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# LEHIGH COUNTY, PENNSYLVANIA

DEPARTMENT OF COMMUNITY & ECONOMIC DEVELOPMENT

*17 South Seventh Street, Room 519, Allentown, PA 18101*

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## FY 2022 CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER)

*December 29, 2023*

*In Accordance with the HUD Guidelines for the  
Community Development Block Grant and HOME Investment  
Partnership Programs*

Frank Kane, Director  
Department of Community and  
Economic Development



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## CR-00 - Executive Summary

In accordance with the Federal regulations found in 24 CFR Part 570, Lehigh County, Pennsylvania has prepared this Consolidated Annual Performance and Evaluation Report (CAPER) for the period of October 1, 2022, to September 30, 2023. This is Lehigh County's 16<sup>th</sup> CDBG program year as a federal entitlement community. Lehigh County became a federal entitlement community receiving Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development (HUD) in 2007.

In FY 2022 Lehigh County was notified by HUD that it was eligible to become a HOME Entitlement Community. The County accepted the designation and the HOME funds. The County amended its FY 2019-2023 Five Year Consolidated Plan as a part of this process. This Five-Year Consolidated Plan was prepared for the program years FY 2019 through FY 2023, which set the priorities for the use of CDBG and HOME funding. The Five-Year Consolidated Plan allows a community to take a comprehensive approach to use resources granted to the community by HUD. Yearly, Lehigh County submits an Annual Action Plan containing the proposed activities outlining the use of CDBG and HOME funds for the upcoming program year. The Annual Action Plan relates the activities to goals and objectives outlined in the Five-Year Consolidated Plan. This Consolidated Annual Performance and Evaluation Report (CAPER) describes the accomplishments for the period of FY 2019-2023 Five Year Consolidated Plan. The CAPER describes the activities undertaken during this time period for funding from the U.S. Department of Housing and Urban Development (HUD) under the CDBG and HOME Programs. The projects/activities and accomplishments described in this CAPER principally benefit low- and moderate-income persons and the funding has been targeted to neighborhoods where there is the highest percentage of low- and moderate-income residents in Lehigh County.

The FY 2022 "draft CAPER" was made available for public review and comment for a 15-day period beginning Monday, December 4, 2023 and ending on Monday, December 18, 2023. The availability for review of the "draft CAPER" was advertised in the local newspaper and the CAPER was on display at the following locations in the County and on the County's website (<http://www.lehighcounty.org/Departments/Community-Economic-Development>):

- **Lehigh County Department of Community and Economic Development** - Lehigh County Government Center, 17 South 7<sup>th</sup> Street, Room 519, Allentown, PA 18101
- **Catasauqua Public Library** - 302 Bridge Street, Catasauqua, PA 18032
- **Coplay Library** - 49 South 5<sup>th</sup> Street, Coplay, PA 18037
- **Emmaus Public Library** - 11 East Main Street, Emmaus, PA 18049
- **Lower Macungie Library** - 3450 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

The following is the overall program narrative based on the Five-Year Consolidated Plan and FY 2022 Annual Action Plan.

#### Grants Received –

Lehigh County has received the following grant amounts during the time period of October 1, 2022 through September 30, 2023:

	CDBG	HOME	TOTALS
Entitlement Grants	\$ 1,229,243.00	\$ 569,699.00	\$ 1,798,942.00
Program Income	\$ 37,588.65	\$ 0.00	\$ 37,588.65
Local Match	\$ 0.00	\$ 180,301.00	\$ 180,301.00
<b>Total Funds Received:</b>	<b>\$ 1,266,831.65</b>	<b>\$ 750,000.00</b>	<b>\$ 2,016,831.65</b>

This chart above includes only grants received during October 1, 2022 through September 30, 2023. Any previous year's grants are not included.

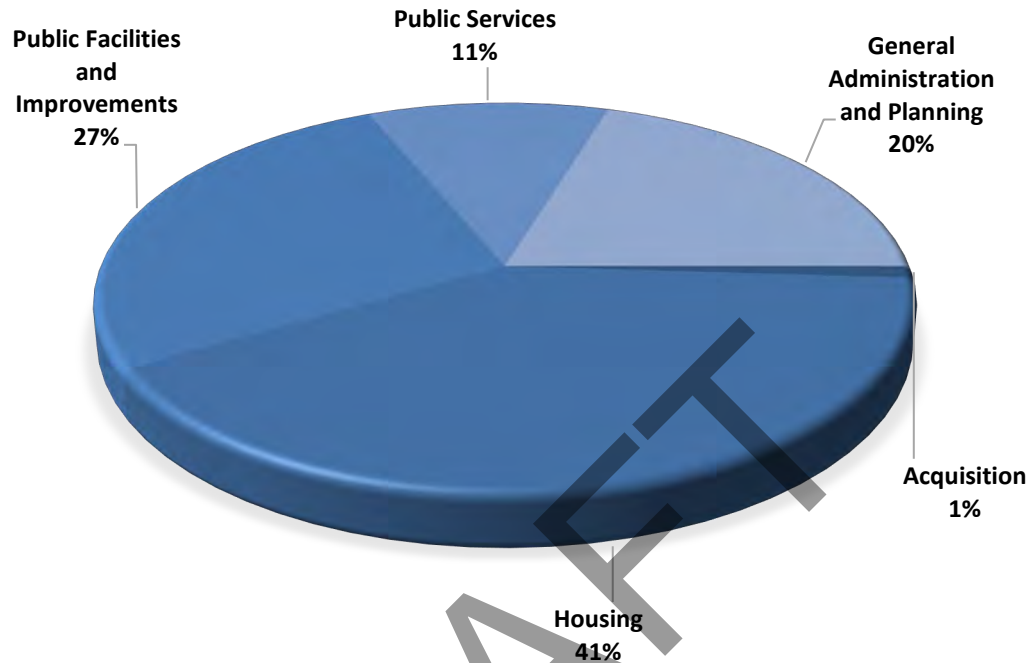
#### Funds Expended –

Amounts shown in the table below are funds that were expended during the time period October 1, 2022 through September 30, 2023. These expenditures consist of previous year's funds that were not used or expended as well as any reprogrammed funds from previous years.

Funding Sources	Total Funds Expended
Community Development Block Grant (CDBG)	\$ 1,159,023.71
HOME Investment Partnership (HOME)	\$ 0.00
<b>Total:</b>	<b>\$ 1,159,023.71</b>

The County's CDBG expenditures by type of activity are shown below.

### Expenditures by Type of Activity



Type of Activity	Expenditure	Percentage
Acquisition	\$ 11,240.92	0.97%
Economic Development	\$ 0.00	0.00%
Housing	\$ 471,670.02	40.70%
Public Facilities and Improvements	\$ 312,740.03	26.98%
Public Services	\$ 129,094.03	11.14%
General Administration and Planning	\$ 234,278.71	20.21%
<b>Total:</b>	<b>\$ 1,159,023.71</b>	<b>100.00%</b>

**\*Note:** The numbers in this chart are taken from the PR-54 - CDBG Community Development Block Grant Performance Profile downloaded from IDIS, which includes both Program Income and prior year CDBG funds expended during this CAPER period.

**CARES Act Supplemental Allocations Expended**

Amounts shown in the table below consist of FY 2020 CARES Act supplemental allocation funds that were expended during the reporting period of October 1, 2022 through September 30, 2023.

Funding Sources	Funds Expended in FY 2022	Total Funds Expended
Community Development Block Grant – Coronavirus (CDBG-CV)	\$ 438,941.64	\$ 1,126,285.56

Lehigh County expended \$438,941.64 during this CAPER period and to date has expended \$1,126,285.56 in CDBG-CV funds.

Lehigh County in total has expended CDBG-CV funds on the following types of activities:

Type of CDBG-CV Activity	Expenditure	Percentage
Public Services	\$ 1,062,104.59	94.30%
General Administration and Planning	\$ 64,180.97	5.70%
<b>Total:</b>	<b>\$ 1,126,285.56</b>	<b>100.00%</b>

The County has expended 52.43% of the CDBG-CV allocation to date. Of the CDBG-CV funds expended, 100% was disbursed to benefit LMI persons.

**Regulatory Caps and Set-Asides –**

Lehigh County's program administration expenditures were within the regulatory cap for the CDBG program. This is shown in the following table:

	CDBG
FY 2022 Entitlement Grants	\$ 1,229,243.00
FY 2022 Program Income	\$ 37,588.65
Administrative Cap Allowance	20%
Maximum Allowable Expenditures	\$ 252,366.33
Administrative Disbursed in IDIS	\$ 234,278.71
Total Administrative Obligations	\$ 234,278.71

<b>Administrative Percentage:</b>	<b>18.49%</b>
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Lehigh County's CDBG Program administrative obligation for this reporting period was \$234,278.71, which is below the 20% cap on administrative expenditures.

#### **CDBG Public Service Activity Cap –**

	<b>CDBG</b>
FY 2022 Entitlement Grants	\$ 1,229,243.00
Prior Year Program Income	\$ 0.00
Public Service Cap Allowance	15%
Maximum Allowable Expenditures	\$ 184,386.45
Total Public Services Funds Disbursed in IDIS	\$ 129,094.03
Total Public Services Obligations	\$ 117,371.61
<b>Public Service Percentage:</b>	<b>9.55%</b>

Lehigh County obligated \$117,371.61 in funds for public services, which was 9.55% of the allowable expenditures that include the FY 2022 Entitlement Grant. This was under the 15% cap on expenditures for public services.

#### **Five-Year Consolidated Plan Strategies and Goals:**

During the FY 2022 CAPER period, the County addressed the following priority need categories identified in its Five-Year Consolidated Plan:

#### **HOUSING STRATEGY - HSS**

**Goal:** Improve, preserve, and expand the supply of affordable housing for low- and moderate-income persons and families in Lehigh County.

#### **Objectives:**

- **HSS-1 Home Ownership** - Promote and assist in developing homeownership opportunities for low- and moderate-income persons & families.
- **HSS-2 Mixed Income Housing** - Promote and assist in the development of mixed income housing, both rental housing and housing for homebuyers.

- **HSS-3 Housing Rehabilitation** - Promote and assist in the preservation of existing owner and renter occupied housing stock in the County.
- **HSS-4 Housing Construction** - Promote and assist in the development of affordable housing, both rental and sales housing.
- **HSS-5 Revitalization** - Promote and assist in the stabilization of residential neighborhoods by removing slums and blight, assembling sites for new housing, rehabilitation of existing housing, and code enforcement.
- **HSS-6 Fair Housing** - Affirmatively further fair housing by promoting fair housing choice throughout Lehigh County.
- **HSS-7 Housing Support** - Promote and assist in housing counseling and support services to low- and moderate-income persons and families.

### HOMELESS STRATEGY - HOM

**Goal:** Improve the living conditions and services for homeless persons and families in Lehigh County.

**Objectives:**

- **HOM-1 Housing** - Promote and assist in developing housing opportunities for homeless persons, families, and those who are at-risk of becoming homeless.
- **HOM-2 Operations/Support** - Promote and assist in program support services for the homeless.
- **HOM-3 Homeless Prevention** - Promote and assist in anti-eviction and prevention of unfair housing practices, which may contribute to homelessness.

### SPECIAL NEEDS STRATEGY - SNS

**Goal:** Improve, preserve, and expand facilities for persons with special needs and the disabled in Lehigh County.

**Objectives:**

- **SNS-1 Housing** - Promote and assist to increase the supply of affordable, decent, safe, sound, and accessible housing for the elderly, persons with disabilities, and persons with other special needs through rehabilitation of existing housing and new construction of accessible housing.
- **SNS-2 Social Services** - Promote and assist to support social service programs and facilities for the elderly, persons with disabilities, and persons with other special needs.
- **SNS-3 Accessibility** - Promote and assist in making accessibility improvements to owner-occupied housing through rehabilitation and improve renter-occupied housing by making reasonable accommodations for the physically disabled.



**COMMUNITY DEVELOPMENT STRATEGY - CDS**

**Goal:** Improve, preserve, and create new public and community facilities, infrastructure, and public services to ensure the quality of life for all residents of Lehigh County.

**Objectives:**

- **CDS-1 Community Facilities** - Assist in improving parks, recreational centers, trails, libraries, and other public and community facilities throughout the County.
- **CDS-2 Infrastructure** - Assist in improving the public infrastructure through rehabilitation, reconstruction, and new construction.
- **CDS-3 Public Services** - Assist in improving and increasing public safety, municipal services, and public service and human service programs throughout Lehigh County.
- **CDS-4 Accessibility** - Assist in improving the physical and visual accessibility of community facilities, infrastructure, and public buildings throughout the County.
- **CDS-5 Public Safety** - Assist in improving the public safety facilities, equipment, and ability for first responders for emergency situations throughout the County.
- **CDS-6 Clearance** - Assist in removing and eliminating slums and blighting conditions through demolition of vacant, abandoned, unsafe and dilapidated structures throughout the County.
- **CDS-7 Public Transit** - Promote development of additional bus routes and improved public transportation for low- and moderate-income persons.

