-private partnership aimed at revitalization in the County. In 2020, the partnership includes the following agencies:

- North Penn Legal Services  
Catholic Charities, Diocese of Allentown  
Lehigh Valley Center for Independent Living (LVCIL)  
The Literacy Center  
Lehigh Conference of Churches  
Communities in Schools of Eastern PA

Lehigh County consults with business and civic leaders during its planning process for the preparation of

its Annual Action Plan and Five Year Consolidated Plan. This includes, but is not limited to, the following:

- The Greater Lehigh Valley Chamber of Commerce
- Community Action Committee of the Lehigh Valley
- Lehigh Valley Workforce Development Board
- Local elected officials

The County hired a third-party vendor, Community Grants, Planning & Housing, LLC (CGP&H) to implement its County-wide housing rehabilitation program and Accessibility and Rehabilitation Improvements for the Elderly (ARIE). CGP&H is continuing its work with the County to ensure that the housing rehabilitation program provides assistance to lower income homeowners.

Lehigh County is part of the Lehigh Valley Regional Housing Advisory Board. To promote a more local approach, the City of Allentown has initiated a planning process that will require regional support. Lehigh County has been supportive of this initiative.

The Lehigh Valley Planning Commission will also be the entity responsible for performing project oversight required under Executive Order 12372. HUD has acknowledged that the Commonwealth of Pennsylvania no longer has a standing committee for this required function and has asked jurisdictions instead to utilize committees under Section 204 of the Demonstration Cities and Metropolitan Development Act of 1966. This function will be carried out by the Lehigh Valley Planning Commission.

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

The primary responsibility for the administration of the Annual Action Plan is assigned to Lehigh County's Department of Community and Economic Development. This agency will coordinate activities among local municipalities, public, and private organizations in their efforts to implement different elements and to realize the prioritized goals of the Annual Action Plan. The County is committed to continuing its participation and coordination with public, housing, and social service organizations. The County solicits applications for CDBG funds. In addition, the County sends out applications to a list of agencies, organizations, housing providers, and local municipalities that have previously submitted an application or which have expressed an interest in submitting an application. The applications are reviewed by the Department of Community and Economic Development staff and any questions are discussed with the applicant.

The Affordable Housing Task Force is a regional group that includes Lehigh County. This group is developing the tools for and interest of the local municipalities for inclusionary zoning, cottage housing development, density bonuses, and transit-oriented development.

The Lehigh Valley Economic Development Corporation (LVEDC) was awarded a Sustainable Communities

Regional Planning Grant from HUD during Lehigh County's Five Year Consolidated Plan period of 2012-2016. Through this effort, that Five-Year Strategic Plan and the larger regional plan was being prepared. As described in Prosper Lehigh Valley, a blog on economic development in the Lehigh Valley, eleven (11) agencies came together to apply for this grant through the U.S. Department of Housing and Urban Development (HUD). This grant was one of a few programs that was made possible through the Federal Office of Sustainable Communities, a historic collaboration among HUD, U.S. Department of Transportation, and the U.S. Environmental Protection Agency. Locally, the eleven (11) partners applied through the Lehigh Valley Economic Development Corporation as the Lehigh Valley Sustainability Consortium (LVSC).

The members of the LVSC consist of:

1. Lehigh County Department of Community and Economic Development
2. Northampton County Department of Community and Economic Development
3. Lehigh Valley Planning Commission
4. Lehigh and Northampton Transportation Authority
5. Community Action Committee of the Lehigh Valley
6. The Wildlands Conservancy
7. Lehigh Valley Economic Development Corporation
8. Renew Lehigh Valley
9. City of Allentown
10. City of Bethlehem
11. City of Easton

Discussion:

Performance monitoring is an important component in the long-term success of the County's Community Development Block Grant (CDBG) Program. The County, through the Department of Community and Economic Development (DCED), has developed standards and procedures for ensuring that the recipients of CDBG funds meet the regulations and that funds are disbursed in a timely fashion. The County has promulgated sub-recipient monitoring procedures and developed checklists to ensure that each activity is completed in a manner consistent with the requirements of the Community Development Block Grant Program. Municipal sub-recipients are desk audited through submission of quarterly and annual reports.

The DCED staff regularly monitors the progress of every activity to ensure timeliness. Municipal projects and sub-recipients are held to a performance schedule through contract obligations. When these milestones are not met, the DCED staff works closely with the municipality to get the project back on

track or reallocate the funds.

The DCED's standards and procedures for monitoring are designed to ensure that:

- Objectives of the National Affordable Housing Act are met,
- Program activities are progressing in compliance with the specifications and schedule for each program, and
- Recipients are in compliance with other applicable laws, implementing regulations, and with the requirements to affirmatively further fair housing and minimize displacement of low-income households.

Activities of sub-recipient non-profit agencies will be closely monitored and will include review and approval of budgets, compliance with executed grant agreements, review and approval of vouchers, review of fiscal reports on a quarterly basis, and a review of audits on an annual basis. Monitoring will also occur through on-site monitoring visits. These visits will occur as necessary, but will be conducted at least once a year.

All sub-recipients must identify the personnel working on the project, keep accurate records and filing systems to document program benefits and compliance, maintain an appropriate financial management system and submit an audit.

There are monitoring responsibilities that go beyond the time of completion of various activities. The overall performance of the program relative to the Five-Year Strategic Plan goals is monitored at least bi-annually through the selection of the annual activities and again during the preparation of the Comprehensive Annual Performance and Evaluation Report (CAPER). If it appears that proposed goals are not being addressed, the County will re-evaluate the goals, project performance and determine the course of action needed to bring the program into compliance.

## Program Specific Requirements

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

#### Introduction:

Lehigh County receives an annual allocation of CDBG funds. The County does not expect to generate program income from any CDBG funded activities in FY 2021. The County-wide Housing Rehabilitation program has a five (5) year forgivable loan period. However, should the owner of the residence sell, move, or the residence is no longer its principal residence, the owner would have to repay a prorated portion of the loan to the County. Repayment is based on the time the homeowner resided in the residence during the lien period. Since the County receives a CDBG Federal allocation, the questions below have been completed, as applicable.

Lehigh County has allocated \$256,935.00 for general administration of the CDBG Program, which is at the 20% administrative cap. The County has allocated \$154,130.00 to public service activities, which is below the 15% public service cap. Since this cap was suspended for FY 2020, Lehigh County allocated funding at 18.4%, which includes COVID-19-related activities for two organizations. The balance of funds will be allocated to activities which principally benefit low- and moderate-income persons in the amount of \$873,612.00 (68.0%).

#### CDBG Program Income:

- Lehigh County does not anticipate the receipt of Program Income during this program year.

#### CDBG Percentages:

- Administrative Percentage: 20.0%
- Public Service Percentage: 12.0%
- Low- and Moderate-Income Percentage: 68.0%

### 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 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 |

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4. The amount of any grant funds returned to the line of credit for which the planned use has not 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	0
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.	100.00%

Does the County plan to limit beneficiaries or give preferences to a particular segment of the low-income population?

Lehigh County does not limit the beneficiaries or give preferences to a particular segment of the low-income population. The County assists on a first come, first serve basis for its Housing Rehabilitation Program.





## Attachments

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# CITIZEN PARTICIPATION

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OMB Control No: 2506-0117 (exp. 09/30/2022)

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**Subject:** 2021 CDBG Applications Due 4/15/21  
**Date:** Thursday, March 11, 2021 8:59:00 AM  
**Attachments:** [2021 CDBG Application - Public Facilities Construction and Other.pdf](#)  
[2021 CDBG Application - Public Services.pdf](#)  
[2021 CDBG Application Cover Letter.pdf](#)

#### Prospective 2021 CDBG Applicants:

Lehigh County is now accepting applications for the 2021 Community Development Block Grant program. Attached please find the Application Cover Letter, which explains the application process and highlights key deadlines, as well as the application forms. These documents, as well as all reference materials, can be found on the Lehigh County website at the following location:  
<http://www.lehighcounty.org/Departments/Community-Economic-Development/CDBG-Grant-Application>

Applications must arrive at the Lehigh County Office of Community Development by April 15, 2021 in order to be considered for funding. Please reference the cover letter for public hearing dates and application submittal methods.

