
LEHIGH COUNTY, PENNSYLVANIA

DEPARTMENT OF COMMUNITY & ECONOMIC DEVELOPMENT

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

FY 2023 Annual Action Plan

August 15, 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



Table of Contents

PART I. ES: EXECUTIVE SUMMARY

| | | |
|-------|---|----|
| AP-05 | Executive Summary – 24 CFR 91.200(c), 91.220(b) | 1 |
| 1. | Introduction | 1 |
| 2. | Summary of the Objectives and Outcomes Identified in the Plan | 15 |
| 3. | Evaluation of Past Performance | 18 |
| 4. | Summary of Citizen Participation Process and Consultation Process | 18 |
| 5. | Summary of Public Comments..... | 20 |
| 6. | Summary of Comments or Views Not Accepted and the Reasons For Not Accepting Them | 20 |
| 7. | Summary | 21 |

PART II. PR: THE PROCESS

| | | |
|-------|--|----|
| PR-05 | Lead & Responsible Agencies – 91.200(b) | 22 |
| 1. | Agency/Entity Responsible for Preparing/Administering the Plan | 22 |
| AP-10 | Consultation – 91.100, 91.200(b), 91.215(l) | 24 |
| 1. | Introduction | 24 |
| 2. | Agencies, Groups, Organizations, and Others Who Participated In the Process and Consultations | 27 |
| AP-12 | Participation – 91.105, 91.200(c)..... | 38 |
| 1. | Summary of Citizen Participation Process/Efforts..... | 38 |

PART III. ANNUAL ACTION PLAN

| | | |
|-------|---|----|
| AP-15 | Expected Resources – 91.220(c)(1,2)..... | 42 |
| AP-20 | Annual Goals & Objectives – 91.420, 91.220(c)(3)&(e) | 46 |
| AP-35 | Projects – 91.220(d) | 52 |
| AP-38 | Project Summary..... | 55 |
| AP-50 | Geographic Distribution – 91.220(f) | 66 |
| AP-55 | Affordable Housing – 91.220(g) | 70 |
| AP-60 | Public Housing – 91.220(h) | 71 |
| AP-65 | Homeless and Other Special Needs Activities – 91.220(i) | 73 |
| AP-75 | Barriers to Affordable Housing – 91.220(j) | 78 |
| AP-85 | Other Actions – 91.220(k) | 81 |
| AP-90 | Program Specific Requirements – 91.220(l)(1,2,4)..... | 88 |

PART IV. APPENDIX

SF 424 Form

Certifications

Resale and Recapture Policy

Citizen Participation



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

1. Introduction

As a Federal Entitlement, Lehigh County is required to complete an annual application for the use of the Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) funds to the U.S. Department of Housing and Urban Development (HUD). The Annual Action Plan is a guide to how the County will allocate its resources for specific activities that support the Goals and Objectives of Lehigh County's Five-Year Consolidated Plan. This is Lehigh County's fifth Annual Action Plan as a part of the FY 2019-2023 Five Year Consolidated Plan. The Five-Year Consolidated Plan describes the housing and non-housing needs of County residents and presents a five-year strategy to address those needs. The FY 2023 Annual Action Plan for Lehigh County includes the County's CDBG and HOME Programs and outlines which activities the County will undertake during the program year beginning October 1, 2023, and ending September 30, 2024. Lehigh County's Department of Community and Economic Development is the lead entity and administrator for the CDBG and HOME funds.

The FY 2023 Annual Action Plan outlines the actions to be undertaken in Fiscal Year 2023 with the Federal resources allocated to Lehigh County. The FY 2023 Annual Action Plan excludes the Cities of Allentown and Bethlehem (despite being located within Lehigh County) since they both are Federal Entitlements that receive their own CDBG and HOME allocations from HUD. The CDBG and HOME Programs and activities outlined in this FY 2023 Annual Action Plan will principally benefit low- and moderate-income persons and will provide funding to targeted areas of the County where there is the highest percentage of low- and moderate-income residents. The Annual Action Plan does not incorporate the Public Housing Authority's Comprehensive Grant (Comp

Grant) into this consolidated plan and application, but the public housing authority participated in the planning process for the development of this plan.

The Five-Year Consolidated Plan relied upon efforts of many individuals, organizations, and citizens, in the development of a comprehensive strategy to address the needs of the County. The goal of Lehigh County is to improve the quality of life for County residents by funding improvements to public facilities, infrastructure, public services, and by retaining and increasing the stock of affordable owner and rental housing units.

Available Funds:

The following financial resources are included in the FY 2023 Annual Action Plan which the County will receive to address the priority needs and specific objectives identified in Lehigh County's Five-Year Consolidated Plan. Lehigh County anticipates it will receive the following Federal funds during the FY 2023 program year:

| Entitlement Funds | Amount |
|----------------------------|------------------------|
| FY 2023 CDBG Funds | \$ 1,247,023.00 |
| CDBG Program Income | \$ 0.00 |
| FY 2023 HOME Funds | \$ 574,620.00 |
| Local HOME Match | \$ 0.00 |
| HOME Program Income | \$ 0.00 |
| Totals: | \$ 1,821,643.00 |

Table 1 - Federal Resources

FY 2023 CDBG Program Budget:

Lehigh County proposes to undertake the following activities with the FY 2023 CDBG funds:

- 1. Aspire To Autonomy - Emergency Shelter - \$25,000.00**
- 2. Communities in Schools of the Lehigh Valley - Career Supports at LCTI - \$25,000.00**
- 3. Lehigh Valley Center for Independent Living - People Living in Accessible Community Environments (PLACE) Program - \$25,000.00**
- 4. Manito Life Center -Therapeutic Riding for At-Risk Adolescents - \$25,000.00**
- 5. Big Brothers Big Sisters - Sports Buddies - \$20,422.00**
- 6. Catholic Charities - Case Management and Rent Assistance - \$29,220.00**
- 7. North Penn Legal Services - LMI Legal Help - \$12,000.00**
- 8. Whitehall Township - Mickley-Prydun Farm - \$170,490.00**

- 9. Coplay Borough - Fire Equipment - \$59,640.00**
- 10. Emmaus Borough - Curb Cuts - \$157,549.19**
- 11. Slatington Borough - North St. Reconstruction - \$87,399.08**
- 12. Slatington Borough - 5th St. Reconstruction - \$90,898.73**
- 13. Whitehall Township - Curb Cuts - \$282,000.00**
- 14. CDBG Administration - \$237,404.00**
- Total CDBG: \$1,247,023.00**

FY 2023 HOME Program Budget:

Lehigh County proposes to undertake the following activities with the FY 2023 HOME funds:

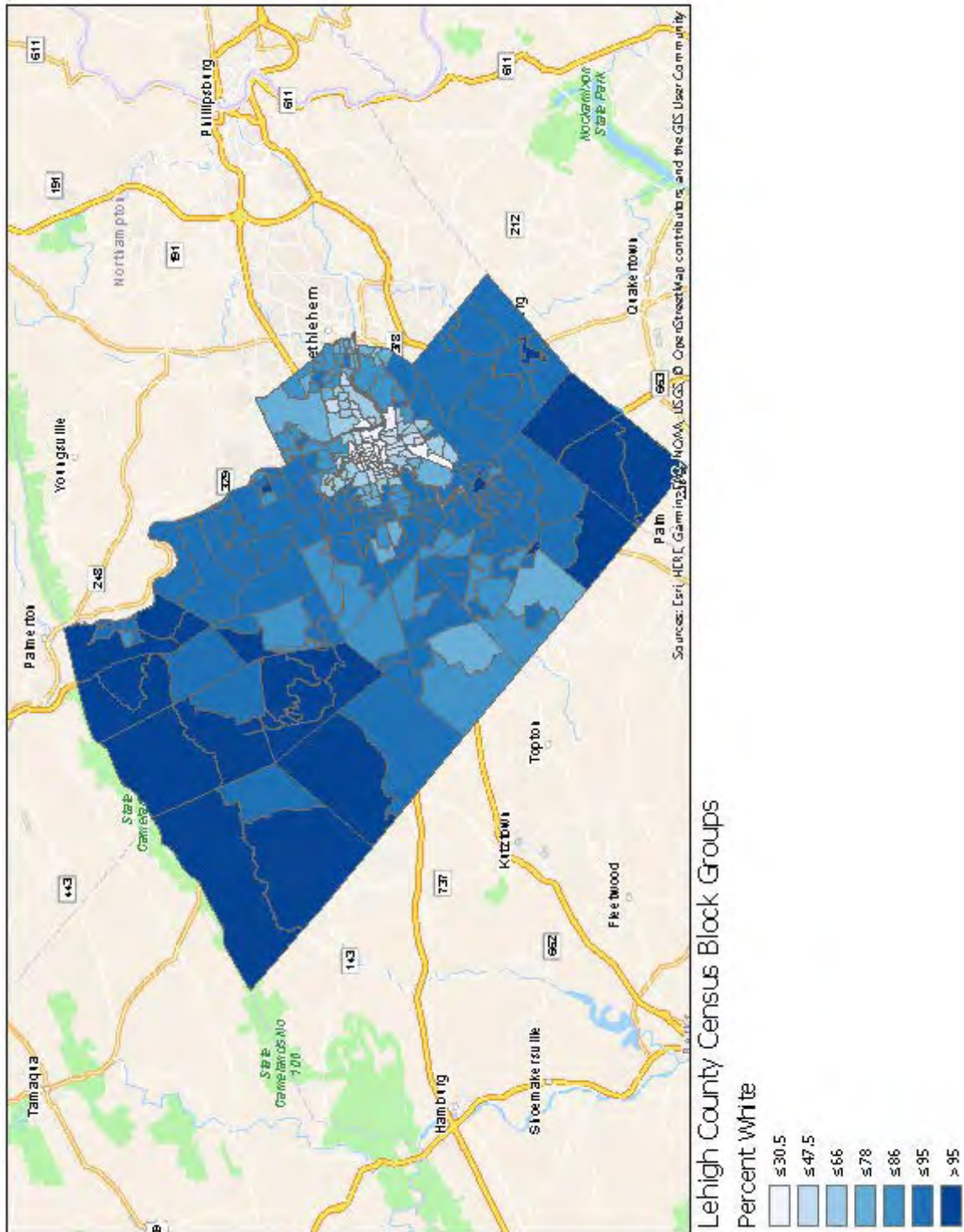
- 1. HOME Administration - \$57,462.00**
- 2. CHDO Set-Aside - \$85,455.00**
- 3. Affordable Housing Project - Valley Housing Development Corporation - \$400,000.00**
- 4. Affordable Housing Project - \$31,703.00**
- Total HOME: \$574,620.00**

Maps:

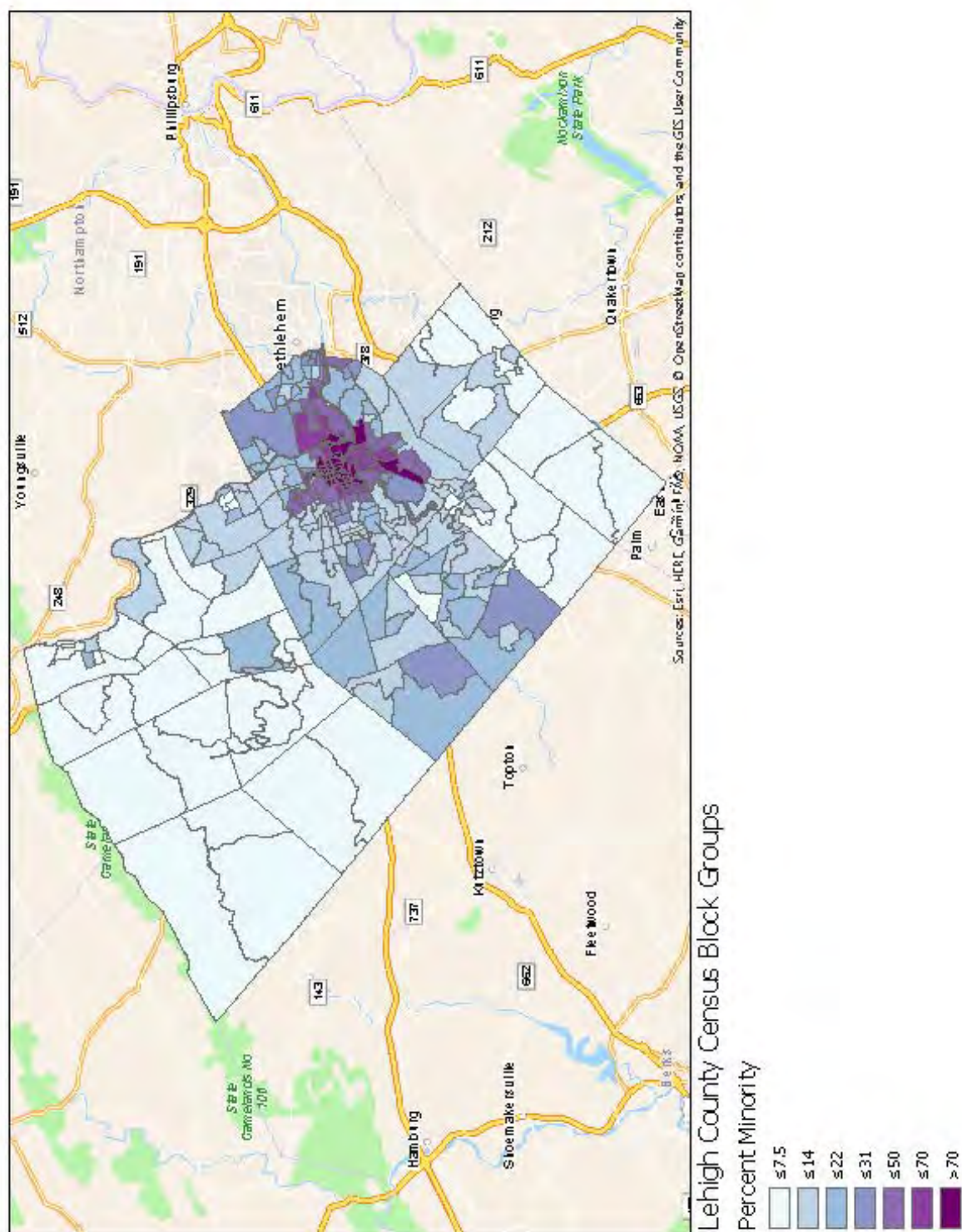
Below are the maps which illustrate the demographic characteristics of the Lehigh County:

- Percent White Population by Block Group
- Percent Minority Population by Block Group
- Percent Population Age 65+ by Block Group
- Residents Age 65+ by Block Group
- Housing Units by Block Group
- Population Density by Block Group
- Percent Owner-Occupied Housing Units by Block Group
- Percent Renter-Occupied Housing Units by Block Group
- Percent Vacant Housing Units by Block Group
- Low/Moderate Income Percentage by Block Group
- Low/Moderate Income Percentage by Block Group with Minority Population Overlay

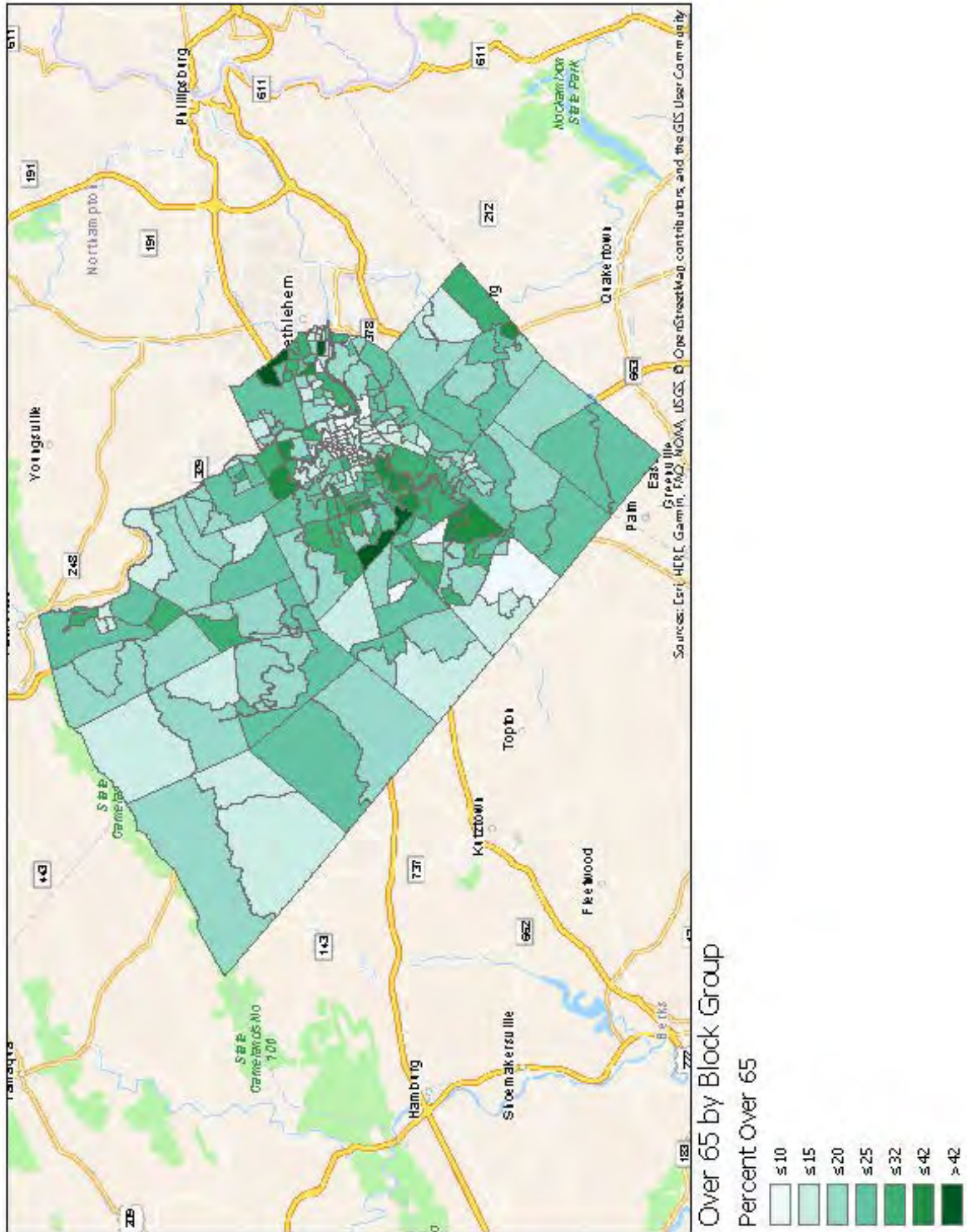
Percent White Population by Block Group



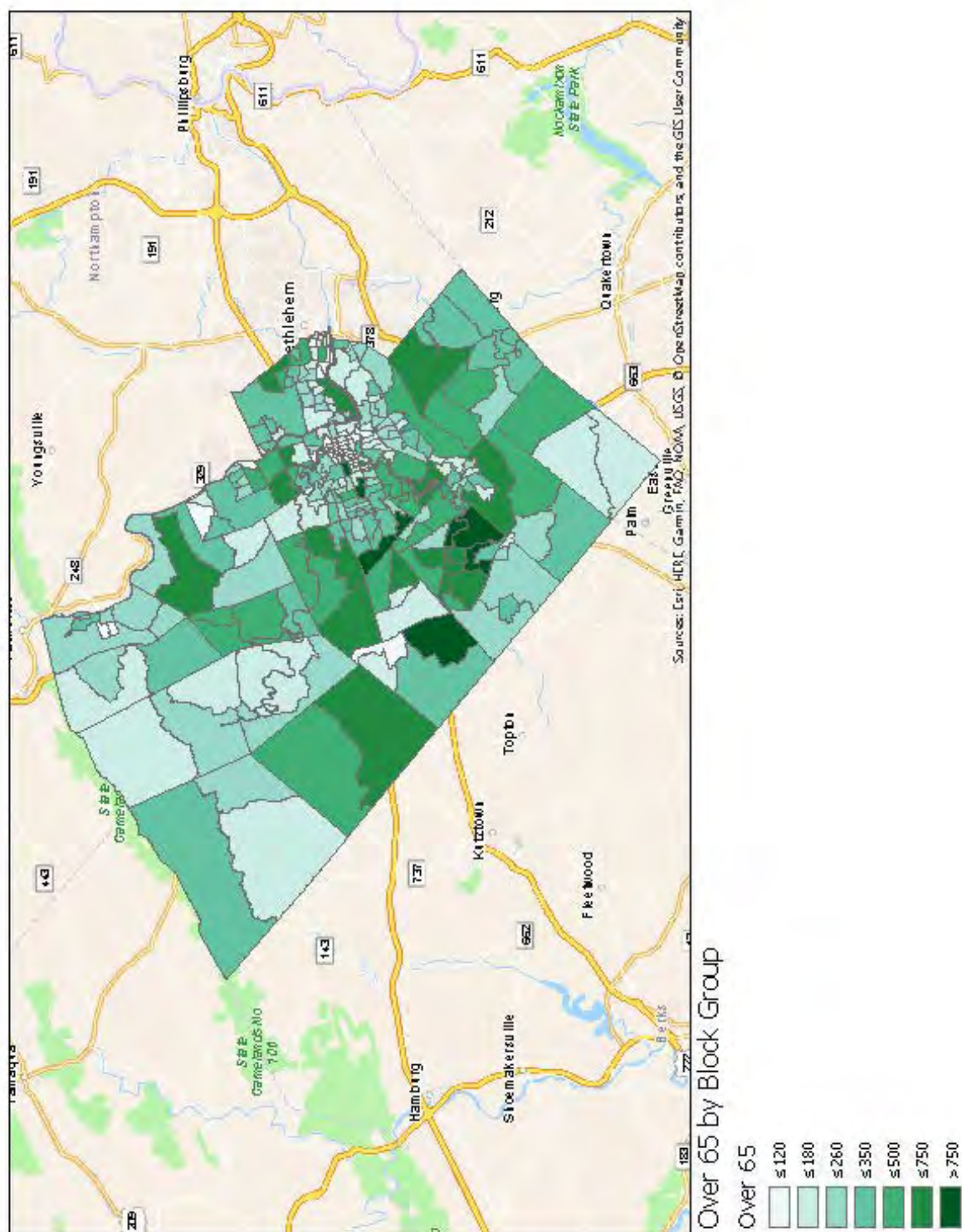
Percent Minority Population by Block Group