**ECONOMIC DEVELOPMENT STRATEGY - EDS**

**Goal:** Increase and promote job creation, job retention, self-sufficiency, education, job training, technical assistance, and economic empowerment of low- and moderate-income residents of Lehigh County.

**Objectives:**

- **EDS-1 Employment** - Support and encourage new job creation, job retention, employment, and job training services.
- **EDS-2 Financial Assistance** - Support business and commercial growth through expansion and new development with technical and financial assistance programs.
- **EDS-3 Revitalization** - Support and promote plans for new development and redevelopment to revitalize distressed areas of Lehigh County.
- **EDS-4 Financial Incentives** - Support and encourage new economic development through local, state and Federal tax incentives and programs.

**ADMINISTRATION, PLANNING, AND MANAGEMENT STRATEGY - APM**

**Goal:** Provide sound and professional planning, administration, oversight and management of Federal, state, and local funded programs.

**Objectives:**

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

**FY 2022 CDBG Budget –**

The following chart lists the FY 2022 CDBG activities that were funded.

Project ID Number	Project Title/Description	2022 CDBG Budget	2022 CDBG Expenditures	Comments
CD-22-01	<b>Aspire to Autonomy - Emergency Shelter</b> - CDBG funds will be used for operating costs such as salaries/payroll expenses including taxes for a one-year period beginning October 1, 2022 through September 30, 2023.	\$ 28,000.00	\$ 28,000.00	Completed.
CD-22-02	<b>Communities in Schools of Lehigh Valley - Career Supports at LCTI</b> - 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.	\$ 25,000.00	\$ 25,000.00	Completed.
CD-22-03	<b>Lehigh Valley Center for Independent Living - People Living in Accessible Community Environments (PLACE) Program</b> - CDBG funds will be used to provide 40 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. Multi-year activity.	\$ 25,000.00	\$ 11,866.06	The remaining funds will be expended during the FY 2023 CAPER period.
CD-22-04	<b>Manito Life Center – Therapeutic Riding for At-Risk Adolescents</b> - CDBG funds will be used for provision of once-a-week sessions for 10 weeks, to 30 adolescents having a history of stress, anxiety, eating disorders, suicidal tendencies, and a risk for violent behaviors. New pilot program	\$ 30,000.00	\$ 30,000.00	Completed.

	through Lehigh Valley Health Network (LVHN), Dr. Hatim Omar. Multi-year activity.			
CD-22-05	<b>Meals on Wheels – Shelf Stable Food Support</b> - CDBG funds will be used for home delivery of free, household supplies and shelf-stable food items to 25 seniors and/or disabled adults who lack the ability to access food pantries on a regular basis. Multi-year activity.	\$ 20,077.00	\$ 20,077.00	Completed.
CD-22-06	<b>The Literacy Center – Empowering Adults with Literacy</b> - CDBG funds will be used to prepare 30 Lehigh County adults to successfully pursue their professional and educational goals through literacy instruction. Multi-year activity.	\$ 15,000.00	\$ 5,681.88	The remaining funds will be expended during the FY 2023 CAPER period.
CD-22-07	<b>North Penn Legal Services -LMI Legal Help</b> - CDBG Funds will be used by North Penn Legal Services (NPLS) to provide 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. Multi-year activity.	\$ 12,000.00	\$ 12,000.00	Completed.
CD-22-08	<b>Catasauqua Borough – Fluoride Treatment System Improvements</b> - CDBG funds will be used by the Catasauqua Municipal Water Works to make upgrade improvements to the fluoride treatment system and to construct a small addition to the existing water treatment plant building supporting requisite secondary containment of hydrofluosilicic acid (fluoride) for the safety of the staff handling the chemical.	\$ 169,236.58	\$ 0.00	Cancelled.
CD-22-09	<b>Coplay Borough – ADA Door at Library</b> - FY 2022 CDBG funds will be used to replace the existing front doors of the Coplay Public Library with an automatic ADA accessible door.	\$21,195.00	\$ 0.00	The funds will be expended during the FY 2023 CAPER period.
CD-22-10	<b>Emmaus Borough – Curb Cuts</b> - CDBG funds will be provided to reconstruct 16 curb cuts at various locations in the Borough.	\$35,000.00	\$ 35,000.00	Completed.
CD-22-11	<b>Fountain Hill – Jeter Avenue Reconstruction</b> - CDBG funds will be used for the full street reconstruction of Jeter Avenue to include removing existing deteriorated paving and installing new subbase, base course, and wearing course;	\$ 257,100.00	\$ 0.00	The funds will be expended during the FY 2023 CAPER period.

	reconstruction/replacement of curb ramps, as required, to be ADA compliant; the replacement of concrete curb that is deteriorated; and, the replacement of sidewalk sections that are upheaved and/or cracked and in poor condition.			
CD-22-12	<b>Salisbury Township - Sanitary Sewer Rehabilitation</b> - CDBG funds will be used to perform sanitary sewer rehabilitation and repairs in an effort to comply with a DEP-required Corrective Action Plan to address system-wide infiltration and inflow (I/I) and sanitary sewer overflow (SSO) issues. The proposed work consists of Cured-in-Place-Pipe (CIPP) lining of existing below grade sewer lines to include approximately 4,551 linear feet of eight-inch VCP sanitary sewer main lines and 110 lateral line reinstatements to be repaired.	\$ 50,000.00	\$ 0.00	The funds will be expended during the FY 2023 CAPER period.
CD-22-13	<b>Slatington Borough #1 - East South Rehabilitation</b> - CDBG funds will be provided for the reconstruction of East South Street beginning at its intersection with Main Street, thence easterly toward 2nd Street and continuing approximately 520 feet past 2nd Street toward Fairview Avenue. This project proposes making improvements to the roadway, and a total of six (6) ADA ramps at the intersections of East South Street and 2nd Street and East South Street and Middle Alley as well as modifying a stormwater catch basin. These will improve travel and safety for the residents of Slatington as well as any who use the street for automobile traffic, pedestrian traffic, or bicycle traffic. The improvements will allow all types of pedestrians to cross East South Street and 2nd Street in a more efficient and safer manner. This project will entail resurfacing the road, installing ADA ramps, stormwater catch basin modifications, and pavement restoration.	\$95,718.50	\$0.00	The funds will be expended during the FY 2023 CAPER period.
CD-22-14	<b>Slatington Borough #2 - East South Rehabilitation</b> - CDBG funds will be provided for the reconstruction of East South Street beginning at its intersection with Main Street, thence easterly toward 2nd Street and continuing approximately 520 feet past 2nd Street toward Fairview Avenue. This project proposes making improvements to the roadway, and a total	\$ 96,867.92	\$ 0.00	The funds will be expended during the FY 2023 CAPER period.

	of six (6) ADA ramps at the intersections of East South Street and 2nd Street and East South Street and Middle Alley as well as modifying a stormwater catch basin. These will improve travel and safety for the residents of Slatington as well as any who uses the street for automobile traffic, pedestrian traffic, or bicycle traffic. The improvements will allow all types of pedestrians to cross East South Street and 2nd Street in a more efficient and safer manner. This project will entail resurfacing the road, installing ADA ramps, stormwater catch basin modifications, and pavement restoration.			
CD-22-15	<b>Whitehall Township - Curb Cuts</b> - CDBG funds will be provided to reconstruct 33 curb cuts at various locations in the Township.	\$ 115,200.00	\$ 90,388.50	The funds will be expended during the FY 2023 CAPER period.
CD-22-16	<b>Administration</b> - Funds for oversight, management, and administration of the CDBG Program.	\$ 222,278.71	\$ 222,278.71	Completed.

The County spent \$480,292.15, or 39.1% of its FY 2022 CDBG allocation.

#### FY 2022 HOME Budget –

The following chart lists the FY 2022 HOME activities that were funded.

Project ID Number	Project Title/Description	2022 HOME Budget	2022 HOME Expenditures	Comments
HOME-22-17	<b>HOME Administration</b> - Funds for oversight, management, and administration of the HOME Program.	\$ 75,000.00	\$ 0.00	The funds will be expended during the FY 2023 CAPER period.
HOME-22-18	<b>CHDO Set-Aside</b> - HOME funds will be used to assist a CHDO to increase the number of affordable housing units in the County for owners and renters by assisting with acquisition, soft costs, construction, and rehabilitation.	\$ 112,500.00	\$ 0.00	The funds will be expended during the FY 2023 CAPER period.
HOME-22-19	<b>Affordable Housing Project</b> - HOME funds will be used to assist in the development of affordable housing in the County for owners and renters by assisting with acquisition, soft costs, construction, and rehabilitation.	\$ 562,500.00	\$ 0.00	The funds will be expended during the FY 2023 CAPER period.

**Housing Performance Measurements –**

The table below lists the objectives and outcomes that the County accomplished through CDBG activities during this CAPER period:

Objectives	Outcomes						Total by Objective	
	Availability/ Accessibility		Affordability		Sustainability			
	Units	\$	Unit s	\$	Units	\$	Units	\$
Suitable Living	2	\$43,616.18	0	\$0.00	72	\$460,000.00	74	\$503,616.18
Decent Housing	0	\$0.00	0	\$0.00	0	\$0.00	0	\$0.00
Economic Opportunity	0	\$0.00	0	\$0.00	0	\$0.00	0	\$0.00
Total by Outcome:	2	\$43,616.18	0	\$0.00	0	\$460,000.00	74	\$503,616.18

## CR-05 - Goals and Outcomes

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

*This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.*

This is Lehigh County's fourth year of the Five-Year Consolidated Plan designed to address the housing and non-housing needs of County residents. This year's CAPER reports on the actions and achievements the County accomplished in Fiscal Year 2022.

The CAPER for the FY 2022 Annual Action Plan for Lehigh County encompasses the County's CDBG and HOME Programs and outlines which activities the County undertook during the program year beginning October 1, 2022, and ending September 30, 2023. The Lehigh County Department of Community and Economic Development is the lead entity and administrator for the CDBG and HOME funds.

The CDBG and HOME Programs and the activities outlined in this FY 2022 CAPER principally benefited low- and moderate-income persons and funding was targeted to communities where there is the highest percentage of low- and moderate-income residents.

Lehigh County, during this CAPER period, budgeted and expended CDBG and HOME funds on the following strategies:

- **Housing Strategy – HSS** – Budgeted \$687,000, expended \$12,000.00.
- **Homeless Strategy – HOM** – Budgeted \$53,000.00, expended \$39,899.06.
- **Special Needs Strategy – SNS** – Budgeted \$0.00, expended \$0.00.
- **Community Development Strategy – CDS** – Budgeted \$930,395.00, expended \$206,147.38.
- **Economic Development Strategy – EDS** – Budgeted \$0.00, expended \$0.00.
- **Administration, Planning, and Management Strategy – APM** – Budgeted \$233,848.00, expended \$222,278.71.

**Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)**

*Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.*

Goal	Category	Indicator	Unit of Measure	Expected Strategic Plan	Actual Strategic Plan	Percent Complete	Expected Program Year	Actual Program Year	Percent Complete
APM-1 Coordination	Non-Housing Community Development administrative management	Other	Other	6	5	83.3%	2	2	100.00%
APM-2 Planning	Non-Housing Community Development administrative management	Other	Other	5	4	80.00%			
CDS-1 Community Facilities	Non-Housing Community Development	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	20,265	9,776	48.24%			
CDS-1 Community Facilities	Non-Housing Community Development	Other	Other	1	2	200.00%			



<b>CDS-2 Infrastructure</b>	Non-Housing Community Development	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	15,260	7,920	51.90%	0	3,620	100.00%
<b>CDS-2 Infrastructure</b>	Non-Housing Community Development	Other	Other	5	0	0.00%	6	0	0.00%
<b>CDS-3 Public Services</b>	Non-Housing Community Development	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1,045	10,679	1,021.91%	105	7,513	7,155.24%
<b>CDS-3 Public Services</b>	Non-Housing Community Development	Homeless Person Overnight Shelter	Persons Assisted	0	33	100.00%	0	0	
<b>CDS-3 Public Services</b>	Non-Housing Community Development	Overnight/ Emergency Shelter/Transitional Housing Beds added	Beds	0	0		0	0	
<b>CDS-3 Public Services</b>	Non-Housing Community Development	Homelessness Prevention	Persons Assisted	0	121	100.00%	0	53	100.00%
<b>CDS-4 Accessibility</b>	Non-Housing Community Development	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	30,440	12,931	42.48%	0	3,460	100.00%