Please note – this application is different than the CDBG-CV application, both available at <http://www.lehighcounty.org/Departments/Community-Economic-Development>. The CDBG-CV applications are being accepted on a rolling basis until the allocation is fully expended. The 2021 CDBG application has a deadline of April 15, 2021.

Regards,

*Laurie Moyer*

Grants & Housing Manager

County of Lehigh

Government Center

17 South 7<sup>th</sup> Street

Allentown, PA 18101

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2021 CDBG NOFA

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[<dwticzak@acelaeng.com>](mailto:dwticzak@acelaeng.com); 'Jill Smith' [<jsmith@hanovereng.com>](mailto:jsmith@hanovereng.com); 'Rich Fain, CSI, CCCA' [<rfain@barrysett.com>](mailto:rfain@barrysett.com); 'Janice Meyers' [<jmeyers75@ptd.net>](mailto:jmeyers75@ptd.net); 'jmeyers@whitehalltownship.com'; 'travers@catasauqua.org'; 'ndischinat@lvwib.org'; 'ndischinat@workforcelv.org'; 'gkomanik@workforcelv.org'; 'Lisa Walkiewicz' [<l.walkiewicz@vianet.org>](mailto:l.walkiewicz@vianet.org); 'David Lear' [<DLear@lehighengineering.com>](mailto:DLear@lehighengineering.com); 'publicworks@coplayborough.org'; 'Kim Bachman' [<kimb@coplayborough.org>](mailto:kimb@coplayborough.org); 'greese@lvpc.org'; 'jscott@communityfirstfund.org'; 'ohinson@allentowndiocese.org'; 'mbertalan@allentowndiocese.org'; 'dbosket@cacvl.org'; 'sethoderewski@lvcil.org'; 'debbierozear@lvcil.org'; 'deidre.govan@use.salvationarmy.org'; 'kshoemaker@arcofhighnorthampton.org'; 'harrisw1@lcti.org'; 'ldelabar@casalv.org'; 'Coplay Mayor Dean Molitoris' [<ccoplaymayor@gmail.com>](mailto:ccoplaymayor@gmail.com); 'Joan Cheesbrough' [<slatebor@ptd.net>](mailto:slatebor@ptd.net); 'cgarges@hanleco.org'; 'bbeitel@lowermac.com'; 'mayor@whitehalltownship.com'; 'Victoria Coyle' [<VickiC@mowglv.org>](mailto:VickiC@mowglv.org); 'Tina Sargent' [<tsargent@newbethanyministries.org>](mailto:tsargent@newbethanyministries.org); 'Lori Molloy' [<lmolloy@northpennlegal.org>](mailto:lmolloy@northpennlegal.org); 'Becky Bradley' [<bab@lvpc.org>](mailto:bab@lvpc.org); 'mkovaichick@lccc.edu'; 'Deanne Best' [<DMalaccs@lehighchurches.org>](mailto:DMalaccs@lehighchurches.org); 'Adrian Shanker' [<Adrian@bradburysullivancenter.org>](mailto:Adrian@bradburysullivancenter.org); 'Alisa Baratta' [<abaratta@thirdstreetalliance.org>](mailto:abaratta@thirdstreetalliance.org); 'Deborah Nevels' [<dnevels@hanovereng.com>](mailto:dnevels@hanovereng.com); 'Derek Petroski' [<dpetroski@kceinc.com>](mailto:dpetroski@kceinc.com); 'Dawn Godshall' [<dgodshall@cacvl.org>](mailto:dgodshall@cacvl.org); 'ddietrich@nhsgreaterberks.org'; 'glandi@allentowndiocese.org'; 'tdakuginow@allentowndiocese.org'; 'jmriddle@newbethanyministries.org'; 'Katie Suppes' [<katie@bradburysullivancenter.org>](mailto:katie@bradburysullivancenter.org); 'Matt Easternwood' [<matt@bradburysullivancenter.org>](mailto:matt@bradburysullivancenter.org); 'Robert Glisson' [<manager@macungie.pa.us>](mailto:manager@macungie.pa.us); 'Kate Cohen' [<katecohen@gv-ymca.org>](mailto:katecohen@gv-ymca.org); 'publicworks@coplayborough.org'; 'cyfvet@aol.com'; Vicki Piontek [vicki.piontek@gmail.com](mailto:vicki.piontek@gmail.com); [eric@kellyn.org](mailto:eric@kellyn.org); Meagan Grega MD [meagan@kellynfoundation.org](mailto:meagan@kellynfoundation.org); [kjordan@cacvl.org](mailto:kjordan@cacvl.org); Emily Forrester [<eforrester@newbethanyministries.org>](mailto:eforrester@newbethanyministries.org); Teri Dakuginow ([tdakuginow@allentowndiocese.org](mailto:tdakuginow@allentowndiocese.org)); Tom Miller ([tmiller@allentowndiocese.org](mailto:tmiller@allentowndiocese.org)); Marianne Werling [MARIANNEWERLING@lehighcounty.org](mailto:MARIANNEWERLING@lehighcounty.org); Chris Feiertag [chris@lcha-vhdc.org](mailto:chris@lcha-vhdc.org); [Dennis.zehner@centerforvisionloss.org](mailto:Dennis.zehner@centerforvisionloss.org); [Christe.Konopitski@centerforvisionloss.org](mailto:Christe.Konopitski@centerforvisionloss.org); [jasonpeters@lehighcountyauthority.org](mailto:jasonpeters@lehighcountyauthority.org); [agrannummosley@lccc.edu](mailto:agrannummosley@lccc.edu)  
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[inquiry@parklandaresfp.org](mailto:inquiry@parklandaresfp.org)  
[ordani@lutheran@ptd.net](mailto:ordani@lutheran@ptd.net)  
[stpaulschurch@rcn.com](mailto:stpaulschurch@rcn.com)  
[bethel@bethelbfc.org](mailto:bethel@bethelbfc.org)  
[blorah@juno.com](mailto:blorah@juno.com)  
[saintste@ptd.net](mailto:saintste@ptd.net)  
[contact@christchurchatlowhill.org](mailto:contact@christchurchatlowhill.org)  
[info@lowhillfoodpantry.com](mailto:info@lowhillfoodpantry.com)  
[lowhillfoodpantry@gmail.com](mailto:lowhillfoodpantry@gmail.com)  
[ozuccoffice@ptd.net](mailto:ozuccoffice@ptd.net)  
[stpaulsucc@trexucc.org](mailto:stpaulsucc@trexucc.org)  
[WhitehallCoplayHunger@gmail.com](mailto:WhitehallCoplayHunger@gmail.com)  
[carmenromanfp@gmail.com](mailto:carmenromanfp@gmail.com)  
 Young & Young [young@macungielawyers.com](mailto:young@macungielawyers.com)

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# PUBLIC NEEDS HEARING #1

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Annual Action Plan  
2021

101

OMB Control No: 2506-0117 (exp. 09/30/2022)

Annual Action Plan  
2021

80



2021 CDBG Application  
Public Hearing 1A  
March 23, 2021 at 11:00 am

Four people, representing two prospective applicants (Coplay Borough and Whitehall Township), participated in the public hearing. No comments were offered.