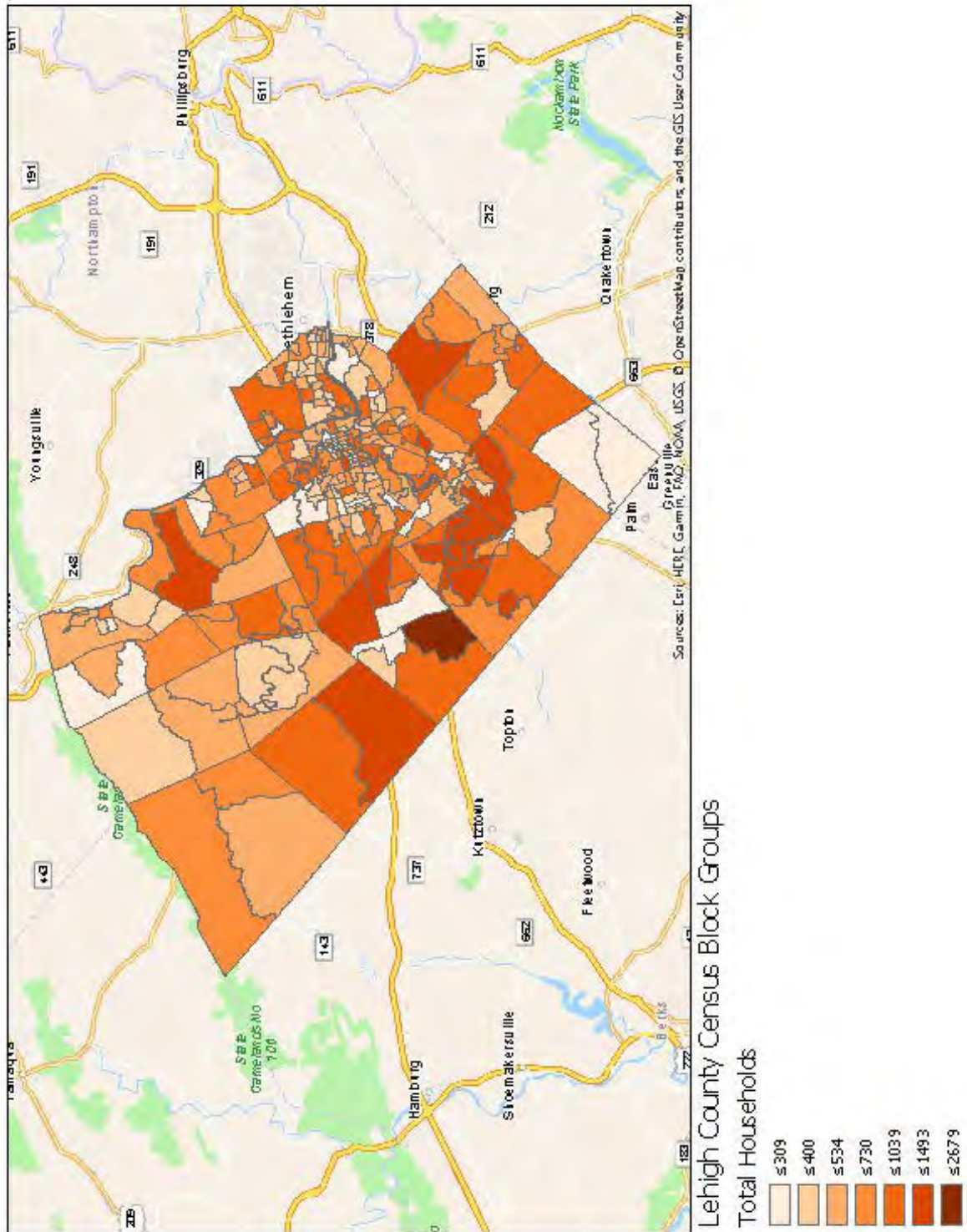
Percent Population Age 65+ by Block Group