<b>CDS-4 Accessibility</b>	Non-Housing Community Development	Rental units rehabilitated	Household Housing Unit	0	43	100.00%	0	43	100.00%
<b>CDS-4 Accessibility</b>	Non-Housing Community Development	Homeowner Housing Rehabilitated	Household Housing Unit	0	0		0	0	
<b>CDS-4 Accessibility</b>	Non-Housing Community Development	Housing for Homeless added	Household Housing Unit	0	0		0	0	
<b>CDS-4 Accessibility</b>	Non-Housing Community Development	Housing for People with HIV/AIDS added	Household Housing Unit	0	0		0	0	
<b>CDS-4 Accessibility</b>	Non-Housing Community Development	Other	Other	10	0	0.00%	67	0	0.00%
<b>CDS-5 Public Safety</b>	Non-Housing Community Development	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				
<b>CDS-6 Clearance</b>	Non-Housing Community Development	Buildings Demolished	Buildings	0	0				
<b>CDS-7 Public Transit</b>	Non-Housing Community Development	Other	Other	0	0				
<b>EDS-1 Employment</b>	Economic Development	Jobs created/retained	Jobs	0	38	100.00%	0	38	100.00%

<b>EDS-1 Employment</b>	Economic Development	Businesses assisted	Businesses Assisted	0	0				
<b>EDS-2 Financial Assistance</b>	Economic Development	Businesses assisted	Businesses Assisted	0	0				
<b>EDS-3 Revitalization</b>	Non-Housing Community Development	Other	Other	0	0				
<b>EDS-4 Financial Incentives</b>	Economic Development	Other	Other	0	0				
<b>HOM-1 Housing</b>	Homeless	Public service activities for Low/Moderate Income Housing Benefit	Persons Assisted	0	6	100.00%	0	6	100.00%
<b>HOM-1 Housing</b>	Homeless	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	15	20	133.33%			
<b>HOM-1 Housing</b>	Homeless	Homeless Person Overnight Shelter	Persons Assisted	16	0	0.00%	16	0	0.00%
<b>HOM-1 Housing</b>	Homeless	Overnight/ Emergency Shelter/Transitional Housing Beds added	Beds	0	6	100.00%	0	6	100.00%
<b>HOM-2 Operation/Support</b>	Homeless	Overnight/ Emergency Shelter/Transitional Housing Beds added	Beds	0	0				

<b>HOM-3 Homeless Prevention</b>	Homeless	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	166	100.00%	0	72	100.00%
<b>HOM-3 Homeless Prevention</b>	Homeless	Homeless Person Overnight Shelter	Persons Assisted	0	0				
<b>HOM-3 Homeless Prevention</b>	Homeless	Homelessness Prevention	Persons Assisted	40	25	62.50%	40	0	0.00%
<b>HSS-1 Home Ownership</b>	Affordable Housing	Homeowner Housing Added	Household Housing Unit	0	0				
<b>HSS-2 Mixed Income Housing</b>	Affordable Housing	Homeowner Housing Added	Household Housing Unit	0	0				
<b>HSS-3 Housing Rehabilitation</b>	Affordable Housing	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	65	0	0.00%			
<b>HSS-3 Housing Rehabilitation</b>	Affordable Housing	Rental units rehabilitated	Household Housing Unit	0	59	100.00%	0	59	100.00%
<b>HSS-3 Housing Rehabilitation</b>	Affordable Housing	Homeowner Housing Rehabilitated	Household Housing Unit	15	31	206.67%	0	12	100.00%

<b>HSS-3 Housing Rehabilitation</b>	Affordable Housing	Housing for Homeless added	Household Housing Unit	0	0		0	0	
<b>HSS-3 Housing Rehabilitation</b>	Affordable Housing	Housing for People with HIV/AIDS added	Household Housing Unit	0	0		0	0	
<b>HSS-4 Housing Construction</b>	Affordable Housing	Rental units constructed	Household Housing Unit	2	2	100.00%	5	0	0.00%
<b>HSS-4 Housing Construction</b>	Affordable Housing	Homeowner Housing Added	Household Housing Unit	0	0				
<b>HSS-5 Revitalization</b>	Affordable Housing	Other	Other	0	0				
<b>HSS-6 Fair Housing</b>	Affordable Housing	Public service activities for Low/Moderate Income Housing Benefit	Persons Assisted	40	0	0.00%	40	0	0.00%
<b>HSS-6 Fair Housing</b>	Affordable Housing	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	200	223	111.50%			
<b>HSS-6 Fair Housing</b>	Affordable Housing	Other	Other	5	4	80.00%	1	1	100.00%

<b>HSS-7 Housing Support</b>	Affordable Housing	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0				
<b>SNS-1 Housing</b>	Non-Homeless Special Needs	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0				
<b>SNS-1 Housing</b>	Non-Homeless Special Needs	Rental units constructed	Household Housing Unit	0	0				
<b>SNS-1 Housing</b>	Non-Homeless Special Needs	Homeowner Housing Added	Household Housing Unit	0	0				
<b>SNS-2 Social Services</b>	Non-Homeless Special Needs	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0				
<b>SNS-2 Social Services</b>	Non-Homeless Special Needs	Rental units constructed	Household Housing Unit	0	0				
<b>SNS-2 Social Services</b>	Non-Homeless Special Needs	Homeowner Housing Added	Household Housing Unit	0	0				

<b>SNS-3 Accessibility</b>	Non-Homeless Special Needs	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0				
<b>SNS-3 Accessibility</b>	Non-Homeless Special Needs	Rental units rehabilitated	Household Housing Unit	0	0				
<b>SNS-3 Accessibility</b>	Non-Homeless Special Needs	Homeowner Housing Rehabilitated	Household Housing Unit	0	0				

Table 1 - Accomplishments – Program Year &amp; Strategic Plan to Date

**Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.**

During the FY 2022 CDBG and HOME Programs Year, Lehigh County addressed the following goals from the Five-Year Consolidated Plan:

#### **HOUSING STRATEGY - HSS**

**Goal:** Improve, preserve, and expand the supply of affordable housing for low- and moderate-income persons and families in Lehigh County.

**Objectives:**

- **HSS-4 Housing Construction** - Promote and assist in the development of affordable housing, both rental and sales housing.

*The goal was to construct 5 housing units for low- and moderate-income residents through this activity. The County did not meet this goal during this CAPER period. This project is still ongoing and will be completed during the FY 2023 CAPER period.*

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

*The County used CDBG funds to pay for fair housing activities carried out by North Penn Legal Services. The goal was to assist forty (40) low- and moderate-income households through this activity. The County did not meet this goal during this CAPER period. This project is still ongoing and will be completed during the FY 2023 CAPER period.*

#### **HOMELESS STRATEGY - HOM**

**Goal:** Improve the living conditions and services for homeless persons and families in Lehigh County.

**Objectives:**

- **HOM-1 Housing** - Promote and assist in developing housing opportunities for homeless persons, families, and those who are at-risk of becoming homeless.

*During this CAPER reporting period, the County proposed to assist sixteen (16) low and moderate-income households. The County did not meet this goal during this CAPER period. This project is still ongoing and will be completed during the FY 2023 CAPER period.*



- **HOM-3 Homeless Prevention** - Promote and assist in anti-eviction and prevention of unfair housing practices, which may contribute to homelessness.

*During this CAPER reporting period, the County exceed its goals by assisting seventy-two (72) persons with homelessness prevention activities.*

## **COMMUNITY DEVELOPMENT STRATEGY - CDS**

**Goal:** Improve, preserve, and create new public and community facilities, infrastructure, and public services to ensure the quality of life for all residents of Lehigh County.

### **Objectives:**

- **CDS-2 Infrastructure** - Assist in improving the public infrastructure through rehabilitation, reconstruction, and new construction.

*During this CAPER reporting period, the County met its goal by assisted 3,620 low- and moderate-income persons.*

- **CDS-3 Public Services** - Assist in improving and increasing public safety, municipal services, and public service and human service programs throughout Lehigh County.

*The County proposed to serve 105 persons during this CAPER reporting period. The County exceeded this goal by assisting 7,566 persons during this CAPER period.*

- **CDS-4 Accessibility** - Assist in improving the physical and visual accessibility of community facilities, infrastructure, and public buildings throughout the County.

*During this CAPER period, the County met its goal by assisting 3,503 persons.*

## **ADMINISTRATION, PLANNING, AND MANAGEMENT STRATEGY - APM**

**Goal:** Provide sound and professional planning, administration, oversight and management of Federal, state, and local funded programs.

**Objectives:**

- **APM-1 Coordination** - Continue to provide sound and professional planning, program management and oversight for the successful administration of Federal, state, and local funded programs.

*The County continued to use CDBG, HOME and CDBG-CV funds to pay for administrative and office expenses of the CDBG, HOME and CDBG-CV programs.*

- **APM-2 Planning** - Continue to develop and plan for special studies, environmental clearance, fair housing, and compliance with all Federal, state, and local laws and regulations.

*The County continued to use CDBG, HOME and CDBG-CV funds to pay for administrative and office expenses of the CDBG, HOME and CDBG-CV programs.*

During this CAPER period, the County assisted twelve (12) owner-occupied housing units through the County-wide Rehabilitation program. The County also rehabilitated fifty-nine (59) renter-occupied housing units.

**CR-10 - Racial and Ethnic composition of families assisted**

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

	CDBG	HOME
White	7,007	0
Black or African American	721	0
Asian	158	0
American Indian or Alaska Native	24	0
Native Hawaiian or Other Pacific Islander	4	0
<b>Total:</b>	<b>7,914</b>	<b>0</b>
Hispanic	1,101	0
Not Hispanic	6,813	0
<b>Total:</b>	<b>7,914</b>	<b>0</b>

**Table 2 – Table of assistance to racial and ethnic populations by source of funds**

**Narrative**

Lehigh County's programs benefitted 7,007 (88.53%) White families, 721 (9.11%) Black or African American families, 158 (1.99%) Asian families, 24 (0.03%) American Indian or Alaska Native families, and 4 (0.005%) Native Hawaiian or Other Pacific Islander. Also, 1,101 families (13.91%) were Hispanic, versus 6,813 families (86.08%) who were not Hispanic.

**CR-15 - Resources and Investments 91.520(a)****Identify the resources made available**

Source of Funds	Source	Expected Amount Available	Actual Amount Expended as of Program Year 2022
CDBG	Public - Federal	\$1,229,243.00	\$1,159,023.71
HOME	Public - Federal	\$ 750,000.00	\$ 0.00
CDBG-CV	Public - Federal	\$2,025,770.00	\$1,126,285.56

**Table 3 - Resources Made Available****Narrative**

Lehigh County received the following grant amounts during the time period of October 1, 2022 through September 30, 2023:

- FY 2022 CDBG Allocation \$1,229,243.00
- HOME Allocation \$ 569,699.00
- Local Match \$ 180,301.00
- CDBG Program Income \$ 0.00
- FY 2020 CDBG-CV Allocation \$2,025,770.00
- Total Funds Received \$4,005,013.00**

During this CAPER period, Lehigh County expended \$1,159,023.17 of CDBG funds. The County expended \$480,292.15 in CDBG funds from FY 2022. The County did not expend any HOME funds during the CAPER period.

In addition, Lehigh County expended \$438,941.64 of CDBG-CV funds during this CAPER period and to date has expended \$1,126,285.56 in CDBG-CV funds.

**Identify the geographic distribution and location of investments**

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
County Wide	100%	100%	The County funded 19 projects during this CAPER period in this Target Area with CDBG and HOME funds.

**Table 4 – Identify the geographic distribution and location of investments**

## Narrative

Rationale for funding activities were based on the eligibility of the activity, if it met a national objective, who were the beneficiaries of the activity, and evidence of the need in the community or by the agency/organization. The County also selected projects, activities, and programs that addressed the Five-Year Goals and Objectives from the Five-Year Consolidated Plan. Additional consideration was given based on the community's or the agency's/organization's past history of expenditure of the CDBG funds, the ability to leverage other funds for the activity, past performance outcomes, and whether the FY 2022 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 or agency/organization's ability to complete the project in a timely manner. Lehigh County allocated its FY 2022 CDBG funds to provide assistance with activities that met the underserved needs of the communities participating in the program. The projects that meet the HUD criteria for benefit to low- and moderate-income households were located in those census tracts or block groups that were defined as low/mod areas. In selecting projects, consideration was given to the communities with concentrations of racial or ethnic groups and disproportionate needs standards.

Lehigh County has allocated its FY 2022 CDBG and HOME 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.
- The housing activities for the first-time homebuyers and housing rehabilitation programs have an income eligibility criteria, therefore the income requirement restricts funds to low- and moderate-income households throughout the County.

Affordable housing was identified as the largest underserved need in Lehigh County in the Five Year Consolidated Plan. Lehigh County during this program year became an HUD entitlement community under the HOME program. The County used these additional funds to help assist with the need of affordable housing. The primary obstacle to meeting the underserved needs is the limited resources available to address the identified priorities in the County. Lehigh County continued to partner with other agencies when feasible, to leverage resources and maximize outcomes in housing, community, and economic development.

The HOME Funds were allocated to be used for administration and for housing projects/activities. These funds were targeted to low-income households and projects/ activities designed to provide affordable housing to low-income households. The disbursement is based on the needs of low- and moderate-income households, not geographic area.