**From:** [Cyndi King](#)  
**To:** [Lehigh County](#)  
**Subject:** FR: FreeConferenceCall Detail Report  
**Date:** Tuesday, March 23, 2021 11:25:28 AM  
**Attachments:** [image001.png](#)

**From:** FreeConferenceCall Services <[noreply@freeconferencecall.com](mailto:noreply@freeconferencecall.com)>  
**Sent:** Tuesday, March 23, 2021 11:17 AM  
**To:** Cyndi King <[CyndiKing@lehighcounty.org](mailto:CyndiKing@lehighcounty.org)>  
**Subject:** FreeConferenceCall Detail Report

County of Lehigh Warning: This is an external email. Please exercise caution.



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[Learn More](#)

[Learn More](#)

## Account Information

**Date:** March 23, 2021 10:57:48 AM  
**Dial-in number:** ☐ (425) 436-6348  
**Access code:** 289060  
**Account:** 9812113812

## Audio

Phone	Screen Share	Start Time	End Time	Duration
(610) 437-5525 - WHITEHALL TOWNS		10:57:48 AM	11:15:17 AM	18m
(610) 782-3000 - LEHIGH COUNTY C		10:59:42 AM	11:15:17 AM	16m
(484) 695-4878 - ROBERT HAMMOND		11:00:07 AM	11:16:58 AM	17m
+1 610 704 9213 - LLC VGG		11:00:23 AM	11:15:17 AM	15m
+1 610 216 5182 - RICHARD KERN		11:02:18 AM	11:15:17 AM	13m

**Number of attendees:** 5

**Toll minutes:** 79m

Note: All times in Eastern Time

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**FreeConferenceCall.com**

P.O. Box 41069 Long Beach, CA 90803

Tel: ☐ (844) 844-1322

Fax: (562) 433-5250

First Public Hearing for FY 2021 CDBG  
March 23, 2021 & March 24, 2021  
Agenda

CDBG Application

- Applications due April 15, 2021
- Submittal Methods
  - Upload application
  - Email to [cyndiking@lehighcounty.org](mailto:cyndiking@lehighcounty.org)
  - 1 original, 3 copies mailed (no hand delivery) – no binding – by 4 pm
- Project Selection
  - Does the project fit within an eligible category?
    - List of CDBG eligible activities
  - Does the “eligible” project meet a national objective?
    - Is the project fundable?
      - Does it benefit low-to-moderate income households and in what way?
        - Public services usually are limited clientele or LMI household
          - Limited clientele
            - Collect surveys and substantiate (at the end of the program) that at least 51% of the households were LMI.
          - LMI Household
            - Verify that every household is LMI prior to providing service
        - Public facility projects are usually fundable via census data
          - Where do the beneficiaries live? Will the project draw beneficiaries from areas outside the immediate block group/census tract/municipality?
        - Construction projects - contact LC by April 2<sup>nd</sup> to discuss fundability
      - Is the activity addressing blight?
- Annual Plan Process Guidelines
  - Scoring criteria used to determine award amounts
    - Ability to complete project between 1/1/21 and 8/31/22.
    - Consolidated Plan goals
    - Benefiting and LMI area and/or municipality
    - For construction projects – 10% hard cost match
- Questions about Application Forms?

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# PUBLIC NEEDS HEARING #2

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Annual Action Plan  
2021

102

OMB Control No: 2506-0117 (exp. 09/30/2022)

Annual Action Plan  
2021

84

OMB Control No: 2506-0117 (exp. 09/30/2021)

2021 CDBG Application

Public Hearing 1B

March 24, 2021 at 5:00 pm

No applicants were present on the phone call. Only Laurie Moyer, Lehigh County Grants & Housing Manager, participated. Public hearing ended at 5:10 pm due to lack of participation.

No comments were offered.

## Proof of Publication Notice in the *Morning Call*

Under Act No. 587, Approved May 16, 1929 and its amendments

Sold To:  
Lehigh County Community Development - CU00164605  
17 S 7th St  
Allentown, PA 18101-2401

Bill To:  
Lehigh County Community Development - CU00164605  
17 S 7th St  
Allentown, PA 18101-2401

STATE OF ILLINOIS            )  
COUNTY OF COOK            )     SS:

Jeremy Gates

of THE MORNING CALL, LLC, of the County of Lehigh and State of Pennsylvania, being duly sworn, deposes and says that THE MORNING CALL is a newspaper of general circulation as defined by the aforesaid Act, whose place of business is in the City of Allentown, County of Lehigh and State of Pennsylvania, and that the said newspaper was established in 1888 since which date THE MORNING CALL has regularly issued in said County, and that the printed notice or advertisement attached hereto is exactly the same as was printed and published in regular editions and issues of the said THE MORNING CALL on the following dates, viz:

Feb 10, 2021.

Affiant further deposes that he is the designated agent duly authorized by THE MORNING CALL, LLC., a corporation, publisher of said THE MORNING CALL, a newspaper of general circulation, to verify the foregoing statement under oath, and the affiant is not interested in the subject matter of the aforesaid notice or advertisement, and that all allegations in the foregoing statements as to time, place and character of publication are true.



Designated Agent, THE MORNING CALL, LLC.

Sworn to and subscribed before me on this 11 day of February, 2021.



Notary Public



Order # - 6879302

# Proof of Publication Notice in the *Morning Call*

## NOTICE OF FINDING OF NO SIGNIFICANT IMPACT AND NOTICE OF INTENT TO REQUEST RELEASE OF FUNDS

County of Lehigh Government Center  
Department of Community and Economic Development  
17 South 7<sup>th</sup> Street  
Allentown, PA 18101  
Phone: 610-871-1964

These notices shall satisfy two separate but related procedural requirements for activities to be undertaken by the County of Lehigh.

### REQUEST FOR RELEASE OF FUNDS

On February 18, 2021, or about at least one day after the end of the comment period, the County of Lehigh will submit a request to the HUD Region 3 Mid Atlantic Philadelphia Field Office for the release of Community Development Block Grant funds under Title I of the Housing and Community Development Act of 1974, Public Law 93-383, as amended, to undertake:

**Project known as:** Urgent Need Roof & HVAC Replacement Program

**Purpose:** CDBG funds will be utilized to replace urgently needed roofs and HVAC systems on owner-occupied properties located in low- to moderate-income areas.

**Estimated Funding:** \$183,085

**Project Location:** Exact address locations are to be determined but all properties will be located in Lehigh County but outside of Allentown and Bethlehem.

**Project known as:** Lehigh County DCED – County-wide Housing Rehabilitation (CWHR) Program-Owner-occupied Housing Rehabilitation and Program Delivery

**Purpose:** CDBG funds will be utilized to bring approximately 7 owner-occupied properties up to code. Program delivery will also be included.

**Estimated Funding:** \$150,000

**Project Location:** Exact address locations are to be determined but all properties will be located in Lehigh County but outside of Allentown and Bethlehem.

### FINDING OF NO SIGNIFICANT IMPACT

The County of Lehigh has determined that the projects will have no significant impact on the human environment. Therefore, an Environmental Impact Statement under the National Environmental Policy Act of 1969 (NEPA) is not required. Additional project information is contained in the Environmental Review Record (ERR) on file at the County of Lehigh Government Center's Department of Community and Economic Development located at 17 South 7<sup>th</sup> Street, Allentown, PA 18101 and may be examined or copied weekdays 8:00A.M to 4:00P.M.

### PUBLIC COMMENTS

Any individual, group, or agency may submit written comments on the ERR to the County of Lehigh Government Center's Department of Community and Economic Development located at 17 South 7<sup>th</sup> Street, Allentown, PA 18101 or [lauriemoyer@lehighcounty.org](mailto:lauriemoyer@lehighcounty.org). Comments can also be made by viewing the ERR at <https://www.hudexchange.info/programs/environmental-review/environmental-review-records/>. All comments received by **February 17, 2021** will be considered by the County of Lehigh prior to authorizing submission of a request for release of funds. Comments should specify which Notice they are addressing.