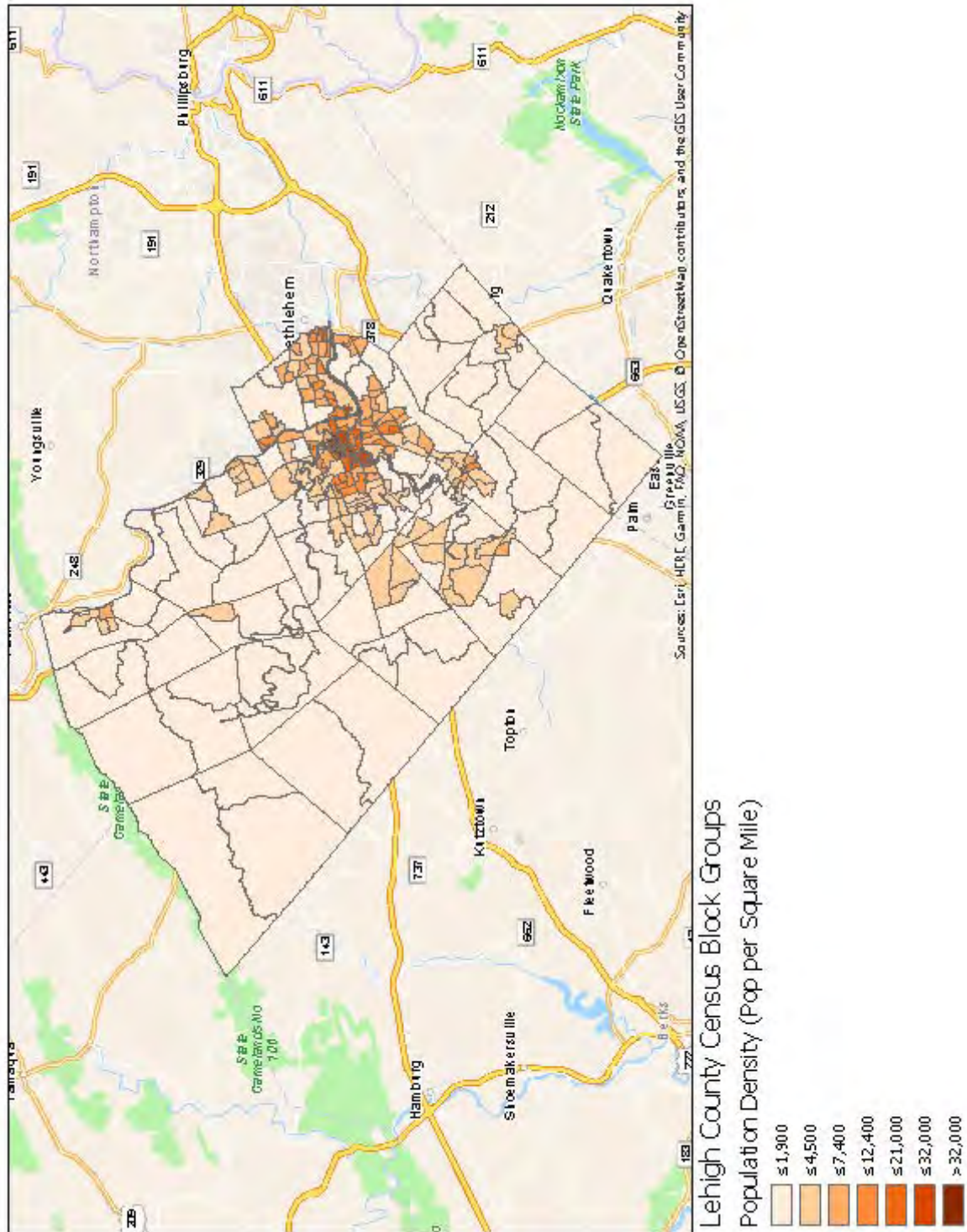
Residents Age 65+ by Block Group



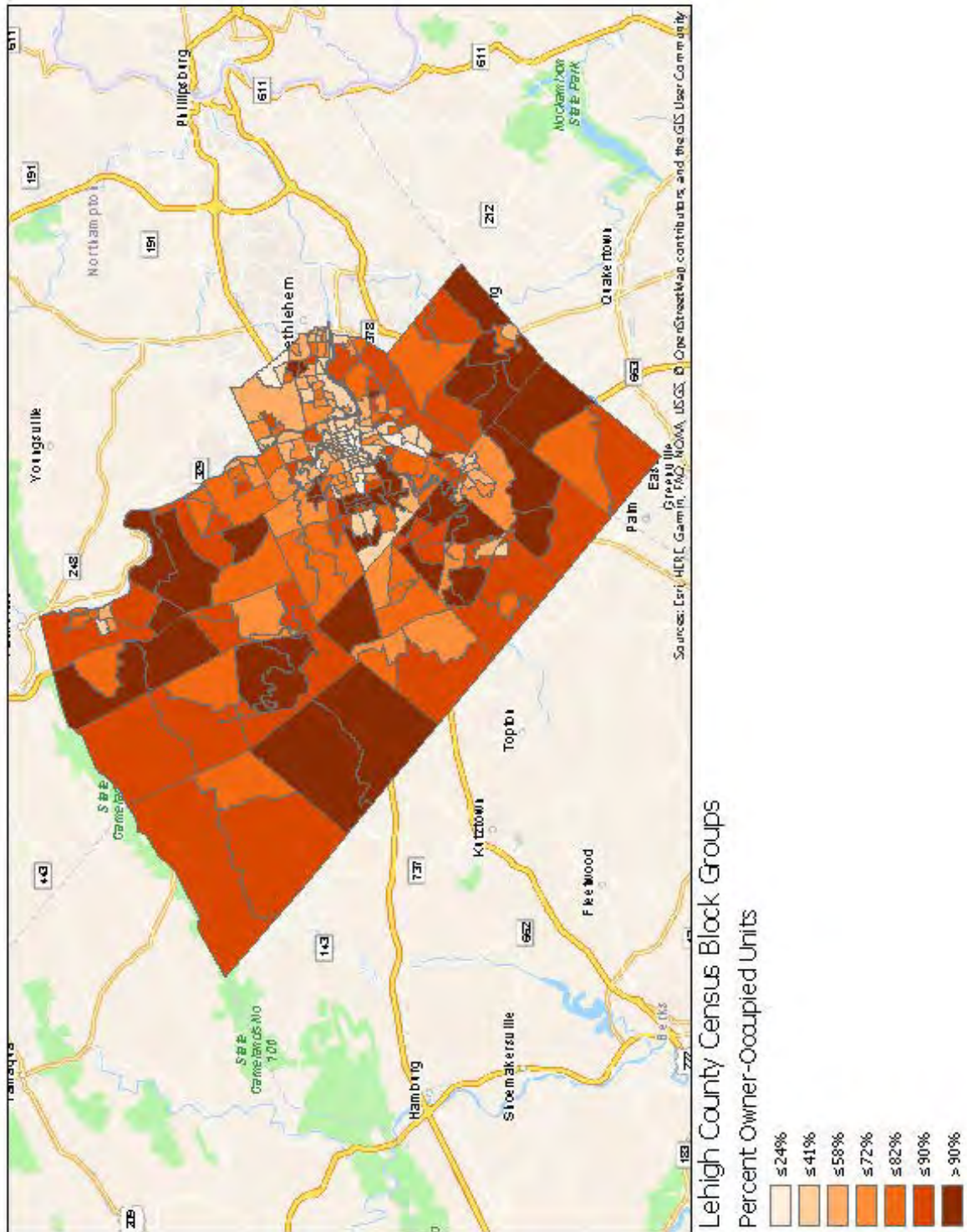
Housing Units by Block Group