## Leveraging

**Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.**

The following public (non-federal) and private financial resources were made available to Lehigh County and its agencies and organizations to address the needs identified in the FY 2022 Annual Action Plan:

- Lehigh County Housing Authority received \$530,670.00 in FY 2022 Capital Funds for renovations and improvements to public housing to support affordable housing in the County.

There is no match requirement for the CDBG Program. Lehigh County does not receive an entitlement under ESG programs, which does require a match.

Lehigh County is a member of the PA Eastern Continuum of Care Network - Lehigh Valley Regional Homeless Advisory Board (RHAB). The RHAB covers two (2) counties in the region. These counties are Lehigh and Northampton. The following agencies in Lehigh County received FY 2022 CoC funds for Permanent Supportive Housing (PSH), Supportive Services (SS), and Transitional Housing (TH):

- **The Salvation Army, a New York Corporation - Allentown Hospitality House Permanent Housing Program** - received \$184,502.00 for permanent supportive housing.
- **Lehigh County Conference of Churches - Outreach and Case Management for the Disabled, Chronically Homeless** - received \$71,545.00 for support services.
- **Lehigh County Conference of Churches - Pathways Permanent Supportive Housing Consolidation** - received \$1,071,356.00 for permanent supportive housing.
- **Lehigh County Conference of Churches - Pathways Permanent Supportive Housing Consolidation Expansion** - received \$26,014.00 for permanent supportive housing.
- **Lehigh County Conference of Churches – Pathways RRH** - received \$996,842.00 for permanent supportive housing.
- **Lehigh County Housing Authority - Shelter Plus Care** - received \$241,210 for permanent supportive housing.
- **Resources for Human Development, Inc. – Crossroads Family** - received \$298,304.00 for permanent supportive housing.
- **Resources for Human Development, Inc. – Crossroads Individual** - received \$403,316.00 for permanent supportive housing.
- **Resources for Human Development, Inc. - LV ACT Housing Supports** - received \$229,840.00 for permanent supportive housing.
- **Resources for Human Development, Inc. – Crossroads Housing Bonus Expansion** - received \$266,389.00 for permanent supportive housing.

- **Pennsylvania Coalition Against Domestic Violence – Northeast Regional DV RRH** – received \$1,386,805 for rapid rehousing
- **Valley Housing Development Corporation - SHP # 2 and # 3** - received \$403,265.00 for permanent supportive housing.
- **Valley Youth House Committee, Inc. - TH/RRH** - received \$535,694.00 for temporary and rapid re-housing.
- **Third Street Alliance for Women and Children - LV – RRH** - received \$387,700.00 for rapid re-housing.
- **Valley Youth House Committee, Inc. - Lehigh Valley RRH for Families** - received \$322,472.00 for rapid re-housing.
- **Northampton County Housing Authority - NCHA Shelter Plus Care** - received \$125,973.00 for permanent supportive housing.

Lehigh County did not have any publicly owned land or property within the jurisdiction that was funded with CDBG funds.

DRAFT

**CR-20 - Affordable Housing 91.520(b)**

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of homeless households to be provided affordable housing units	0	0
Number of non-homeless households to be provided affordable housing units	5	71
Number of special-needs households to be provided affordable housing units	0	0
<b>Total:</b>	<b>5</b>	<b>71</b>

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through rental assistance	0	0
Number of households supported through the production of new units	5	0
Number of households supported through the rehab of existing units	0	71
Number of households supported through the acquisition of existing units	0	0
<b>Total:</b>	<b>5</b>	<b>71</b>

Table 6 – Number of Households Supported

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

The County during this CAPER period assisted twelve (12) single family households and fifty-nine (59) multi-family households through rehabilitation of existing housing units.

**Discuss how these outcomes will impact future annual action plans.**

Lehigh County is working toward achieving its goal of providing decent, safe, sound, and affordable housing for its low- and moderate-income residents. The County is providing CDBG and HOME funds for self-sufficiency, owner-occupied, renter-occupied housing rehabilitation, and the development of new affordable housing unit to keep the housing stock decent, safe, sound, and affordable.



**Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.**

Number of Persons Served	CDBG Actual	HOME Actual
Extremely Low-income	47	0
Low-income	21	0
Moderate-income	3	0
<b>Total:</b>	<b>71</b>	<b>0</b>

**Table 7 – Number of Persons Served**

### **Narrative Information**

During this CAPER period, the County assisted twelve (12) owner-occupied housing units through the County-wide Rehabilitation program. The County also rehabilitated fifty-nine (59) renter-occupied housing units.

Based on the PR 23 IDIS Report, Lehigh County during this CAPER period used its CDBG funds to assist 71 households, of which 66.2% (47) were Extremely Low-Income, 29.6% (21) were Low-Income, and 4.2% (3) were Moderate-Income.

**CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)**

**Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through: Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The Eastern PA CoC serves a total of thirty-three (33) counties. The 33 counties are organized into five (5) geographically dispersed Regional Homeless Advisory Boards (RHABs). Lehigh County is part of the Lehigh Valley Regional Homeless Advisory Board (LV-RHAB). The region is made up of two (2) counties which include: Lehigh and Northampton Counties.

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 included 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 was 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 included the following:

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

The Continuum of Care completes an annual Point-In-Time Count Survey in 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 2023, the following numbers of homeless persons were reported in Lehigh County:

- **Unsheltered** - 58 individuals, 0 families with children, and 1 children only
- **Transitional Housing** - 43 individuals, 10 families with children, and 1 children only
- **Emergency Shelter** - 280 individuals, 54 families with children, and 4 children only

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 2023 Lehigh County Point In Time Count, there were 58 unsheltered persons, 43 persons in transitional shelters, and 381 in emergency shelters. There were 128 children under the age of 18, with 17 in a transitional shelter and 111 in an emergency shelter.

**Chronic Homeless:**

Lehigh County reported an increase of chronic homelessness between 2021 through 2022. In 2021, the County had 2 chronic homeless individuals and by 2023 this number increased to 19 individuals with a peak of 21 individuals in 2022.

**Risk Factors for Homelessness:**

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 corrections facility. The data points to the needs to identify which institutions within the 33-County 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.

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

The Eastern PA Continuum of Care continues to operate a Coordinated Entry program, which was piloted in the Lehigh Valley and expanded to all 33 counties of the CoC, to ensure that those at-risk of homelessness or experiencing homelessness are connected to appropriate resources and services. The system continues to ensure the management of access, assessment, prioritization, and referral to housing and services for any person experiencing or at imminent risk of homelessness throughout the region. A call center operated by PA 2-1-1 provides live voice intake and there are 17 access sites that provide face-to-face intake. Service providers are trained in housing first, the VI-SPDAT assessment, and other best practices to assist homeless persons in receiving proper services. The CoC continues to conduct mobile outreach for vulnerable populations and includes ESL translation services with its intake services, as well as access for those who are hearing impaired. Coordinated Entry processes also continue to provide information about service needs and identify gaps to help communities plan their assistance and resources.

Lehigh County Conference of Churches assisted the homeless individuals that used the emergency shelters during weather advisory to provide outreach and evaluate their needs. In addition, they continued to provide outreach throughout the year to the chronically homeless that live in communities in an attempt to evaluate their needs.

Youth homelessness continues to be a major problem in the Lehigh Valley area, particularly for individuals in the 18-24 age group. It is estimated that up to 20% of the homeless people in the area fall in this age

group. There is a need for a year-round shelter for this age group, as Valley Youth House does not serve youth over the age of 18. Focused outreach has been conducted by the CoC on this age group in partnership with Valley Youth House, and this population continues to be a priority for Lehigh County. The Bradbury-Sullivan LGBT Community Center partnered with the Regional Homeless Advisory Board to provide housing and services to youth experiencing homelessness, as well as toiletry supplies and other products to homeless and housing-insecure LGBT youth in the Lehigh Valley. Valley Youth House is continuing to provide quarterly youth trainings to focus on educating providers in the best practices for youth, including LGBT youth.

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

- 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)
- 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” (LOTH) and reviewed this data with the CoC Data Committee, which meets quarterly to review CoC Performance and identify needed interventions. HMIS is used to monitor and record returns to homelessness, which is monitored through the Data Subcommittee each quarter.

Severity of need is taken into consideration in prioritizing people experiencing homelessness. 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.

**Chronic Homeless:**

There were twenty-one (21) chronically homeless persons in Lehigh County at the time of the 2023 PITC, with fourteen (14) chronically homeless in emergency shelter, and five (5) unsheltered. To improve access to Chronic Homeless beds across the CoC in counties with an excess of Chronic Homeless prioritized beds, the strategy was to implement the recently adopted "Bed Turnover Policy" in which a bed will first be filled through the project's waiting list, then within the County, then CoC-wide.

**Veterans:**

At the time of the 2023 PITC, there were no unsheltered Veterans in Lehigh County but there were seven (7) sheltered homeless Veterans. The State's ESG program prioritizes funding for programs providing homeless services to Veterans, and there are seven (7) 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 County Office of Veterans Affairs coordinates the Task Force. The single SSVF providers serving Lehigh and Northampton counties, Catholic Charities, is the main resource for rapid re-housing and homelessness prevention. This organization has 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.

**VASH Vouchers:**

The Allentown Housing Authority administers the HUD-VASH program for the Lehigh Valley. This program was 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: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing,**

**health, social services, employment, education, or youth needs**

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 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.

**Discussion****FY 2022 CDBG Program:**

Lehigh County used its FY 2022 CDBG funds for the following projects to assist the homeless or at risk of becoming homeless:

- **Aspire to Autonomy - Emergency Shelter (CDBG - \$28,000)** - CDBG funds were used to assisted with operating costs for a start-up shelter for single, female victims of human trafficking. This program assisted 19 persons during this CAPER period.
- **Lehigh Valley Center for Independent Living - People Living in Accessible Community Environments (PLACE) Program (CDBG - \$25,000)** - CDBG funds were used to assist consumers with housing options and connect consumers to community services they need to achieve or maintain their independence. Staff also educated private landlords, property managers, and realtors on the benefits of renting to people with disabilities. During this CAPER period, 73 persons were assisted.

#### **FY 2022 CoC Allocation:**

The CoC allocated FY 2022 CoC funding to the following projects:

- **The Salvation Army, a New York Corporation - Allentown Hospitality House Permanent Housing Program** - received \$184,502.00 for permanent supportive housing.
- **Lehigh County Conference of Churches - Outreach and Case Management for the Disabled, Chronically Homeless** - received \$71,545.00 for support services.
- **Lehigh County Conference of Churches - Pathways Permanent Supportive Housing Consolidation** - received \$1,071,356.00 for permanent supportive housing.
- **Lehigh County Conference of Churches - Pathways Permanent Supportive Housing Consolidation Expansion** - received \$26,014.00 for permanent supportive housing.
- **Lehigh County Conference of Churches – Pathways RRH** - received \$996,842.00 for permanent supportive housing.
- **Lehigh County Housing Authority - Shelter Plus Care** - received \$241,210 for permanent supportive housing.
- **Resources for Human Development, Inc. – Crossroads Family** - received \$298,304.00 for permanent supportive housing.
- **Resources for Human Development, Inc. – Crossroads Individual** - received \$403,316.00 for permanent supportive housing.
- **Resources for Human Development, Inc. - LV ACT Housing Supports** - received \$229,840.00 for permanent supportive housing.
- **Resources for Human Development, Inc. – Crossroads Housing Bonus Expansion** - received \$266,389.00 for permanent supportive housing.
- **Pennsylvania Coalition Against Domestic Violence – Northeast Regional DV RRH** – received \$1,386,805 for rapid rehousing
- **Valley Housing Development Corporation - SHP # 2 and # 3** - received \$403,265.00 for permanent supportive housing.
- **Valley Youth House Committee, Inc. - TH/RRH** - received \$535,694.00 for temporary and rapid re-housing.
- **Third Street Alliance for Women and Children - LV – RRH** - received \$387,700.00 for rapid re-housing.

- **Valley Youth House Committee, Inc. - Lehigh Valley RRH for Families** - received \$322,472.00 for rapid re-housing.
- **Northampton County Housing Authority - NCHA Shelter Plus Care** - received \$125,973.00 for permanent supportive housing.

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

### **Actions taken to address the needs of public housing**

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, the Commonwealth of Pennsylvania, the County of Lehigh and/or any other entity providing funding for affordable housing programs. This was 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.

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 received \$650,457 under a HUD Capital Fund grant for FY 2023, \$566,648 in Public Housing Operating funds and \$11,299,229 in Section 8 Housing Choice Voucher assistance.

The FY 2022 approximate allocation was used for the following activities:

- Operations \$50,630.00
- Administration \$50,630.00
- Dwelling Structures \$429,410.00
- **Total: \$530,670.00**

The Lehigh County Housing Authority (LCHA) maintains 289 units of public housing. The family housing waiting lists and senior housing waiting lists are both open. 1,965 households are currently on the public housing waiting list, of which 1,048 are seniors and 917 are families. The family housing waiting lists and senior housing waiting lists are both open.