### ENVIRONMENTAL CERTIFICATION

The County of Lehigh certifies to HUD that the Certifying Officer, Phillips Armstrong, in his capacity as County Executive of the County of Lehigh consents to accept the jurisdiction of the Federal Courts if an action is brought to enforce responsibilities in relation to the environmental review process and that these responsibilities have been satisfied. HUD's approval of the certification satisfies its responsibilities under NEPA and related laws and authorities and allows the County of Lehigh to use Community Development Block Grant Program funds.

### OBJECTIONS TO RELEASE OF FUNDS

HUD will accept objections to its release of funds and the County of Lehigh's certification for a period of fifteen days following the anticipated submission date or its actual receipt of the request (whichever is later) only if they are on one of the following bases: (a) the certification was not executed by the Certifying Officer of the County of Lehigh; (b) the County of Lehigh has omitted a step or failed to make a decision or finding required by HUD regulations at 24 CFR part 58; (c) the grant recipient or other participants in the development process have committed funds, incurred costs or undertaken

## Proof of Publication Notice in the *Morning Call*

activities not authorized by 24 CFR Part 58 before approval of a release of funds by HUD; or (d) another Federal agency acting pursuant to 40 CFR Part 1504 has submitted a written finding that the project is unsatisfactory from the standpoint of environmental quality. Objections must be prepared and submitted in accordance with the required procedures (24 CFR Part 58, Sec. 58.76) and shall be addressed to the HUD Region 3 Mid Atlantic Philadelphia Field Office, Office of Community, Planning and Development at 100 Penn Square East, 12th Floor Philadelphia, PA 19107. Potential objectors should contact HUD to verify the actual last day of the objection period.

**Mr. Phillips Armstrong**  
**County Executive**  
Lehigh County Government Center  
17 South Seventh Street  
Allentown, PA 18101

Order # - 6879302



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## 2<sup>ND</sup> PUBLIC HEARING

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Annual Action Plan  
2021

110

OMB Control No: 2506-0117 (exp. 09/30/2022)

Annual Action Plan  
2021

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2021 CDBG APPLICATION

Public Service Projects



**COMMUNITY DEVELOPMENT BLOCK GRANT  
PROGRAM**

**Section 1:**

**Project Name:** \_\_\_\_\_

Name of Agency or Municipality: \_\_\_\_\_

Address of Project Site: \_\_\_\_\_

Type of agency: ☐ 501(c)(3) ☐ Gov't./Public ☐ For Profit ☐ Faith-Based ☐ Other

Federal Tax ID # (FEIN): \_\_\_\_\_

DUNS #: \_\_\_\_\_

SAM (System for Award Management) Renewal Date: \_\_\_\_\_

Chief Official's Name and Title: \_\_\_\_\_

Address 1: \_\_\_\_\_

Address 2: \_\_\_\_\_

Phone: \_\_\_\_\_

Email: \_\_\_\_\_

Contact Person's Name and Title: \_\_\_\_\_

Address 1: \_\_\_\_\_

Address 2: \_\_\_\_\_

Phone: \_\_\_\_\_

Email: \_\_\_\_\_

**Funding Request:**

Total CDBG funding requested (column B on budget form): \$ \_\_\_\_\_

Funds committed to project from other sources (column C on budget form): \$ \_\_\_\_\_

Total project cost (column E on budget form): \$ \_\_\_\_\_

Has this project previously received Lehigh County CDBG funds? ☐ Yes ☐ No Amount: \$ \_\_\_\_\_ OR

Is your agency applying for CDBG funding for the first time to support a public service? ☐ Yes ☐ No

Is your agency applying for CDBG funding for a new program or to afford a quantifiable increase in the program's service of at least 40%? ☐ Yes ☐ No (CDBG funding may not be used to replace other lost government funding).

**Project Summary:** Please provide a two-sentence description of the project.



## 2021 CDBG APPLICATION

### Public Service Projects



#### Section 2:

**Project Narrative:** Provide a detailed narrative describing the project in a separate, Word document. See Checklist of Required Documents for required components of the narrative.

**Eligibility Determination** - All projects must meet one national objective.

A. Under which national objective will your project qualify? *Choose only one:*

- ☐ Benefits residents with low or moderate incomes (LMI);
- ☐ Aids in the elimination of slums and blight; or
- ☐ Meets community needs having a particular urgency because conditions pose an immediate threat to public health or welfare (*Use only in consultation with Lehigh County*).

B. If qualifying your project under the LMI national objective, how will you determine benefit to low- and moderate-income residents? *Choose only one:*

- ☐ The project serves an entire census block group in which 39.01% or more of residents have low or moderate incomes. List census tract: \_\_\_\_\_ and block group: \_\_\_\_\_. Total population in this block group: \_\_\_\_\_  
Total low- to moderate-income population in this block group: \_\_\_\_\_  
Percent of population is low- to moderate-income: \_\_\_\_\_%
- ☐ The project serves multiple census block groups in which the average number of low- to moderate-income residents is 39.01% or more. Provide include the following information within the project narrative: applicable census block group(s), universe population for each block group, and LMI population for each block group.
- ☐ The project serves an area that is smaller than a census block group. We have conducted a survey of residents in order to demonstrate that 51% or more of residents have low or moderate incomes. (Please include survey as *Attachment A*).
- ☐ The project will serve a group of persons who are presumed eligible for assistance because they are in one of the following categories: seniors; severely disabled adults; homeless; battered spouses; abused/neglected children and youth; illiterate adults; migrant farm workers; persons with HIV/AIDS; and persons who use food banks or meals programs.
- ☐ The project will serve specific persons or households (i.e.: housing assistance). We will verify the incomes of individuals or households before approving their participation.



## 2021 CDBG APPLICATION

### Public Service Projects



#### Project Beneficiaries

Provide the number of people who will benefit from the project:

For infrastructure/construction projects, list *total number of individuals* who will benefit  
(number of residents in census tract/block group or specific neighborhood to be served) \_\_\_\_\_

For public service projects, list *total number of individuals* who will be served \_\_\_\_\_

For economic development projects, list *number of businesses* expected to be served \_\_\_\_\_  
and *number of jobs expected to be created/retained*, if applicable \_\_\_\_\_

Will the project primarily benefit residents described as:

- ☐ Extremely low incomes (30% of area median income [AMI] or less)  
☐ Very low incomes (50% of AMI or less)  
☐ Low/moderate incomes (80% of AMI or less)  
☐ Belonging to a Minority Group ☐ Senior Citizens  
☐ Persons with Disabilities ☐ Veterans  
☐ Other Underserved Constituency (describe): \_\_\_\_\_

Does your project affirmatively further fair housing choice (to take meaningful actions to overcome historic patterns of segregation, promote fair housing choice, and foster inclusive communities that are free from discrimination)?