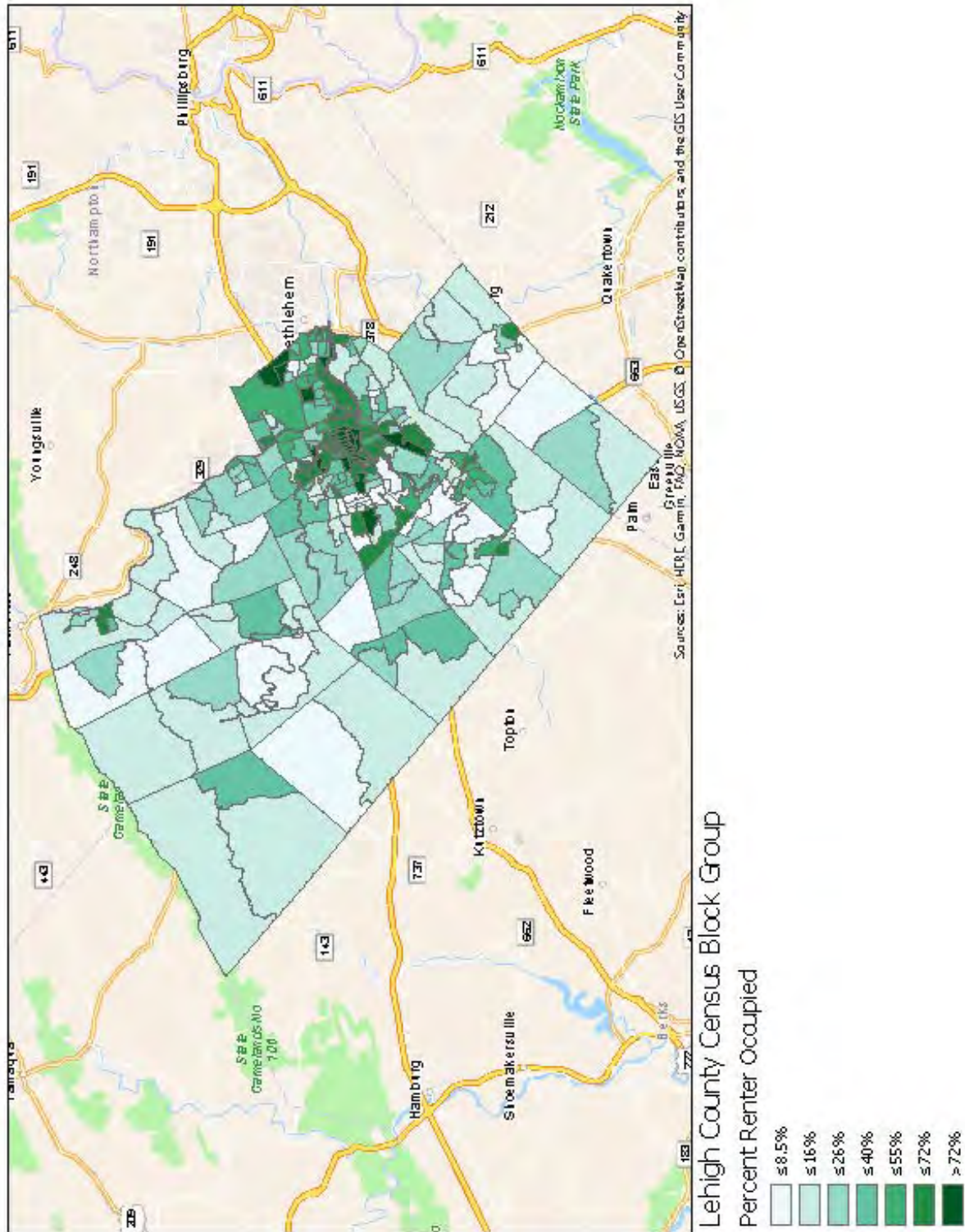
Population Density by Block Group



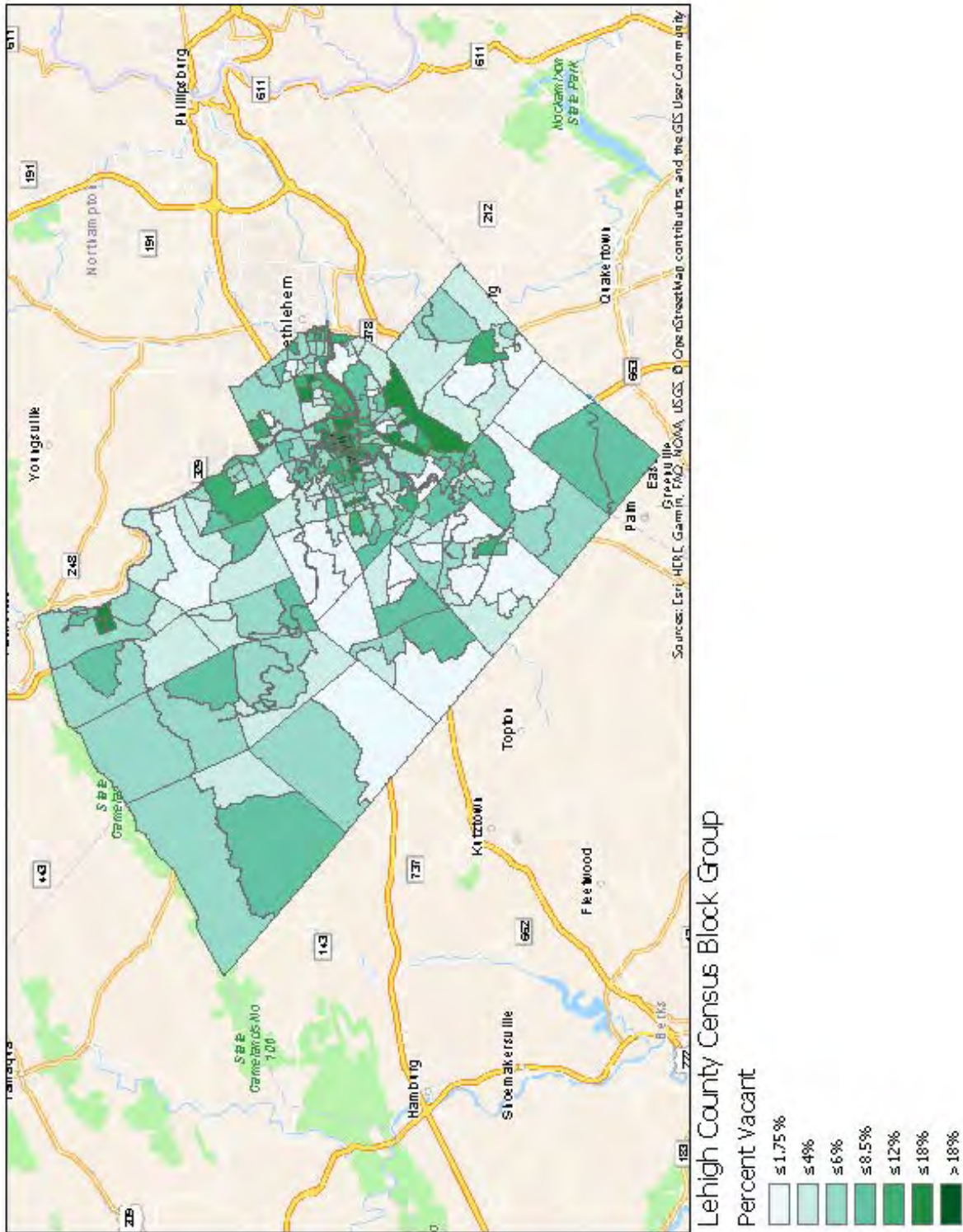
Percent Owner-Occupied Housing Units by Block Group