Lehigh County Housing Authority continues to have a position for multi-lingual staff to better communicate with all residents. LCHA continued to provide Fair Housing training for staff members. LCHA also continued to strive to reach out to residents and prospective residents with special needs, and other minority populations. The Housing Authority advertised and also informed agencies providing services to elderly and disabled residents of the waiting list status.

The Allentown Housing Authority administers the HUD-VASH program across the Lehigh Valley. That program is coordinated through the Wilkes-Barre VA Medical Center.

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

Lehigh County supported the Housing Authority's efforts to work with tenants of public housing and Section 8 Housing Choice Vouchers to achieve self-sufficiency. There were no joint projects planned for the 2022 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 and public housing tenants. 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 included education, specialized training, job readiness, job placement activities, and career advancement objectives. The goals for each participating family member were set out in an individual's Training and Service Plan. LCHA has a baseline of 1,672 Section 8 Housing Choice Vouchers, with 499 applications on the waiting list. The Lehigh County Housing Authority posts the Annual Action Plan in the lobbies of the buildings asking for review and comment from all residents.

**Actions taken to provide assistance to troubled PHAs**

The Lehigh County Housing Authority was not designated as "troubled" by HUD and was performing satisfactorily according to HUD guidelines and standards during this CAPER period. Therefore, no assistance was needed to improve operations of this Public Housing Authority.

**CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)**

**Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)**

The Lehigh Valley Planning Commission (LVPC) has written a municipal guidance document on Fair Housing. The document, which was released in December 2015, explains Fair Housing as it relates to municipal zoning and code enforcement and the responsibilities of the region's communities to provide for inclusive residential opportunities. As part of the work, the LVPC has updated a series of model municipal ordinances to affirmatively further fair housing compliance for the region's typical community and housing types. The region's development patterns range from urban, to suburban, to rural, thus necessitating a suite of model ordinances to address the region's fair housing needs. The package of model ordinances includes: mixed use development, conservation subdivision, cottage housing, traditional neighborhoods, street connectivity, density bonuses, and inclusionary zoning. The municipal guidance remains active on LVPC's website.

**Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)**

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 used 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 was a considerable lack of public and private financial resources 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 was also challenging. In the Lehigh Valley Housing Needs Assessment, the following findings were identified:

- There were 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 were 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 multifamily 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 less 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. Lehigh County reenergized its General Purpose Authority (GPA) financing vehicle to assist nonprofit developers in the planning of possible new developments.

The Lehigh Valley Planning Commission has developed various model zoning and land use controls to encourage affordable housing. The task remains to incorporate these into the local municipal ordinances.

Lehigh County receives Affordable Housing Trust Funds (AHTF). The fund provides support for affordable housing projects in the County.

#### **FY 2022 CDBG Program:**

During this CAPER period, Lehigh County funded the following projects with CDBG funds to meet underserved needs:

- **Aspire to Autonomy - Emergency Shelter:** \$28,000.00
- **Communities in Schools of the Lehigh Valley - Career Supports at LCTI:** \$25,000.00
- **Lehigh Valley Center for Independent Living - People Living in Accessible Community Environments (PLACE) Program:** \$25,000.00
- **North Penn Legal Services - LMI Legal Aide:** \$12,000.00
- **The Literacy Center – Empowering Adults with Literacy:** \$15,000.00

#### **Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)**

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 still typically contains lead-based paint to some degree. Lead hazards were addressed during housing rehabilitation efforts. All homes that receive rehabilitation assistance were tested for the presence of lead-based paint. When evidence was found, the paint surfaces were removed or the materials were 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 hazards and to perform work in a lead safe manner. Contractors must be trained and registered with EPA to do work in older homes that disturb painted surfaces. Local building code officers were 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 taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)**

Approximately 12.1% of Lehigh County's residents live in poverty, which is slightly more than the Commonwealth of Pennsylvania, where 11.8% of residents live in poverty. Female-headed households with children in the County are particularly affected by poverty, at 32.1%. This information is taken from the 2017-2021 American Community Survey Five-Year Estimates. The County's goal is to reduce the extent of poverty by actions the County can control and through work with other agencies/organizations.

Poverty was 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 could be a destabilizing element in communities.

In Lehigh County, the Community Action Committee of the Lehigh Valley (CACLV) was the official anti-poverty agency. CACLV provided 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 varied programs that empower low-income households by assisting them to develop the skills needed for independent living. Lehigh Valley Community Land Trust, a subsidiary of CACLV, assists LMI residents of Lehigh County to become homeowners.

Lehigh County provided CDBG funds to public service agencies to assist households below the poverty level with services and program support. The County worked with service providers to pursue resources and innovative partnerships to support the development of affordable housing, homelessness prevention, and emergency food and shelter.

During this CAPER period, Lehigh County funded the following projects:

- **Aspire to Autonomy - Emergency Shelter** - \$28,000
- **Communities in Schools in Eastern PA - Career Supports at LCTI** - \$25,000.00
- **Lehigh Valley Center for Independent Living - People Living in Accessible Community Environments (PLACE) Program** - \$25,000.00
- **North Penn Legal Services - LMI Legal Help** - \$12,000.00
- **The Literacy Center - Empowering Adults with Literacy** - \$15,000.00

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

- Lehigh County worked 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.

- Lehigh Valley Economic Development Corporation (LVEDC) was 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, PA CareerLink offered a multi-faceted approach to the job market.

### **Actions taken to develop institutional structure. 91.220(k); 91.320(j)**

The primary responsibility for the administration of the Annual Action Plan was assigned to the Lehigh County Department of Community and Economic Development. This agency coordinated activities among local municipal governments, public entities, and private organizations, in their efforts to implement different strategies 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 extensive public/private partnerships aimed at revitalization in the County. In 2022, the partnerships included the following agencies:

- North Penn Legal Services
- Aspire to Autonomy
- Lehigh Valley Center for Independent Living (LVCIL)
- Lehigh Valley Regional Homeless Advisory Board (PA Eastern CoC)
- Lehigh Career and Technical Institute
- Meals on Wheels of the Greater Lehigh Valley
- Manito Life Center
- The Literacy Center
- Communities in Schools of the Lehigh Valley

Lehigh County consulted with business and civic leaders during its planning process for the preparation of its Annual Action Plan and Consolidated Plan. This included, but is not limited to, the following:

- The Greater Lehigh Valley Chamber of Commerce
- Community Action Committee of the Lehigh Valley (CACLV)
- 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. CGP&H during this CAPER period was working with the County to ensure that the housing rehabilitation program provides assistance to lower income

homeowners.

Lehigh County was 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 required regional support. Lehigh County has been supportive of this initiative.

The Lehigh Valley Planning Commission continued to be the entity responsible for performing project oversight required under Executive Order 12372. HUD has acknowledged that the State 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 was carried out by the Lehigh Valley Planning Commission during this CAPER period.

**Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)**

The primary responsibility for the administration of the Annual Action Plan was assigned to Lehigh County Department of Community and Economic Development. This agency coordinated activities among local municipalities, public, and private organizations, in their efforts to implement different strategies to realize the prioritized goals of the Annual Action Plan. The County was committed to continuing its participation and coordination with public, housing, and social service organizations. The County solicited 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 a CDBG application or which have expressed an interest in submitting a CDBG application. The applications were reviewed by the Department of Community and Economic Development staff and they addressed all questions with the applicants.

Lehigh County continued efforts to enhance coordination between agencies by creating partnerships such as in the implementation of the Section 3 and MBE-WBE outreach initiatives. The Section 3 outreach effort partnered with the Pennsylvania CareerLink, the Lehigh County Housing Authority and LCTI to identify Section 3 residents and businesses and to provide feedback on available job opportunities.

**Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)**

In February 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: Lack of Affordable Housing** - There is a lack of affordable housing in Lehigh County due to the influx in the number of unskilled and semi-skilled workers who have moved into the County, which has created a high demand and a corresponding increase in the cost of rental and

sales housing.

- **Impediment 2: Lack of Accessible Housing** - There is a lack of accessible housing in Lehigh County since the supply of accessible housing has not kept pace with the demand caused by the increase in the percentage of elderly persons in Lehigh County and more disabled persons desiring to live independently.
- **Impediment 3: Barriers Limiting Housing Choice** - There are physical, economic, and social barriers in Lehigh County which limit housing choices and housing opportunities for low-income households, minorities, and the disabled members of the County's population.
- **Impediment 4: Lack of Housing Awareness** - There is a lack of knowledge and understanding concerning the rights of individuals, families, and members of the protected classes in regard to the Fair Housing Act (FHA) and awareness of discriminatory practices.
- **Impediment 5: Lack of Economic Opportunities** - There is a lack of economic opportunities in the County for lower-income households to increase their income and thus improve their choices of housing.

Additional actions taken by Lehigh County to affirmatively further fair housing is included in section CR-65 Fair Housing.

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**CR-40 - Monitoring 91.220 and 91.230**

**Description of the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

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

The DCED staff regularly monitored the progress of every activity to ensure timeliness. Municipal projects and sub-recipients were held to a performance schedule through contract obligations. When these milestones were 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 were designed to ensure that:

- Objectives of the National Affordable Housing Act were met,
- Program activities were progressing in compliance with the specifications and schedule for each program, and
- Recipients were 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 were closely monitored and were included in the 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 occurred via desk monitoring remotely.

All sub-recipients identified the personnel working on the project, kept accurate records and filing systems to document program benefits and compliance, maintained an appropriate financial management system and submitted an audit.

There were 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 was 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).

**Citizen Participation Plan 91.105(d); 91.115(d)****Description of the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.**

Lehigh County placed the FY 2022 CAPER document on public display for a period of 15 days beginning on Monday, December 4, 2023 through Monday, December 18, 2023. A copy of the Public Notice was published in “The Morning Call” on Friday, December 1, 2023, a copy of which is attached in the Citizen Participation Section of this CAPER document.

The “Draft” FY 2022 CAPER was on display at the following locations in Lehigh County:

- **Lehigh County Department of Community and Economic Development** – Lehigh County Government Center, 17 South 7th Street, Allentown, PA 18101
- **Allentown Public Library** – 1210 West Hamilton Street, Allentown, PA 18102
- **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** – 3450 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
- **Lehigh County website** – [www.lehighcounty.org/Departments/Community-Economic-Development](http://www.lehighcounty.org/Departments/Community-Economic-Development)

**CR-45 - CDBG 91.520(c)**

**Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.**

Lehigh County has not made any changes to the Consolidated Plan and its CDBG program objectives during this reporting period.

**Describe accomplishments and program outcomes during the last year.**

During this CAPER period, Lehigh County expended CDBG funds on the following activities:

- **Acquisition** - \$11,240.92, which was 0.97% of the total expenditure.
- **Housing** - \$471,670.02, which was 40.70% of the total expenditure.
- **Public Facilities and Improvements** - \$312,740.03, which was 26.98% of the total expenditure.
- **Public Services** - \$129,094.03, which was 11.14% of the total expenditure.
- **General Administration and Planning** - \$234,278.71, which was 20.21% of the total expenditure.
- **Total = \$1,159,023.71**

The Lehigh County Timeliness Ratio of unexpended funds as a percentage of the FY 2022 CDBG allocation was 1.43, which was over the maximum 1.5 drawdown ratio.

During this CAPER period, the CDBG program targeted the following with its funds:

- **Percentage of Expenditures Assisting Low- and Moderate-Income Persons and Households Either Directly or On an Area Basis = 88.29%**
- **Percentage of Expenditures that Benefit Low- and Moderate-Income Areas = 10.28%**
- **Percentage of Expenditures that Aid in the Prevention or Elimination of Slum or Blight = 11.74%**

During this CAPER period, the income level beneficiaries data were the following:

- **Extremely Low Income (<=30%) = 5.14%**
- **Low Income (30-50%) = 93.63%**
- **Moderate Income (50-80%) = 0.95%**
- **Total Low and Moderate Income (<=80%) = 99.71%**
- **Non Low and Moderate Income (>80%) = 0.29%**

During this CAPER period, the County had the following CDBG accomplishments:

- **Actual Jobs Created or Retained – 0**
- **Households Receiving Housing Assistance – 72**
- **Persons Assisted Directly, Primarily by Public Services and Public Facilities – 3,726**
- **Persons for Whom Services and Facilities were Available – 1,810**
- **Units Rehabilitated - Single Units – 13**

- **Units Rehabilitated - Multi Units Housing – 59**

During this CAPER period, the County leveraged \$183,663.75 for CDBG Activities based on the PR54 CDBG Community Development Block Grant Performance Profile Report.

During this CAPER period, all of the CDBG funds were used to meet a National Objective. The County did not make any lump sum agreements during this CAPER period. The County did not have any float-funded activities during this FY 2022 CAPER period. Lehigh County did not have any disallowed expenditures, nor did the County return any funds to the line-of-credit.