☐ Yes ☐ No If yes, describe how:



## 2021 CDBG APPLICATION

### Public Service Projects



<b>Section 3: Agency Capacity</b>		
<b><i>Who will be the person responsible for the overall oversight of the proposed project?</i></b>		
Name:		
Title:		
Telephone Number:		Email Address:
<b><i>Who will be the alternate person responsible for the overall oversight of the proposed project?</i></b>		
Name:		
Title:		
Telephone Number:		Email Address:
<b><i>Who will be the person responsible for the day-to-day operations and management of the proposed project?</i></b>		
Name:		
Title:		
Telephone Number:		Email Address:
<b><i>Who will be the person responsible for the financial oversight of the CDBG expenditures and fiscal compliance?</i></b>		
Name:		
Title:		
Telephone Number:		Email Address:
<b><i>List the evaluation tools your agency plans to employ to track and monitor the progress of the project.</i></b>		
<p>Include fiscal oversight policies and agency capacity. Describe the agency's current operating budget, itemizing revenues and expenses. Identify commitments for ongoing funding. Identify any fund reserve, the purpose for the reserve and the reason for the level of the reserve. Address any findings found in previous year's audit and describe if those findings could impact the administration of the CDBG-funded project. Use additional sheets if necessary.</p>		







## 2021 CDBG APPLICATION

### Public Service Projects



#### EXHIBIT A - NON-PROFIT CERTIFICATION

I, \_\_\_\_\_, hereby certify that all parts of this application and all required attached documents are accurate to the best of my knowledge. I am also certifying that:

- The proposed project will not result in permanent involuntary displacement of any family, individual, business, non-profit organization or farm, or any of their personal property.
- If selected to receive Community Development Block Grant (CDBG) funding, the project will be operated in accordance with all applicable laws and regulations, including the CDBG Entitlement Grant Regulations at 24 CFR Part 570, Civil Rights Acts, the Fair Housing Act and the Americans with Disabilities Act.
- I am authorized by the municipality or organization identified within to submit this application. \*
- Reimbursement of Funds – The applicant agrees to reimburse the County of Lehigh for any expenditures paid to the applicant that are found to be ineligible under the CDBG program guidelines.
- Allocations – The applicant agrees that all projections of funds assume the continuation of the federal CDBG program and that the County is not responsible for costs incurred should the program be discontinued.

\_\_\_\_\_  
Name

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title







## 2021 CDBG APPLICATION

### Public Service Projects



### EXHIBIT B - FAIR HOUSING STATEMENT

By signing this page, you attest that your organization has agreed to adhere to the regulations set forth by the Fair Housing Act:

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and handicap (disability).

**Signature:**

\_\_\_\_\_  
**Organization Signature**

\_\_\_\_\_  
**Date**





## 2021 CDBG APPLICATION

### Public Service Projects



#### EXHIBIT C – Certification of Non-Delinquency to Lehigh County

By signing this page, you certify that your organization is not delinquent on taxes or other obligations owed to Lehigh County. According to Ordinance 2017-131 under Tax Delinquency:

Grants shall not be given to an organization that is delinquent on any taxes due the County until taxes are paid in full.

If an organization becomes delinquent on taxes owed the County during a year when said organization is budgeted to receive a grant, the County shall withhold grant funds in lieu of taxes until taxes are paid in full.

The County shall not give grants to an organization that is also a lessee of the County until the rent due the County is paid in full as provided for in the terms of the lease agreement.

**Signature:**

\_\_\_\_\_  
**Organization Signature**

\_\_\_\_\_  
**Date**





## 2021 CDBG APPLICATION

### Public Service Projects



### Checklist of Required Documents

All applicants must include:

1. ☐ Application cover sheet - Section 1
2. ☐ Project Narrative, Eligibility, and Beneficiaries – Section 2

The project narrative shall be provided in a separate Word document. The narrative shall describe the project, and address all of the following details:

- ☐ The need addressed by the project
- ☐ The benefit to low-income residents (how will the project improve the lives of low-income residents)
- ☐ A description of the project service area (you may also attach a map of the service area)
- ☐ The activities to be undertaken, including the scope of work and timeframe/implementation schedule
- ☐ The goals and objectives of the program, and how they will be monitored during the activity.
- ☐ Data to be collected in order to measure achievement of goals.
- ☐ **Five Year Consolidated Plan Goals:** which local priority does the project address?

3. ☐ Line Item Budget Form
4. ☐ Budget Narrative

Provide an explanation of how the estimated cost of each category listed on the budget form was calculated. Take into consideration recordkeeping responsibilities and other supportive services when creating the project budget. Address whether or not the matching dollars are secured at time of CDBG application submittal.

5. ☐ EXHIBIT A – Non-Profit Certification
6. ☐ EXHIBIT B – Fair Housing Statement
7. ☐ EXHIBIT C – Certification to Pay Taxes and Other Obligations to Lehigh County
8. ☐ A copy of all in-take documentation and procedures used to determine client income
9. ☐ Job descriptions of requested staff positions, if any. Identify eligible duties.

Submit the application via the portal on Lehigh County's website. Alternatively, applications can be emailed to [cyndiking@lehighcounty.org](mailto:cyndiking@lehighcounty.org). Hard copy applications shall not be submitted in lieu of uploaded or emailed applications.



## 2021 CDBG APPLICATION

### Public Service Projects



Additionally, **you must include ALL of the following as attachments.** These documents are required per Lehigh County's grant ordinance. Documents will be posted on Lehigh County's website soon after application submission and removed after ordinance approval:

1. ☐ The current and previous fiscal year's budget, including the actual revenues and expenditures for the previous year
2. ☐ Audited financial statements for the two (2) previous fiscal years
3. ☐ The positions of all employees, officers and board members who receive \$50,000.00 or more in annual compensation, including bonuses, from the requesting organization
4. ☐ The total compensation of the organization's five (5) highest compensated individuals
5. ☐ A list of all funding sources and the total amount received from each funding source for the previous year
6. ☐ A list of all funding sources for the current year, and a list of all pending applications for funding, including the amount requested

**If your organization is a first-time CDBG applicant,** the following documents are also required:

1. ☐ Certification of nonprofit status [Letter from IRS 501 (c)(3)]
2. ☐ Articles of Incorporation
3. ☐ By - Laws
4. ☐ Annual operating budget
5. ☐ Information on new program or quantifiable increase in need of existing program
6. ☐ Agency information including:
  - a brief history, description of mission/purpose, services provided
  - a description of the staff, volunteers, consultants, and/or board members who will be directly associated with this project and their responsibilities
  - a description of the overall program delivery strategy



COUNTY OF LEHIGH  
Office of Community Development

Laurie A. Moyer  
Grants & Housing  
Manager

February 15, 2021

Dear CDBG Applicant:

The County of Lehigh is once again anticipating the appropriation of funds from the U.S. Department of Housing and Urban Development (HUD) for the Community Development Block Grant (CDBG) program. The 2021 CDBG allocation is estimated to be \$1,288,293.

In anticipation of the 2021 CDBG allocation, the County of Lehigh is seeking applications from municipalities and non-profit organizations for projects benefiting Lehigh County residents living outside of the city limits of Allentown and Bethlehem. Enclosed you will find the grant application packet. This packet includes program requirements, as well as the application forms that must be submitted for each project. If you will not be responsible for completing the application, please forward it to the appropriate person within your organization.

Applications are being accepted for all projects as listed on the attached eligible CDBG activities list. Funding determinations will be made in accordance with Lehigh County's Annual Plan Process guidelines. Of particular interest, please be aware of scoring criteria for the following types of projects:

- Construction Projects
  - o Ability of the new project to be completed between January 1, 2021 and August 31, 2022 (reimbursement processed by September 16, 2022).
  - o Applicability to Lehigh County's Five-Year Consolidated Plan goals.
  - o Project location is in a low- to moderate-income (LMI) municipality. Municipalities designated as LMI are Catasauqua, Coplay, Hanover, Fountain Hill, Macungie, Slatington, and Whitehall.
  - o Hard match of 10% of request is dedicated by the applicant to completing project construction.
- Public Service Projects
  - o Projects funded via FY 2020 and asking for an increase in funding must provide data proving that there was at least a 40% quantifiable increase in the need for services over the past 12 months.
  - o Projects not funded via FY 2020: applications will be accepted for new or existing services. Applications for existing services must prove at least a 40% quantifiable increase in the need for the service over the past 12 months.
  - o On the CDBG application webpage, there are examples illustrating public services and quantifiable increase in need. Please reference this page, entitled "Quantifiable Increase for Public Services" for details on satisfying the documentation requirements.
  - o All projects must fit into Lehigh County's Five-Year Consolidated Plan goals and document the ability to be completed between October 1, 2021 and August 31, 2022.