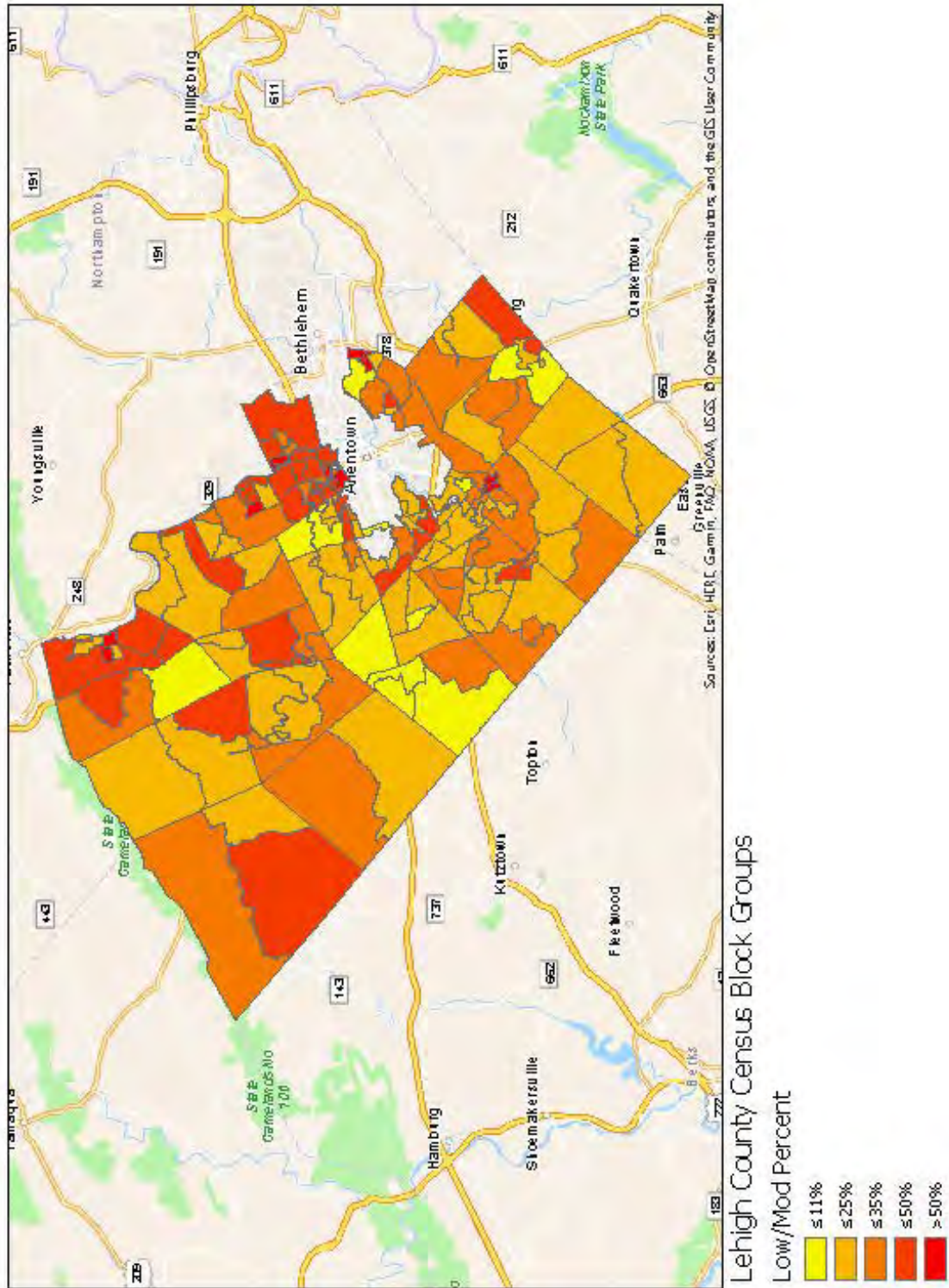
Percent Renter-Occupied Housing Units by Block Group



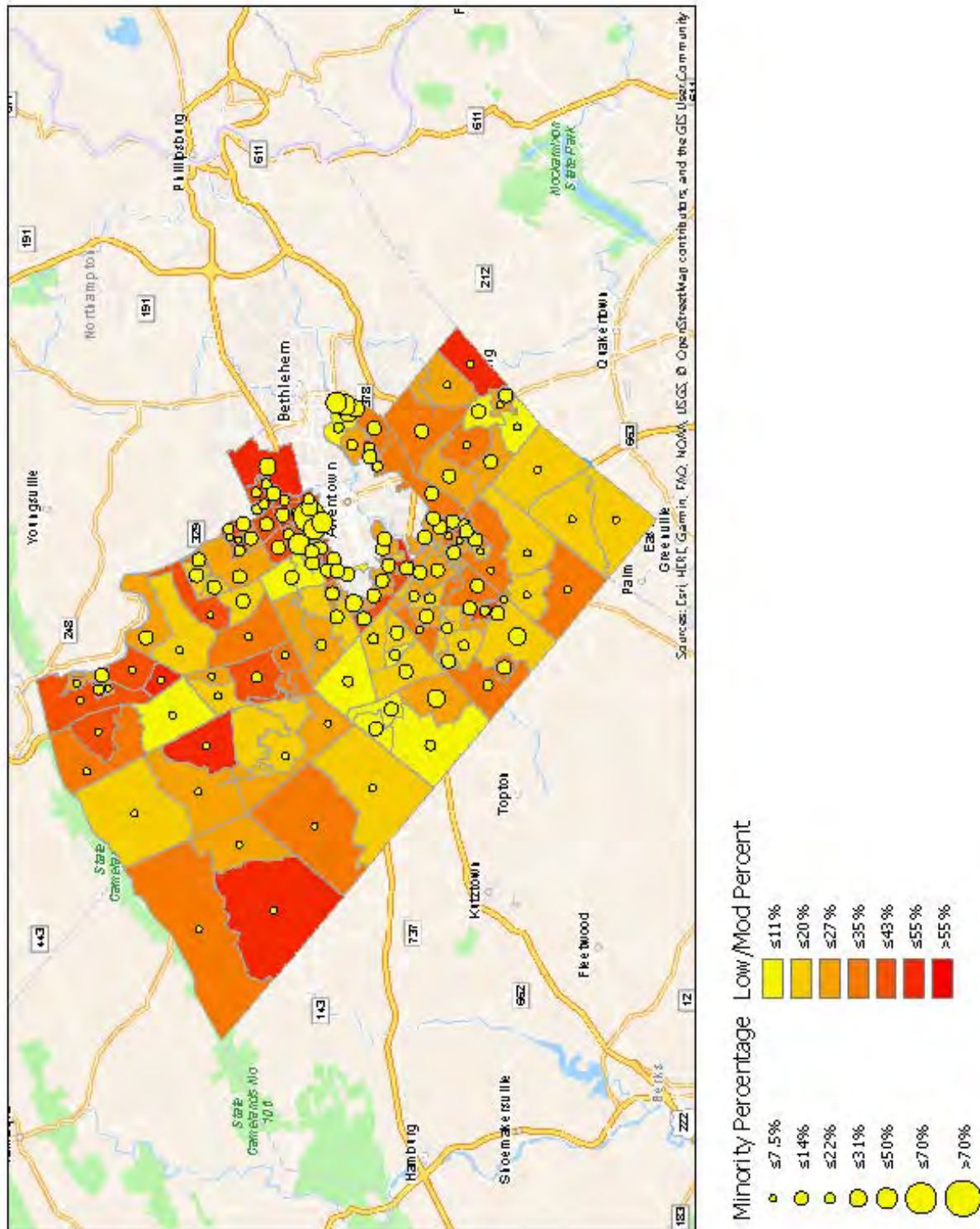
Percent Vacant Housing Units by Block Group



Low/Moderate Income Percentage by Block Group



Low/Moderate Income Percentage by Block Group with Minority Population Overlay



2. Summarize the objectives and outcomes identified in the Plan

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

The goal of Lehigh County is to improve the quality of life for County residents by funding improvements to public facilities and infrastructure, providing public services, and by retaining and increasing the supply of affordable housing units for both owner occupants and renters. During the FY 2023 CDBG and HOME Program Year, the County proposes to address 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 in supporting 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.

3. Evaluation of past performance

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

Lehigh County has a good performance record with HUD and regularly meets its established performance standards. Each year the County prepares a Consolidated Annual Performance and Evaluation Report (CAPER). This report is submitted to HUD within ninety (90) days after the start of the next program year. Copies of the FY 2021 CAPER are available for review at the Lehigh County Department of Community and Economic Development Offices and also on the County website. The FY 2021 CAPER, which was the third CAPER for the FY 2019-2023 Five Year Consolidated Plan, was submitted and approved by HUD. In the FY 2021 CAPER, Lehigh County expended 100% of its CDBG funds to benefit low- and moderate-income persons. The County expended/obligated 10.15% of its funds during the FY 2021 CAPER period on public services, which is below the statutory maximum of 15%. The County expended/obligated 16.50% of its funds during this CAPER period on Planning and Administration, which is below the 20% regulatory cap. As of December 2, 2022, Lehigh County was over the required 1.5 maximum drawdown ratio with a ratio of 1.52.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

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

Each item of the plan primarily benefits the low- and moderate-income population in Lehigh County. Lehigh County has an approved Citizen Participation Plan, as required by HUD, which is on file with HUD and at the Lehigh County Department of Community and Economic Development. The County abided by its Citizen Participation Plan in the preparation and development of the FY 2023 Annual Action Plan.