Lehigh County did not acquire, demolish, and/or rehabilitate any County-owned properties using CDBG funds during this CAPER period.

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

No.

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**CR-50 – HOME 91.520(d)**

**Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations**

*Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.*

This is the first year that Lehigh County received HOME funds as a HOME Entitlement Community. No rental housing projects have been funded or developed at this time. Not Applicable.

**Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)**

Lehigh County continues to follow its Affirmative Marketing Policies and Procedures. The Affirmative Marketing Policy is in all of the HOME Subrecipient Agreements and is applicable to projects that contained five (5) or more units. The County during this CAPER period did not have any developments that had 5 or more units. Lehigh County provided all HOME funded projects and all subrecipients with the Affirmative Marketing Policy. The marketing of units is the responsibility of the housing provider to undertake in accordance with the Affirmative Marketing Policy.

**Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics**

During this CAPER period, the County did not receive any HOME Program Income, since this is the first year the County received HOME funds. Not Applicable.

**Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)**

Lehigh County helped to foster and maintain the quality of affordable housing through:

**HSS-1 Home Ownership** - Promote and assist in developing homeownership opportunities for low- and moderate-income persons & families.

- **Affordable Housing Project** - HOME funds were allocated to be used to assist in the development of affordable housing in the County for owners and renters by assisting with acquisition, soft costs, construction, and rehabilitation.

**HSS-2 Mixed Income Housing** - Promote and assist in the development of mixed income housing, both rental housing and housing for homebuyers.

- **CHDO Set-Aside** - HOME funds were allocated to be used to assist a CHDO to increase the number of affordable housing units in the County for owners and renters by assisting with acquisition, soft costs, construction, and rehabilitation.
- **Affordable Housing Project** - HOME funds were allocated to be used to assist in the development of affordable housing in the County for owners and renters by assisting with acquisition, soft costs, construction, and rehabilitation.

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

- **CHDO Set-Aside** - HOME funds were allocated to be used to assist a CHDO to increase the number of affordable housing units in the County for owners and renters by assisting with acquisition, soft costs, construction, and rehabilitation.
- **Affordable Housing Project** - HOME funds were allocated to be used to assist in the development of affordable housing in the County for owners and renters by assisting with acquisition, soft costs, construction, and rehabilitation.

**HSS-4 Housing Construction** - Promote and assist in the development of affordable housing, both rental and sales housing.

- **CHDO Set-Aside** - HOME funds were allocated to be used to assist a CHDO to increase the number of affordable housing units in the County for owners and renters by assisting with acquisition, soft costs, construction, and rehabilitation.
- **Affordable Housing Project** - HOME funds were allocated to be used to assist in the development of affordable housing in the County for owners and renters by assisting with acquisition, soft costs, construction, and rehabilitation.

The County provided CDBG and HOME funds that were used to develop or rehabilitate affordable housing in the County. The results were of from the activities funded in FY 2022 included:

- **Production of new rental-occupied units** - 0 units
- **Production of new Single Family occupied units** - 0 units
- **Single Family Housing Rehabilitation** - 12 households
- **Multi-family Housing Rehabilitation** - 59 households

**CR-58 - Section 3 Report**

<b>Total Labor Hours</b>	<b>CDBG</b>	<b>HOME</b>
Total Number of Activities	0	0
Total Labor Hours	0	0
Total Section 3 Worker Hours	0	0
Total Targeted Section 3 Worker Hours	0	0

**Table 15 – Total Labor Hours**

<b>Qualitative Efforts - Number of Activities by Program</b>	<b>CDBG</b>	<b>HOME</b>
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	0	0
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	0	0
Direct, on-the job training (including apprenticeships).	0	0
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	0	0
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	0	0
Outreach efforts to identify and secure bids from Section 3 business concerns.	0	0
Technical assistance to help Section 3 business concerns understand and bid on contracts.	0	0
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	0	0
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	0	0
Held one or more job fairs.	0	0
Provided or connected residents with supportive services that can provide direct services or referrals.	0	0
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.	0	0
Assisted residents with finding child care.	0	0
Assisted residents to apply for, or attend community college or a four year educational institution.	0	0
Assisted residents to apply for, or attend vocational/technical training.	0	0
Assisted residents to obtain financial literacy training and/or coaching.	0	0
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	0	0
Provided or connected residents with training on computer use or online technologies.	0	0
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	0	0
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0	0
Other.	0	0

**Table 16 – Qualitative Efforts - Number of Activities by Program**

**Narrative:**

Lehigh County required contractors to fill out a Section 3 Contract Solicitation and Commitment Statement as a part of their bid. The County advertised its construction bid with the Section 3 Requirements.

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**CR-60 – IDIS Reports**

Attached are the following U.S. Department of Housing and Urban Development (HUD) Reports from IDIS for the period from October 1, 2022, through September 30, 2023.

Attached are the following IDIS reports:

- IDIS Report PR26 – CDBG Financial Summary
- IDIS Report PR26 – CDBG-CV Financial Summary
- IDIS Report PR06 – Summary of Consolidated Plans

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Office of Community Planning and Development  
U.S. Department of Housing and Urban Development  
Integrated Disbursement and Information System  
PR26 - CDBG Financial Summary Report  
Program Year 2022  
LEHIGH COUNTY , PA

DATE: 11-29-23  
TIME: 14:09  
PAGE: 1

PART I: SUMMARY OF CDBG RESOURCES

01 UNEXPENDED CDBG FUNDS AT END OF PREVIOUS PROGRAM YEAR	2,081,171.55
02 ENTITLEMENT GRANT	1,229,243.00
03 SURPLUS URBAN RENEWAL	0.00
04 SECTION 108 GUARANTEED LOAN FUNDS	0.00
05 CURRENT YEAR PROGRAM INCOME	37,588.65
05a CURRENT YEAR SECTION 108 PROGRAM INCOME (FOR SI TYPE)	0.00
06 FUNDS RETURNED TO THE LINE-OF-CREDIT	0.00
06a FUNDS RETURNED TO THE LOCAL CDBG ACCOUNT	0.00
07 ADJUSTMENT TO COMPUTE TOTAL AVAILABLE	0.00
08 TOTAL AVAILABLE (SUM, LINES 01-07)	3,348,003.20

PART II: SUMMARY OF CDBG EXPENDITURES

09 DISBURSEMENTS OTHER THAN SECTION 108 REPAYMENTS AND PLANNING/ADMINISTRATION	924,745.00
10 ADJUSTMENT TO COMPUTE TOTAL AMOUNT SUBJECT TO LOW/MOD BENEFIT	0.00
11 AMOUNT SUBJECT TO LOW/MOD BENEFIT (LINE 09 + LINE 10)	924,745.00
12 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	234,278.71
13 DISBURSED IN IDIS FOR SECTION 108 REPAYMENTS	0.00
14 ADJUSTMENT TO COMPUTE TOTAL EXPENDITURES	0.00
15 TOTAL EXPENDITURES (SUM, LINES 11-14)	1,159,023.71
16 UNEXPENDED BALANCE (LINE 08 - LINE 15)	2,188,979.49

PART III: LOW/MOD BENEFIT THIS REPORTING PERIOD

17 EXPENDED FOR LOW/MOD HOUSING IN SPECIAL AREAS	0.00
18 EXPENDED FOR LOW/MOD MULTI-UNIT HOUSING	240,250.00
19 DISBURSED FOR OTHER LOW/MOD ACTIVITIES	592,212.47
20 ADJUSTMENT TO COMPUTE TOTAL LOW/MOD CREDIT	0.00
21 TOTAL LOW/MOD CREDIT (SUM, LINES 17-20)	832,462.47
22 PERCENT LOW/MOD CREDIT (LINE 21/LINE 11)	90.02%

LOW/MOD BENEFIT FOR MULTI-YEAR CERTIFICATIONS

23 PROGRAM YEARS(PY) COVERED IN CERTIFICATION	PY: 2022 PY: 2023 PY: 2024
24 CUMULATIVE NET EXPENDITURES SUBJECT TO LOW/MOD BENEFIT CALCULATION	924,745.00
25 CUMULATIVE EXPENDITURES BENEFITING LOW/MOD PERSONS	832,462.47
26 PERCENT BENEFIT TO LOW/MOD PERSONS (LINE 25/LINE 24)	90.02%

PART IV: PUBLIC SERVICE (PS) CAP CALCULATIONS

27 DISBURSED IN IDIS FOR PUBLIC SERVICES	129,094.03
28 PS UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	9,318.12
29 PS UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	21,040.54
30 ADJUSTMENT TO COMPUTE TOTAL PS OBLIGATIONS	0.00
31 TOTAL PS OBLIGATIONS (LINE 27 + LINE 28 - LINE 29 + LINE 30)	117,371.61
32 ENTITLEMENT GRANT	1,229,243.00
33 PRIOR YEAR PROGRAM INCOME	0.00
34 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PS CAP	0.00
35 TOTAL SUBJECT TO PS CAP (SUM, LINES 32-34)	1,229,243.00
36 PERCENT FUNDS OBLIGATED FOR PS ACTIVITIES (LINE 31/LINE 35)	9.55%

PART V: PLANNING AND ADMINISTRATION (PA) CAP

37 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	234,278.71
38 PA UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	0.00
39 PA UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	0.00
40 ADJUSTMENT TO COMPUTE TOTAL PA OBLIGATIONS	0.00
41 TOTAL PA OBLIGATIONS (LINE 37 + LINE 38 - LINE 39 + LINE 40)	234,278.71
42 ENTITLEMENT GRANT	1,229,243.00
43 CURRENT YEAR PROGRAM INCOME	37,588.65
44 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PA CAP	0.00
45 TOTAL SUBJECT TO PA CAP (SUM, LINES 42-44)	1,266,831.65
46 PERCENT FUNDS OBLIGATED FOR PA ACTIVITIES (LINE 41/LINE 45)	18.49%



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

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

LINE 18 DETAIL: ACTIVITIES TO CONSIDER IN DETERMINING THE AMOUNT TO ENTER ON LINE 18

Plan Year	IDIS Project	IDIS	Activity	Activity Name	Matrix Code	National Objective	Drawn Amount
2021	9	372		ABC - Mountain View Elevator Rehabilitation	14B	LMH	\$144,000.00
2021	11	387		VHDC - Seneca House Renovation	14B	LMH	\$80,000.00
					14B	Matrix Code	\$224,000.00
Total							\$224,000.00

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

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2021	15	357	6797657	Slatington - East Franklin Street Reconstruction	03K	LMA	\$28,183.50
2021	15	357	6834731	Slatington - East Franklin Street Reconstruction	03K	LMA	\$66,885.50
2022	10	389	6834718	Emmas Curb Cuts	03K	LMC	\$35,000.00
2022	15	396	6834718	Whitehall Curb Cuts	03K	LMC	\$90,388.50
					03K	Matrix Code	\$220,457.50
2022	1	385	6788177	Aspire To Autonomy - Emergency Shelter	03T	LMC	\$17,788.67
2022	1	385	6797621	Aspire To Autonomy - Emergency Shelter	03T	LMC	\$10,211.33
					03T	Matrix Code	\$28,000.00
2022	5	397	6834718	Meals on Wheels - Shelf Stable Food Support	05A	LMC	\$20,077.00
					05A	Matrix Code	\$20,077.00
2022	3	384	6788177	LVCIL - PLACE	05B	LMC	\$7,552.27
2022	3	384	6797621	LVCIL - PLACE	05B	LMC	\$2,851.71
2022	3	384	6834718	LVCIL - PLACE	05B	LMC	\$1,462.08
					05B	Matrix Code	\$11,866.06
2022	2	380	6742983	CIS - Career Supports at LCTI	05D	LMC	\$16,943.70
2022	2	380	6788177	CIS - Career Supports at LCTI	05D	LMC	\$7,278.12
2022	2	380	6797621	CIS - Career Supports at LCTI	05D	LMC	\$778.18
2022	4	386	6788177	Manito Life Center - Therapeutic Riding	05D	LMC	\$12,400.00
2022	4	386	6797621	Manito Life Center - Therapeutic Riding	05D	LMC	\$10,725.00
2022	4	386	6834718	Manito Life Center - Therapeutic Riding	05D	LMC	\$6,875.00
					05D	Matrix Code	\$55,000.00
2020	2	318	6742574	Coalition for Appropriate Transportation - Commuter Program	05E	LMC	\$5,823.55
					05E	Matrix Code	\$5,823.55
2022	6	383	6788177	Literacy Center - Adult Literacy Instruction	05H	LMC	\$5,681.88
					05H	Matrix Code	\$5,681.88
2021	2	359	6737573	Catholic Charities - SSIP	05Q	LMC	\$2,645.54
					05Q	Matrix Code	\$2,645.54
2021	9	392	6834731	Alliance for Building Communities - Relocation During Elevator Replacement	08	LMC	\$11,240.92
					08	Matrix Code	\$11,240.92
2020	10	326	6737561	CACLV - Roof and HVAC Emergency Replacement Program	14A	LMH	\$6,420.02
2021	10	373	6737573	CACLV - Emergency Repair Program	14A	LMH	\$101,415.30
2021	10	373	6788504	CACLV - Emergency Repair Program	14A	LMH	\$48,698.43
2021	10	373	6797657	CACLV - Emergency Repair Program	14A	LMH	\$31,145.12
2021	10	373	6834731	CACLV - Emergency Repair Program	14A	LMH	\$43,741.15
					14A	Matrix Code	\$231,420.02
Total							\$592,212.47