Applications are available for download via the Department of Community & Economic Development's webpage on Lehigh County's website (<https://www.lehighcounty.org/Departments/Community-Economic-Development/CDBG-Grant-Application>). Two separate applications are available. Except for agencies submitting a public service project, all applicants should complete the 'Public Facility, Construction and Other Projects' application. The appropriate application can be downloaded, completed and saved on your computer as a fillable form. Applicants must save the application as a fillable pdf form and NOT a Word document or any format other than the original format. Applicants should also notice the other documents available for download from the webpage. Information within the documents will need to be referenced when completing the application. Once the application is complete, it can be uploaded to Lehigh

17 South Seventh Street  
Allentown, Pennsylvania 18101  
Phone: 610-782-3565  
Fax: 610-820-8257





COUNTY OF LEHIGH  
Office of Community Development

Laurie A. Moyer  
Grants & Housing  
Manager

County, inclusive of all required supplemental documentation. Again, the uploaded application must be in a fillable pdf format to be considered.

All CDBG-funded projects are subject to an environmental review, which must be completed by the County before funds may be committed. Issues requiring remediation would need to be completed prior to the start of any project. Therefore, knowledge of any possible issues should be disclosed at time of application.

All those requesting funds for a construction project:

- Suggested for applicant to attend at least one (1) public hearing in March;
- All municipalities must contact Lehigh County to discuss qualifying the project's low- to moderate-income eligibility by April 2<sup>nd</sup>;

The Lehigh County Department of Community & Economic Development will hold a public hearing with two, duplicate sessions on March 23, 2021 at 11:00 am and March 24, 2021 at 5:00pm. The **dial-in phone number for both sessions is: (425) 436-6348** and the **access code is: 289060** for both sessions. This public hearing will discuss the CDBG application process, provide information on project eligibility and fundability, and collect comments about the CDBG program from the public. The Lehigh County Department of Community & Economic Development will hold a second CDBG public hearing on July 28, 2021 at 2:00pm to announce awards and also collect comments about the CDBG program from the public prior to sending the FY 2021 Annual Plan to HUD. The **dial-in phone number is (425)436-6348** and the **access code is 289060**.

The application due date is April 15, 2021. Applications may be uploaded via the Lehigh County website or emailed to [cyndiking@lehighcounty.org](mailto:cyndiking@lehighcounty.org).

Applicants who choose to mail their submissions must include one original and three copies of the entire grant submittal. Please do not use binders (three-ring or plastic binding). Applications must arrive in the office no later than 4 p.m. on the due date.

It is important to make applicants aware that the submittal of a CDBG application triggers federal regulations for the project. The applicant should assume, for planning purposes, that from the time of submittal of the CDBG application, federal regulations will apply to the project (e.g. procurement, environmental clearances, federal prevailing wages, providing documentation, etc.) Furthermore, applicants are not able to commit any funding including funding other than CDBG, to the overall project until the applicant receives a Notice to Advance from Lehigh County. Committing funding to a project prior to receiving the Notice to Advance can jeopardize a CDBG award. Should the application ultimately not be funded with CDBG dollars, compliance with federal regulations will no longer apply to the project.

In the meantime, should you have questions or need technical assistance pertaining to the CDBG program, please do not hesitate to call me at (610) 782-3855. Thank you.

Laurie Moyer  
Grants & Housing Manager

17 South Seventh Street  
Allentown, Pennsylvania 18101  
Phone: 610-782-3565  
Fax: 610-820-8257



## 2021 CDBG APPLICATION

Public Facility, Construction and "Other" Projects



# COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

### Section 1:

#### Project Name:

Name of Agency or Municipality: \_\_\_\_\_

Address of Project Site: \_\_\_\_\_

Type of agency: ☐ 501(c)(3) ☐ Gov't./Public ☐ For Profit ☐ Faith-Based ☐ Other

Federal Tax ID # (FEIN): \_\_\_\_\_

DUNS #: \_\_\_\_\_

SAM (System for Award Management) Renewal Date: \_\_\_\_\_

Chief Official's Name and Title: \_\_\_\_\_

Address 1: \_\_\_\_\_

Address 2: \_\_\_\_\_

Phone: \_\_\_\_\_

Email: \_\_\_\_\_

Contact Person's Name and Title: \_\_\_\_\_

Address 1: \_\_\_\_\_

Address 2: \_\_\_\_\_

Phone: \_\_\_\_\_

Email: \_\_\_\_\_

#### Funding Request:

Total CDBG funding requested (column B on budget form): \$ \_\_\_\_\_

Funds committed to project from other sources (column C on budget form): \$ \_\_\_\_\_

Total project cost (column E on budget form): \$ \_\_\_\_\_

Has this project previously received Lehigh County CDBG funds? ☐ Yes ☐ No Amount: \$ \_\_\_\_\_ OR

Is your agency applying for CDBG funding for the first time to support a public service? ☐ Yes ☐ No

Is your agency applying for CDBG funding for a new program or to afford a quantifiable increase in the program's service of at least 40%? ☐ Yes ☐ No (CDBG funding may not be used to replace other lost government funding).

**Project Summary:** Please provide a two-sentence description of the project.



## 2021 CDBG APPLICATION

### Public Facility, Construction and "Other" Projects



#### Section 2:

**Project Narrative:** Provide a detailed narrative describing the project in a separate, Word document. See Checklist of Required Documents for required components of the narrative.

**Eligibility Determination** - All projects must meet one national objective.

A. Under which national objective will your project qualify? *Choose only one:*

- ☐ Benefits residents with low or moderate incomes (LMI);
- ☐ Aids in the elimination of slums and blight; or
- ☐ Meets community needs having a particular urgency because conditions pose an immediate threat to public health or welfare (*Use only in consultation with Lehigh County*).

B. If qualifying your project under the LMI national objective, how will you determine benefit to low- and moderate-income residents? *Choose only one:*

- ☐ The project serves an entire census block group in which 37.58% or more of residents have low or moderate incomes. List census tract: \_\_\_\_\_ and block group: \_\_\_\_\_. Total population in this block group: \_\_\_\_\_  
Total low- to moderate-income population in this block group: \_\_\_\_\_  
Percent of population is low- to moderate-income: \_\_\_\_\_%
- ☐ The project serves multiple census block groups in which the average number of low- to moderate-income residents is 37.58% or more. Provide include the following information within the project narrative: applicable census block group(s), universe population for each block group, and LMI population for each block group.
- ☐ The project serves an area that is smaller than a census block group. We have conducted a survey of residents in order to demonstrate that 51% or more of residents have low or moderate incomes. (Please include survey as *Attachment A*).
- ☐ The project will serve a group of persons who are presumed eligible for assistance because they are in one of the following categories: seniors; severely disabled adults; homeless; battered spouses; abused/neglected children and youth; illiterate adults; migrant farm workers; persons with HIV/AIDS; and persons who use food banks or meals programs.
- ☐ The project will serve specific persons or households (i.e.: housing assistance). We will verify the incomes of individuals or households before approving their participation.