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

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity to prevent, prepare for, and respond to Coronavirus	Activity Name	Grant Number	Fund Type	Matrix Code	National Objective	Drawn Amount
2022	1	385	6788177	No	Aspire To Autonomy - Emergency Shelter	B22UC420011	EN	03T	LMC	\$17,788.67
2022	1	385	6797621	No	Aspire To Autonomy - Emergency Shelter	B22UC420011	EN	03T	LMC	\$10,211.33
								03T	Matrix Code	\$28,000.00
2022	5	397	6834718	No	Meals on Wheels - Shelf Stable Food Support	B22UC420011	EN	05A	LMC	\$20,077.00
								05A	Matrix Code	\$20,077.00



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Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity to prevent, prepare for, and respond to Coronavirus	Activity Name	Grant Number	Fund Type	Matrix Code	National Objective	Drawn Amount
2022	3	384	6788177	No	LVCIL - PLACE	B22UC420011	EN	05B	LMC	\$7,552.27
2022	3	384	6797621	No	LVCIL - PLACE	B22UC420011	EN	05B	LMC	\$2,851.71
2022	3	384	6834718	No	LVCIL - PLACE	B22UC420011	EN	05B	LMC	\$1,462.08
								05B	Matrix Code	\$11,866.06
2022	2	380	6742983	No	CIS - Career Supports at LCTI	B22UC420011	EN	05D	LMC	\$16,943.70
2022	2	380	6788177	No	CIS - Career Supports at LCTI	B22UC420011	EN	05D	LMC	\$7,278.12
2022	2	380	6797621	No	CIS - Career Supports at LCTI	B22UC420011	EN	05D	LMC	\$778.18
2022	4	386	6788177	No	Manito Life Center - Therapeutic Riding	B22UC420011	EN	05D	LMC	\$12,400.00
2022	4	386	6797621	No	Manito Life Center - Therapeutic Riding	B22UC420011	EN	05D	LMC	\$10,725.00
2022	4	386	6834718	No	Manito Life Center - Therapeutic Riding	B22UC420011	EN	05D	LMC	\$6,875.00
								05D	Matrix Code	\$55,000.00
2020	2	318	6742574	No	Coalition for Appropriate Transportation - Commuter Program	B20UC420011	EN	05E	LMC	\$5,823.55
								05E	Matrix Code	\$5,823.55
2022	6	383	6788177	No	Literacy Center - Adult Literacy Instruction	B22UC420011	EN	05H	LMC	\$5,681.88
								05H	Matrix Code	\$5,681.88
2021	2	359	6737573	No	Catholic Charities - SSIP	B21UC420011	EN	05Q	LMC	\$2,645.54
								05Q	Matrix Code	\$2,645.54
				No	Activity to prevent, prepare for, and respond to Coronavirus					\$129,094.03
Total										\$129,094.03

LINE 37 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 37

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2022	7	379	6742983	NPLS - Fair Housing Legal Help	21A		\$610.03
2022	7	379	6788177	NPLS - Fair Housing Legal Help	21A		\$9,561.02
2022	7	379	6797621	NPLS - Fair Housing Legal Help	21A		\$1,828.95
2022	16	378	6742981	Administration	21A		\$39,398.05
2022	16	378	6788177	Administration	21A		\$41,948.04
2022	16	378	6797661	Administration	21A		\$81,864.04
2022	16	378	6834713	Administration	21A		\$59,068.58
					21A	Matrix Code	\$234,278.71
Total							\$234,278.71



**PART I: SUMMARY OF CDBG-CV RESOURCES**

01 CDBG-CV GRANT	2,025,770.00
02 FUNDS RETURNED TO THE LINE-OF-CREDIT	0.00
03 FUNDS RETURNED TO THE LOCAL CDBG ACCOUNT	0.00
04 TOTAL CDBG-CV FUNDS AWARDED	2,025,770.00

**PART II: SUMMARY OF CDBG-CV EXPENDITURES**

05 DISBURSEMENTS OTHER THAN SECTION 108 REPAYMENTS AND PLANNING/ADMINISTRATION	1,062,104.59
06 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	64,180.97
07 DISBURSED IN IDIS FOR SECTION 108 REPAYMENTS	0.00
08 TOTAL EXPENDITURES (SUM, LINES 05 - 07)	1,126,285.56
09 UNEXPENDED BALANCE (LINE 04 - LINE8 )	899,484.44

**PART III: LOWMOD BENEFIT FOR THE CDBG-CV GRANT**

10 EXPENDED FOR LOW/MOD HOUSING IN SPECIAL AREAS	0.00
11 EXPENDED FOR LOW/MOD MULTI-UNIT HOUSING	0.00
12 DISBURSED FOR OTHER LOW/MOD ACTIVITIES	1,062,104.59
13 TOTAL LOW/MOD CREDIT (SUM, LINES 10 - 12)	1,062,104.59
14 AMOUNT SUBJECT TO LOW/MOD BENEFIT (LINE 05)	1,062,104.59
15 PERCENT LOW/MOD CREDIT (LINE 13/LINE 14)	100.00%

**PART IV: PUBLIC SERVICE (PS) CALCULATIONS**

16 DISBURSED IN IDIS FOR PUBLIC SERVICES	1,062,104.59
17 CDBG-CV GRANT	2,025,770.00
18 PERCENT OF FUNDS DISBURSED FOR PS ACTIVITIES (LINE 16/LINE 17)	52.43%

**PART V: PLANNING AND ADMINISTRATION (PA) CAP**

19 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	64,180.97
20 CDBG-CV GRANT	2,025,770.00
21 PERCENT OF FUNDS DISBURSED FOR PA ACTIVITIES (LINE 19/LINE 20)	3.17%



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

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

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

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2019	7	340	6576947	LCTI COVID Hardship Scholarships	05H	LMC	\$3,729.50
			6643215	LCTI COVID Hardship Scholarships	05H	LMC	\$8,411.50
			6704731	LCTI COVID Hardship Scholarships	05H	LMC	\$9,110.00
			6742533	LCTI COVID Hardship Scholarships	05H	LMC	\$15,914.00
			6835567	LCTI COVID Hardship Scholarships	05H	LMC	\$4,211.00
	17	338	6576947	Catholic Charities - CV Rent Conciliation Program	05Q	LMC	\$51,916.38
			6643215	Catholic Charities - CV Rent Conciliation Program	05Q	LMC	\$21,862.21
			6704731	Catholic Charities - CV Rent Conciliation Program	05Q	LMC	\$23,908.21
	20	349	6576949	Conference of Churches - CV Pathways	05Q	LMC	\$40,143.06
			6643215	Conference of Churches - CV Pathways	05Q	LMC	\$29,326.48
	22	374	6742564	Literacy Center - CV Workforce Development	05H	LMC	\$16,837.33
	23	347	6576947	NPLS - COVID Legal Aide	05C	LMC	\$9,623.29
			6643215	NPLS - COVID Legal Aide	05C	LMC	\$2,338.53
			6665458	NPLS - COVID Legal Aide	05C	LMC	\$3,482.19
			6704731	NPLS - COVID Legal Aide	05C	LMC	\$1,916.57
			6742533	NPLS - COVID Legal Aide	05C	LMC	\$398.01
			6835567	NPLS - COVID Legal Aide	05C	LMC	\$2,241.41
	25	341	6576947	Sights for Hope - CV Virtual Programs and Supplies	05B	LMC	\$8,350.00
		342	6576947	Via of the Lehigh Valley - CV Remote Technology	05B	LMC	\$3,612.70
			6643215	Via of the Lehigh Valley - CV Remote Technology	05B	LMC	\$423.00
		375	6742564	LVCIL - CV Tech Adaptations for You	05B	LMC	\$3,024.25
			6835567	LVCIL - CV Tech Adaptations for You	05B	LMC	\$7,843.77
	26	343	6576947	MOW - CV Free Meals for LMI Elderly	05A	LMC	\$4,935.00
			6643215	MOW - CV Free Meals for LMI Elderly	05A	LMC	\$7,665.00
			6665458	MOW - CV Free Meals for LMI Elderly	05A	LMC	\$3,885.00
			6742533	MOW - CV Free Meals for LMI Elderly	05A	LMC	\$7,350.00
		344	6576947	WCHI - CV Food and Hygiene Pantry	05W	LMC	\$14,184.18
			6704731	WCHI - CV Food and Hygiene Pantry	05W	LMC	\$5,492.95
		345	6576947	Casa Guadalupe Center - CV Food Pantry	05W	LMC	\$5,000.00
		350	6576947	Grace Lutheran Church - CV Food Pantry	05W	LMA	\$3,310.00
		352	6643215	Parkland CARES - CV Food and Hygiene Pantry	05W	LMC	\$12,120.71
			6665458	Parkland CARES - CV Food and Hygiene Pantry	05W	LMC	\$6,866.24
			6704731	Parkland CARES - CV Food and Hygiene Pantry	05W	LMC	\$4,058.32
			6742533	Parkland CARES - CV Food and Hygiene Pantry	05W	LMC	\$1,954.73
		370	6707080	Kellyn Foundation - Mobile Fresh Food Pantry	05W	LMC	\$70,400.00
		376	6742564	Parkland CARES - CV Food Pantry Stock, Appliances, Tablets	05W	LMC	\$7,587.95
			6835567	Parkland CARES - CV Food Pantry Stock, Appliances, Tablets	05W	LMC	\$17,412.05



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Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2019	26	377	6742564	WCHI - CV Food Pantry Appliances and Lighting	05W	LMC	\$32,881.94
			6835567	WCHI - CV Food Pantry Appliances and Lighting	05W	LMC	\$4,652.80
		398	6835577	Second Harvest - CV Fresh Produce Distribution	05W	LMC	\$22,050.00
		399	6835577	WCHI - CV - Hygiene, Toiletries, and Food Distribution	05W	LMC	\$57,297.96
	28	346	6576947	Casa Guadalupe Center - CV Housing Stabilization	05Q	LMC	\$50,707.55
			6576949	Casa Guadalupe Center - CV Housing Stabilization	05Q	LMC	\$50,000.00
			6643215	Casa Guadalupe Center - CV Housing Stabilization	05Q	LMC	\$51,867.95
			6704731	Casa Guadalupe Center - CV Housing Stabilization	05Q	LMC	\$71,517.65
			6742533	Casa Guadalupe Center - CV Housing Stabilization	05Q	LMC	\$60,170.94
			6835608	Casa Guadalupe Center - CV Housing Stabilization	05Q	LMC	\$69,650.32
		348	6643215	LVCIL - COVID Communication Support Program	05B	LMC	\$32,367.06
			6665458	LVCIL - COVID Communication Support Program	05B	LMC	\$11,776.69
			6704731	LVCIL - COVID Communication Support Program	05B	LMC	\$20,976.14
			6742533	LVCIL - COVID Communication Support Program	05B	LMC	\$12,354.64
			6835577	LVCIL - COVID Communication Support Program	05B	LMC	\$42,525.44
		351	6742533	Sixth Street Shelter - CV Rental Assistance	05Q	LMC	\$20,394.99
		369	6704745	Aspire to Autonomy - CV	03T	LMC	\$5,985.34
			6835567	Aspire to Autonomy - CV	03T	LMC	\$4,081.66
<b>Total</b>							<b>\$1,062,104.59</b>