## 2021 CDBG APPLICATION

### Public Facility, Construction and "Other" Projects



#### Project Beneficiaries

Provide the number of people who will benefit from the project:

For infrastructure/construction projects, list *total number of individuals* who will benefit (number of residents in census tract/block group or specific neighborhood to be served) \_\_\_\_\_

For public service projects, list *total number of individuals* who will be served \_\_\_\_\_

For economic development projects, list *number of businesses* expected to be served \_\_\_\_\_  
and *number of jobs expected to be created/retained*, if applicable \_\_\_\_\_

Will the project primarily benefit residents described as:

- |                                                                                          |                                          |
|------------------------------------------------------------------------------------------|------------------------------------------|
| <input type="checkbox"/> Extremely low incomes (30% of area median income [AMI] or less) |                                          |
| <input type="checkbox"/> Very low incomes (50% of AMI or less)                           |                                          |
| <input type="checkbox"/> Low/moderate incomes (80% of AMI or less)                       |                                          |
| <input type="checkbox"/> Belonging to a Minority Group                                   | <input type="checkbox"/> Senior Citizens |
| <input type="checkbox"/> Persons with Disabilities                                       | <input type="checkbox"/> Veterans        |
| <input type="checkbox"/> Other Underserved Constituency (describe): _____                |                                          |

Does your project affirmatively further fair housing choice (to take meaningful actions to overcome historic patterns of segregation, promote fair housing choice, and foster inclusive communities that are free from discrimination)? ☐ Yes ☐ No If yes, describe how:



## 2021 CDBG APPLICATION

### Public Facility, Construction and "Other" Projects



#### Section 3 FOR CONSTRUCTION PROJECTS ONLY:

Please provide photographs of project area.

If the project involves acquisition, rehabilitation, and/or demolition of a building, please provide photographs of the building and adjacent buildings/structures in a digital/electronic format. State the year the building was constructed:

\_\_\_\_\_

All CDBG-funded projects are subject to an environmental review, which must be completed by Lehigh County prior to funds being committed. Issues requiring remediation would need to be completed prior to the start of any project. Please check all that apply to the project:

- ☐ Project involves alteration, construction, or demolition of any building more than 50 years old.
- ☐ Project location is in a possible historic district.
- ☐ Project is close to highways or commercial enterprises storing hazardous materials.
- ☐ Endangered species have been identified in a nearby area.
- ☐ The project is in a 100- or 500-year floodplain.

**\*\*Submit a FEMA Firm Panel map with the project area clearly marked. This is a requirement regardless of whether or not the project is located within a flood plain.**

**\*\*Submit a census block group map with the project area and the service area clearly marked.**

**\*\*Submit a neighborhood map (Google or suitable alternative) illustrating the project footprint.**

Describe any potential environmental issues:

All construction projects above \$2,000 that are funded in whole or in part with CDBG funds are subject to Davis-Bacon Federal Wage Rates but may be subject to PA Prevailing Wage Rates. Three exceptions are not subject to federal wage rates: Projects that use force account (municipality's own or another municipality's workforce); demolition projects; and housing projects under a certain threshold. Projects not subject to David-Bacon Federal Wage Rates may be subject to State (PA) prevailing wage rates. *Choose one:*

- ☐ The project will go out to bid, subject to Davis-Bacon Federal Wage Rates.
- ☐ The project will be done by force account or involves demolition or housing rehabilitation.
- ☐ The project will not include construction.

List any permits that have been obtained or are anticipated to be needed for this project, including the status of current permit applications.



## 2021 CDBG APPLICATION

### Public Facility, Construction and "Other" Projects



#### Section 4: Grantee Capacity

**Who will be the person responsible for the overall oversight of the proposed project?**

Name:

Title:

Telephone Number:

Email Address:

**Who will be the alternate person responsible for the overall oversight of the proposed project?**

Name:

Title:

Telephone Number:

Email Address:

**Who will be the person responsible for the day-to-day operations and management of the proposed project?**

Name:

Title:

Telephone Number:

Email Address:

**Who will be the person responsible for the financial oversight of the CDBG expenditures and fiscal compliance?**

Name:

Title:

Telephone Number:

Email Address:

Include fiscal oversight policies and agency capacity. Provide a Board of Directors list or Board of Trustees/Elected officials with the application. Use additional sheets if necessary.





## 2021 CDBG APPLICATION

### Public Facility, Construction and "Other" Projects



#### EXHIBIT A - APPLICANT CERTIFICATION

I, \_\_\_\_\_, hereby certify that all parts of this application and all required attached documents are accurate to the best of my knowledge. I am also certifying that:

- The proposed project will not result in permanent involuntary displacement of any family, individual, business, non-profit organization or farm, or any of their personal property.
- If selected to receive Community Development Block Grant (CDBG) funding, the project will be operated in accordance with all applicable laws and regulations, including the CDBG Entitlement Grant Regulations at 24 CFR Part 570, Civil Rights Acts, the Fair Housing Act and the Americans with Disabilities Act.
- I am authorized by the municipality or organization identified within to submit this application. \*
- Reimbursement of Funds – The applicant agrees to reimburse the County of Lehigh for any expenditures paid to the applicant that are found to be ineligible under the CDBG program guidelines.
- Allocations – The applicant agrees that all projections of funds assume the continuation of the federal CDBG program and that the County is not responsible for costs incurred should the program be discontinued.

\_\_\_\_\_  
Name

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title





## 2021 CDBG APPLICATION

### Public Facility, Construction and "Other" Projects



#### EXHIBIT B - FAIR HOUSING STATEMENT

By signing this page, you attest that your organization has agreed to adhere to the regulations set forth by the Fair Housing Act:

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and handicap (disability).

**Signature:**

\_\_\_\_\_  
**Organization Signature**

\_\_\_\_\_  
**Date**







## 2021 CDBG APPLICATION

### Public Facility, Construction and "Other" Projects



#### EXHIBIT C – Certification of Non-Delinquency to Lehigh County

By signing this page, you certify that your organization is not delinquent on taxes or other obligations owed to Lehigh County. According to Ordinance 2017-131 under Tax Delinquency:

Grants shall not be given to an organization that is delinquent on any taxes due the County until taxes are paid in full.

If an organization becomes delinquent on taxes owed the County during a year when said organization is budgeted to receive a grant, the County shall withhold grant funds in lieu of taxes until taxes are paid in full.

The County shall not give grants to an organization that is also a lessee of the County until the rent due the County is paid in full as provided for in the terms of the lease agreement.

**Signature:**

\_\_\_\_\_  
**Organization Signature**

\_\_\_\_\_  
**Date**





## 2021 CDBG APPLICATION

### Public Facility, Construction and "Other" Projects



#### Checklist of Required Documents

All applicants must include:

1. ☐ Application cover sheet - Section 1
2. ☐ Project Narrative, Eligibility, and Beneficiaries – Section 2

The project narrative shall be provided in a separate Word document. The narrative shall describe the project, and address all of the following details:

- ☐ The need addressed by the project.
  - ☐ The benefit to low-income residents (how will the project improve the lives of low-income residents)
  - ☐ A description of the project service area.
  - ☐ The activities to be undertaken, including the scope of work and timeframe/implementation schedule. Attach pictures depicting the project area, and specific areas of need.
  - ☐ The goals and objectives of the program, and how they will be achieved
  - ☐ If the project is located within a historic area or impacts a historic site. If historic, attach pictures of the historic site and potential impact.
  - ☐ If the project addresses State or Federal mandates
  - ☐ **Five Year Consolidated Plan Goals:** which local priority does the project address?
3. ☐ Construction Detail – Section 3
  4. ☐ Grantee Capacity – Section 4
  5. ☐ Line Item Budget Form
  6. ☐ Budget Narrative

Provide an explanation of how the estimated cost of each category listed on the budget form was calculated. Take into consideration recordkeeping responsibilities and other supportive services when creating the project budget. Address whether or not the matching dollars are secured at time of CDBG application submittal.

7. ☐ EXHIBIT A – Applicant Certification
8. ☐ EXHIBIT B – Fair Housing Statement
9. ☐ EXHIBIT C – Certification to Pay Taxes and Other Obligations to Lehigh County

Submit the application via the portal on Lehigh County's website. Alternatively, applications can be emailed to [cyndiking@lehighcounty.org](mailto:cyndiking@lehighcounty.org). Hard copy applications shall not be submitted in lieu of uploaded or emailed applications.





## 2021 CDBG APPLICATION

### Public Facility, Construction and "Other" Projects



Additionally, you must include **ALL of the following as attachments**. These documents are required per Lehigh County's grant ordinance. Documents will be posted on Lehigh County's website soon after application submission and removed after ordinance approval:

1. ☐ The current and previous fiscal year's budget, including the actual revenues and expenditures for the previous year
2. ☐ Audited financial statements for the two (2) previous fiscal years
3. ☐ The positions of all employees, officers and board members who receive \$50,000.00 or more in annual compensation, including bonuses, from the requesting organization
4. ☐ The total compensation of the organization's five (5) highest compensated individuals
5. ☐ A list of all funding sources and the total amount received from each funding source for the previous year
6. ☐ A list of all funding sources for the current year, and a list of all pending applications for funding, including the amount requested

**If a non-profit, and are a first-time CDBG applicant,** the following documents are also required:

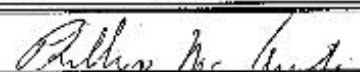
1. ☐ Certification of nonprofit status [Letter from IRS 501 (c)(3)]
2. ☐ Articles of Incorporation
3. ☐ By - Laws
4. ☐ Annual operating budget
5. ☐ Information on new program or quantifiable increase in need of existing program
6. ☐ Agency information including:
  - a brief history, description of mission/purpose, services provided
  - a description of the staff, volunteers, consultants, and/or board members who will be directly associated with this project and their responsibilities
  - a description of the overall program delivery strategy

# Grantee SF-424's and Certification(s)

OMB Number: 4840-0004  
Expiration Date: 12/31/2022

Application for Federal Assistance SF-424		
<div> <div> * 1. Type of Submission:  <input type="checkbox"/> Preapplication  <input type="checkbox"/> Application  <input checked="" type="checkbox"/> Changed/Corrected Application </div> <div> * 2. Type of Application:  <input type="checkbox"/> New  <input type="checkbox"/> Continuation  <input checked="" type="checkbox"/> Revision </div> <div> * 3. Revision, select appropriate letter(s):  <input type="checkbox"/> B: Decreases Awarded  <input type="checkbox"/> Other (Specify): </div> </div>		
* 5. Date Received: 12/17/2020		* 4. Applicant Identifier: 
5a. Federal Entity Identifier: 		5b. Federal Award Identifier: H-20-10-42-0011
State Use Only:		
6. Date Received by State: 		7. State Application Identifier: 
8. APPLICANT INFORMATION:		
* a. Legal Name: Lehigh County		
* b. Employer/Taxpayer Identification Number (E/TIN): 23-1563078		* c. Organizational DUNS: 0736100050000
d. Address:		
* Street1: Government Center		
* Street2: 17 South 7th Street		
* City: Allentown		
* County/Parish: Lehigh County		
* State: PA: Pennsylvania		
* Province:		
* Country: USA: UNITED STATES		
* Zip / Postal Code: 18101-2901		
e. Organizational Unit:		
Department Name: Community & Economic Development		Division Name: 
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Mr.		* First Name: Laurie
Middle Name:		
* Last Name: Moyer		
Suffix:		
Title: Grants & Housing Manager		
Organizational Affiliation:		
Department of Community & Economic Development		
* Telephone Number: 610-891-1964		* Fax Number:
* Email: lauriemoyer@lehighcounty.org		

Application for Federal Assistance SF-424	
<b>* 9. Type of Applicant 1: Select Applicant Type:</b> <input type="text" value="City/County Government"/>	
<b>Type of Applicant 2: Select Applicant Type:</b> <input type="text"/>	
<b>Type of Applicant 3: Select Applicant Type:</b> <input type="text"/>	
<b>* Other (specify):</b> <input type="text"/>	
<b>* 10. Name of Federal Agency:</b> <input type="text" value="U.S. Department of Housing &amp; Urban Development"/>	
<b>11. Catalog of Federal Domestic Assistance Number:</b> <input type="text" value="11.229"/>	
<b>CFDA Title:</b> <input type="text" value="Community Development Block Grant (CDBG)/Entitlement Grant"/>	
<b>* 12. Funding Opportunity Number:</b> <input type="text"/>	
<b>* Title:</b> <input type="text"/>	
<b>13. Competition Identification Number:</b> <input type="text"/>	
<b>Title:</b> <input type="text"/>	
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <div> <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachments"/> </div>	
<b>* 15. Descriptive Title of Applicant's Project:</b> <input type="text" value="Amendment to the FY 2020 Annual Action Plan for the CDBG program"/>	
Attach supporting documents as specified in agency instructions. <div> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> </div>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant	15
* b. Program/Project	15
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	
17. Proposed Project:	
* a. Start Date:	01/01/2020
* b. End Date:	06/30/2021
18. Estimated Funding (\$):	
* a. Federal	1,288,096.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	1,288,096.00
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process? <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> <input checked="" type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. <input type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes", provide explanation and attach <input type="text"/>	
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001) <input checked="" type="checkbox"/> ** I AGREE ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Prefix	Mr.
* First Name:	Phillips
Middle Name:	W.
* Last Name:	Stratton
Suffix	
* Title:	County Executive
* Telephone Number:	6157823361
Fax Number:	
* Email:	phillips@mcgillcounty.org
* Signature of Authorized Representative:	
* Date Signed:	12/17/2020

## CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

  
Signature of Authorized Official  
**Phillips M. Armstrong**  
County Executive  
Title  
1/21/21  
Date

### **Specific Community Development Block Grant Certifications**

The Entitlement Community certifies that:

**Citizen Participation** – It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** – Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Following a Plan** – It is following a current consolidated plan that has been approved by HUD.

**Use of Funds** – It has complied with the following criteria:

**1. Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

**2. Overall Benefit.** The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2018, 2019, 2020 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

**3. Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

**Compliance with Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2900d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

**Compliance with Laws** -- It will comply with applicable laws.

  
Signature of Authorized Official

1/21/21  
Date

**Phillips M. Armstrong**  
**County Executive**

Title

**OPTIONAL Community Development Block Grant Certification**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

  
Signature of Authorized Official

1/21/21  
Date

**Phillips M. Armstrong**  
County Executive  
Title



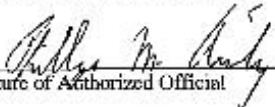
**Specific HOME Certifications**

The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

**Eligible Activities and Costs** -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Subsidy layering** -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

  
Signature of Authorized Official

1/21/21  
Date

**Phillips M. Armstrong**  
County Executive  
Title

## Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

**Major rehabilitation/conversion/renovation** – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long as the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

**Matching Funds** – The recipient will obtain matching amounts required under 24 CFR 576.201.

**Confidentiality** – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

**Discharge Policy** – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

  
Signature of Authorized Official

1/25/20  
Date

**Phillips M. Armstrong**  
County Executive

Title

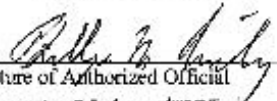
### **Housing Opportunities for Persons With AIDS Certifications**

The HOPWA grantee certifies that:

**Activities** -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

**Building** -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For a period of not less than 5 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

  
Signature of Authorized Official  
**Phillips M. Armstrong**  
County Executive  
Title

1/21/21  
Date

## **APPENDIX TO CERTIFICATIONS**

### **INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

#### **Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

### ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:


1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicap; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Control and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1973 (P.L. 93-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

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9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 16 U.S.C. §374), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§466a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1965 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4901 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE County Executive
APPLICANT ORGANIZATION County of Lehigh	DATE SUBMITTED 12/17/2021

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# ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4043-0009  
Expiration Date: 02/26/2022

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**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 18 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

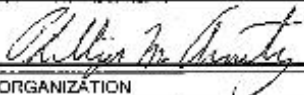
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Prescribed by OMB Circular A-102



11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §278c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 152(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11980; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
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17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1956, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	County Executive
APPLICANT ORGANIZATION	DATE SUBMITTED
Lehigh County	12/17/20

SF-424D (Rev. 7-97) Back