LINE 16 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 16

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2019	7	340	6576947	LCTI COVID Hardship Scholarships	05H	LMC	\$3,729.50
			6643215	LCTI COVID Hardship Scholarships	05H	LMC	\$8,411.50
			6704731	LCTI COVID Hardship Scholarships	05H	LMC	\$9,110.00
			6742533	LCTI COVID Hardship Scholarships	05H	LMC	\$15,914.00
			6835567	LCTI COVID Hardship Scholarships	05H	LMC	\$4,211.00
	17	338	6576947	Catholic Charities - CV Rent Conciliation Program	05Q	LMC	\$51,916.38
			6643215	Catholic Charities - CV Rent Conciliation Program	05Q	LMC	\$21,862.21
			6704731	Catholic Charities - CV Rent Conciliation Program	05Q	LMC	\$23,908.21
	20	349	6576949	Conference of Churches - CV Pathways	05Q	LMC	\$40,143.06
			6643215	Conference of Churches - CV Pathways	05Q	LMC	\$29,326.48
	22	374	6742564	Literacy Center - CV Workforce Development	05H	LMC	\$16,837.33
	23	347	6576947	NPLS - COVID Legal Aide	05C	LMC	\$9,623.29
			6643215	NPLS - COVID Legal Aide	05C	LMC	\$2,338.53
			6665458	NPLS - COVID Legal Aide	05C	LMC	\$3,482.19
			6704731	NPLS - COVID Legal Aide	05C	LMC	\$1,916.57
			6742533	NPLS - COVID Legal Aide	05C	LMC	\$398.01
			6835567	NPLS - COVID Legal Aide	05C	LMC	\$2,241.41
	25	341	6576947	Sights for Hope - CV Virtual Programs and Supplies	05B	LMC	\$8,350.00
		342	6576947	Via of the Lehigh Valley - CV Remote Technology	05B	LMC	\$3,612.70
			6643215	Via of the Lehigh Valley - CV Remote Technology	05B	LMC	\$423.00
		375	6742564	LVCIL - CV Tech Adaptations for You	05B	LMC	\$3,024.25
			6835567	LVCIL - CV Tech Adaptations for You	05B	LMC	\$7,843.77
	26	343	6576947	MOW - CV Free Meals for LMI Elderly	05A	LMC	\$4,935.00
			6643215	MOW - CV Free Meals for LMI Elderly	05A	LMC	\$7,665.00
			6665458	MOW - CV Free Meals for LMI Elderly	05A	LMC	\$3,885.00
			6742533	MOW - CV Free Meals for LMI Elderly	05A	LMC	\$7,350.00
		344	6576947	WCHI - CV Food and Hygiene Pantry	05W	LMC	\$14,184.18
			6704731	WCHI - CV Food and Hygiene Pantry	05W	LMC	\$5,492.95
		345	6576947	Casa Guadalupe Center - CV Food Pantry	05W	LMC	\$5,000.00
		350	6576947	Grace Lutheran Church - CV Food Pantry	05W	LMA	\$3,310.00
		352	6643215	Parkland CARES - CV Food and Hygiene Pantry	05W	LMC	\$12,120.71
			6665458	Parkland CARES - CV Food and Hygiene Pantry	05W	LMC	\$6,866.24
			6704731	Parkland CARES - CV Food and Hygiene Pantry	05W	LMC	\$4,058.32
			6742533	Parkland CARES - CV Food and Hygiene Pantry	05W	LMC	\$1,954.73
		370	6707080	Kellyn Foundation - Mobile Fresh Food Pantry	05W	LMC	\$70,400.00
		376	6742564	Parkland CARES - CV Food Pantry Stock, Appliances, Tablets	05W	LMC	\$7,587.95





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IDIS

Plan IDIS Year Project	Project Title and Description		Program	Project Estimate	Committed Amount	Amount Drawn Thru Report Year	Amount Available to Draw	Amount Drawn in Report Year
2022 1	Aspire To Autonomy - Emergency Shelter	Operating costs to start-up a shelter for single, female victims of human trafficking. The funding will be utilized to cover program expenses such as salaries/payroll expenses including taxes for a one-year period beginning October 1, 2022 through September 30, 2023.	CDBG	\$28,000.00	\$28,000.00	\$28,000.00	\$0.00	\$28,000.00
2	Communities in Schools of the Lehigh Valley - School-to-Career Program	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.	CDBG	\$25,000.00	\$25,000.00	\$25,000.00	\$0.00	\$25,000.00
3	Lehigh Valley Center for Independent Living - PLACE	Program will provide 40 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.	CDBG	\$25,000.00	\$11,866.06	\$11,866.06	\$0.00	\$11,866.06
4	Manito Life Center - Therapeutic Riding for At-Risk Adolescents	Provision of once a week sessions for 10 weeks, to 30 adolescents having a history of stress, anxiety, eating disorders, suicidal tendencies, and a risk for violent behaviors. New pilot program through LVHN, Dr. Hatim Omar.	CDBG	\$30,000.00	\$30,000.00	\$30,000.00	\$0.00	\$30,000.00
5	Meals on Wheels - Shelf Stable Food Support	Home delivery of free, household supplies and shelf-stable food items to 25 seniors and/or disabled adults who lack the ability to access food pantries on a regular basis.	CDBG	\$20,077.00	\$20,077.00	\$20,077.00	\$0.00	\$20,077.00
6	The Literacy Center - Empowering Adults with Literacy	Funding to prepare 30 Lehigh County adults to successfully pursue their professional and educational goals through literacy instruction.	CDBG	\$15,000.00	\$15,000.00	\$5,681.88	\$9,318.12	\$5,681.88
7	North Penn Legal Services - LMI Legal Help	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.	CDBG	\$12,000.00	\$12,000.00	\$12,000.00	\$0.00	\$12,000.00
8	Catasauqua Borough - Fluoride Treatment System Improvements	Funding to make upgrade improvements to the fluoride containment equipment and building expansion.	CDBG	\$169,236.58	\$0.00	\$0.00	\$0.00	\$0.00
9	Coplay Borough - ADA Door at Library	Replacement of the front doors with an automatic ADA door at the Library.	CDBG	\$21,195.00	\$21,195.00	\$0.00	\$21,195.00	\$0.00
10	Emmaus Borough - Curb Cuts	Funds will be provided to reconstruct 32 curb cuts at various locations in the Borough.	CDBG	\$35,000.00	\$35,000.00	\$35,000.00	\$0.00	\$35,000.00

U.S. DEPARTMENT OF HOUSING AND URBAN  
DEVELOPMENT  
OFFICE OF COMMUNITY PLANNING AND DEVELOPMENT  
PR06 - Summary of Consolidated Plan Projects for Report  
Year

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Plan IDIS Year Project	Project Title and Description		Program	Project Estimate	Committed Amount	Amount Drawn Thru Report Year	Amount Available to Draw	Amount Drawn in Report Year
2022 11	Fountain Hill Borough - Jeter Reconstruction	Funds will be provided to reconstruct the following streets: Kieffer Street to Hoffert Street and Hoffert Street to Bergen Street.	CDBG	\$257,100.00	\$257,100.00	\$0.00	\$257,100.00	\$0.00
12	Salisbury Township - Sanitary Sewer Rehabilitation	Funds will be provided to reconstruct 4,551 linear feet of main line and 110 lateral reinstatements.	CDBG	\$50,000.00	\$50,000.00	\$0.00	\$50,000.00	\$0.00
13	Slatington Borough # 1 - East South Rehabilitation	Funds will be provided for the reconstruction of East South from Main Street to 2nd Street.	CDBG	\$95,718.00	\$95,718.50	\$0.00	\$95,718.50	\$0.00
14	Slatington Borough # 2 - East South Rehabilitation	Funds will be provided for the reconstruction of East South from 2nd towards Fairview Street.	CDBG	\$96,867.92	\$96,867.90	\$0.00	\$96,867.90	\$0.00
15	Whitehall Township - Curb Cuts	Funds will be provided to reconstruct 34 curb cuts at various locations in the Borough.	CDBG	\$115,200.00	\$90,388.50	\$90,388.50	\$0.00	\$90,388.50
16	Administration	Funds for oversight, management, and administration of the CDBG Program.	CDBG	\$233,848.00	\$222,278.71	\$222,278.71	\$0.00	\$222,278.71
17	HOME Administration	Funds for oversight, management, and administration of the HOME Program.	HOME	\$75,000.00	\$0.00	\$0.00	\$0.00	\$0.00
18	CHDO Set-Aside	HOME funds will be used to assist a CHDO to increase the number of affordable housing units in the County for owners and renters by assisting with acquisition, soft costs, construction, and rehabilitation.	HOME	\$112,500.00	\$0.00	\$0.00	\$0.00	\$0.00
19	Affordable Housing Project	HOME funds will be used to assist in the development of affordable housing in the County for owners and renters by assisting with acquisition, soft costs, construction, and rehabilitation.	HOME	\$562,500.00	\$0.00	\$0.00	\$0.00	\$0.00

## CR-65 – Fair Housing

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

1. Appointed a Fair Housing Officer to implement and oversee the Fair Housing Plan and the County's steps to affirmatively further fair housing (responsibilities include accepting complaints, record keeping and investigation in conjunction with NPLS).
2. Continued to enlist NPLS in the enforcement of fair housing through public education and outreach.
3. Continued to fund fair housing providers to respond to housing discrimination complaints.
4. Continued to investigate testing and auditing of fair housing practices through its regional fair housing providers.
5. Educated and attempted to overcome the "Not in My Back Yard" attitude in some areas of the County through its fair housing providers.
6. Continued to make every attempt to increase geographic choice in housing by providing links on its website for its low-income households.
7. Promoted desegregation of public housing.
8. Updated 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).
9. Assisted 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.
10. On an annual basis, Lehigh County continued to declare April to be Fair Housing Month via proclamation, in conjunction with holding an annual fair housing workshop.
11. Provided updated Housing Discrimination information with public outreach efforts.

### 2018 Analysis of Impediments to Fair Housing Choice

In February 2019, Lehigh County prepared and submitted to HUD an Analysis of Impediments to Fair Housing Choice. The Analysis of Impediment identified the following impediments and strategies:

- **Impediment 1: Lack of Affordable Housing** - There is a lack of affordable housing in Lehigh County due to the influx in the number of unskilled and semi-skilled workers who have moved into the County, which has created a high demand and a corresponding increase in the cost of rental and sales housing.
- **Impediment 2: Lack of Accessible Housing** - There is a lack of accessible housing in Lehigh County since the supply of accessible housing has not kept pace with the demand caused by the increase in the percentage of elderly persons in Lehigh County and more disabled persons desiring to live independently.
- **Impediment 3: Barriers Limiting Housing Choice** - There are physical, economic, and social barriers in Lehigh County which limit housing choices and housing opportunities for low-income

households, minorities, and the disabled members of the County's population.

- **Impediment 4: Lack of Housing Awareness** - There is a lack of knowledge and understanding concerning the rights of individuals, families, and members of the protected classes in regard to the Fair Housing Act (FHA) and awareness of discriminatory practices.
- **Impediment 5: Lack of Economic Opportunities** - There is a lack of economic opportunities in the County for lower-income households to increase their income and thus improve their choices of housing.

DRAFT

## CR-70 – Citizen Participation

Lehigh County placed the FY 2022 CAPER document on public display for a period of 15 days beginning on Monday, December 4, 2023, through Monday, December 18, 2023. A copy of the Public Notice was published in “The Morning Call” on Friday, December 1, 2023.

Copies of the FY 2022 CAPER are available for public inspection at the following locations in Lehigh County, as well as on the Lehigh County website [www.lehighcounty.org/Departments/Community-Economic-Development](http://www.lehighcounty.org/Departments/Community-Economic-Development):

- **Lehigh County Department of Community and Economic Development** - Lehigh County Government Center, 17 South 7<sup>th</sup> Street, Allentown, PA 18101
- **Allentown Public Library** - 1210 West Hamilton Street, Allentown, PA 18102
- **Catasauqua Public Library** - 302 Bridge Street, Catasauqua, PA 18032
- **Coplay Library** - 49 South 5<sup>th</sup> Street, Coplay, PA 18037
- **Emmaus Public Library** - 11 East Main Street, Emmaus, PA 18049
- **Lower Macungie Library** - 3450 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

**LEHIGH COUNTY, PA  
COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) AND  
HOME INVESTMENT PARTNERSHIP (HOME) PROGRAMS**

**FY 2022 CONSOLIDATED ANNUAL PERFORMANCE  
AND EVALUATION REPORT (CAPER)**

Notice is hereby given that Lehigh County intends to submit its FY 2022 Consolidated Annual Performance and Evaluation Report (CAPER) to the U.S. Department of Housing and Urban Development on or before Friday, December 29, 2023.

In accordance with Title I of the National Affordable Housing Act of 1990, as amended, Lehigh County has prepared its Fiscal Year 2022 Consolidated Annual Performance and Evaluation Report (CAPER) for its Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) Programs. This report describes the progress and accomplishments of housing assistance and other community development activities designed to benefit low- and moderate-income persons and households in Lehigh County through various federal funding programs during the Program Year October 1, 2022 through September 30, 2023.

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All interested persons are encouraged to review the FY 2022 CAPER. Written comments may be addressed to Ms. Laurie A. Moyer, Grants & Housing Manager, Government Center, 17 South Seventh Street, Allentown, PA 18101, or by email at [lauriemoyer@lehighcounty.org](mailto:lauriemoyer@lehighcounty.org). Oral comments may be made by calling (610) 871-1964. All comments on the CAPER will be considered until Monday, December 18, 2023.

Laurie A. Moyer  
Grants Management Specialist, Lehigh County

Published: Friday, December 1, 2023

Order ID: 7538391

\* Agency Commission not included

**GROSS PRICE \* :** **\$849.76**

**PACKAGE NAME:** TMC Legal/Public Notices

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**Zone:** Full Run

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**Preview**

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