The first step of the planning process for the FY 2023 Annual Action Plan started with the distribution of applications for CDBG and HOME funds. On Monday, March 6, 2023, the Department of Community and Economic Development distributed the FY 2023 Requests for Funding to local municipalities and non-profit agencies/organizations. These were due back to the County on Monday, April 17, 2023. Information was also available on the Lehigh County Department of Community and Economic Development's website.

The County held two (2) public hearings to obtain resident input on the needs of Lehigh County. The needs public hearing notice was published on Saturday, March 11, 2023 in "The Morning Call," and the needs public hearing notice was posted on the County's website and emails were sent to local municipalities and non-profit agencies/organizations. The first needs hearing was held on Thursday, March 23, 2023 at 3:00 PM, and the second needs hearing was held on Tuesday, March 28, 2023 at 10:00 AM. The first needs public hearing was held via Zoom. The second needs public hearing was held at Room 524 located at 17 South Seventh Street, Allentown, PA. At these public hearings, residents had the opportunity to give their input and their thoughts on the housing, community development, and economic development needs in Lehigh County and how the funds should best be spent to benefit low- and moderate-income persons.

The Final Public Hearing Notice was published on Thursday, June 29, 2023. At the Public Hearing, held on Tuesday, July 11, 2023 at 12:00 PM, the residents were given the opportunity to comment on the "draft" version of the FY 2023 Annual Action Plan and which projects/activities would be funded with FY 2023 CDBG and HOME funds.

The FY 2023 Annual Action Plan was on public display beginning June 30, 2023 through July 30, 2023 at the following locations in the County and on the County's website (<http://www.lehighcounty.org/>):

- **Lehigh County Department of Community and Economic Development** - Lehigh County Government Center, 17 South 7th Street, Allentown, PA 18101
- **Catasauqua Public Library** - 302 Bridge Street, Catasauqua, PA 18032
- **Coplay Library** - 49 South 5th Street, Coplay, PA 18037
- **Emmaus Public Library** - 11 East Main Street, Emmaus, PA 18049
- **Lower Macungie Library** - 3400 Brookside Road, Macungie, PA 18062
- **Parkland Community Library** - 4422 Walbert Avenue, Allentown, PA 18104
- **Slatington Library** - 650 Main Street, Slatington, PA 18080
- **Southern Lehigh Public Library** - 3200 Preston Lane, Center Valley, PA 18034
- **Whitehall Township Public Library** - 3700 Mechanicsville Road, Whitehall, PA 18052
- **The Lehigh County website** - <http://www.lehighcounty.org/Departments/Community-Economic-Development>

The following schedule was used in the preparation of the FY 2023 Action Plan:

- **Applications to request CDBG funds were made available** - March 6, 2023
- **Published the Needs Public Hearing Notice** - March 11, 2023
- **First Needs Public Hearing** - March 23, 2023
- **Second Needs Public Hearing** - March 28, 2023
- **Funding Requests due to Lehigh County** - April 17, 2023
- **Published the Final Public Hearing Notice** - June 29, 2023
- **FY 2023 Annual Action Plan on display; begin 30-day public comment period** - June 30, 2023

- **Final Public Hearing** - July 11, 2023
- **End 30-day public comment period** - July 31, 2023
- **Submission of Annual Plan to HUD** - On or before August 15, 2023
- **Program Year Begins** - October 1, 2023

5. Summary of public comments

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

Lehigh County recorded public comments at the two (2) public hearings on the needs of the County.

- **Thursday, March 23, 2023** – No participants attended this meeting. A meeting summary can be found in the Appendices.
- **Tuesday, March 28, 2023** - There were twenty-six (26) participants and three (3) Lehigh County DCED staff members at the public needs hearing. A meeting summary can be found in the Appendices. All comments were accepted.

The Final public hearing on the Draft version of the FY 2023 Annual Action Plan was held on Tuesday, July 11, 2023. There were no participants and one (1) Lehigh County DCED staff member. A meeting summary can be found in the Appendices. All comments were accepted.

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

All of the previous comments were accepted, and the requests for funding were incorporated into the FY 2023 CDBG Program. Of the eighteen (18) funding applications received for FY 2023, fifteen (15) were funded.

There were three (3) funding applications that were not approved for FY 2023 funds.

One (1) of the projects was not funded due to the proposed project's duplicating the services proposed by another agency. The application for Casa Guadalupe Center's Housing Stabilization Program was not funded because its services duplicate Catholic Charities' Case Management and Rent Assistance program, which is being funded in FY 2023.

One (1) of the projects were not funded due to an incomplete application. The application for Vet Beds was not recommended because the application did not contain a complete line item budget form.

Finally, the last project that was not funded was road reconstruction (Walnut St. - Church to Race St.) as applied for by Slatington Borough. The project was not funded because the street segment is not located in a primarily residential area.

7. Summary

The FY 2023 Annual Action Plan for Lehigh County includes the County's CDBG and HOME Programs and outlines which activities the County will undertake during the program year beginning October 1, 2023, and ending September 30, 2024. This is the County's fifth year of its Five-Year Consolidated Plan.

During the FY 2023 Program Year, Lehigh County, Pennsylvania anticipates the following Federal financial resources:

| | |
|-----------------------|------------------------|
| • FY 2023 CDBG Funds | \$ 1,247,023.00 |
| • CDBG Program Income | \$ 0.00 |
| • FY 2023 HOME Funds | \$ 574,620.00 |
| • Local HOME Match | \$ 0.00 |
| • HOME Program Income | \$ 0.00 |
| Total: | \$ 1,821,643.00 |

During the FY 2023 CDBG and HOME Program Years, Lehigh County proposes to address the following priority need categories from its Five-Year Consolidated Plan:

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

A “draft” of the FY 2023 Annual Action Plan was placed on display at the Lehigh County Government Center and on the County’s website (<http://www.lehighcounty.org/>), which is at the location of the Department of Community and Economic Development offices located at 17 South Seventh Street, Allentown, PA, as well as eight (8) regional libraries for public review. The display period started on Friday, June 30, 2023, through Sunday, July 31, 2023, for a 30-day display period. A Final Public Hearing was held on Tuesday, July 11, 2023, to discuss the proposed activities and solicit citizen comments. Upon completion of the 30-day comment period, Lehigh County will submit the FY 2023 Annual Action Plan to the U.S. Department of Housing and Urban Development Philadelphia Office on or before Tuesday, August 15, 2023.

PR-05 Lead & Responsible Agencies – 91.200(b)**1. Agency/entity responsible for preparing/administering the Consolidated Plan**

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

| Agency Role | Name | Department/Agency |
|--------------------|---------------|--|
| Lead Agency | Lehigh County | Department of Community and Economic Development |
| CDBG Administrator | Lehigh County | Department of Community and Economic Development |

Table 2 – Responsible Agencies

Narrative

The Lehigh County's Department of Community and Economic Development is the administering agency for the CDBG and HOME Programs. The Community and Economic Development Department (DCED) has four (4) full-time staff members, along with a planning consulting firm to assist with the oversight and compliance for the CDBG and HOME programs. The Department of Community and Economic Development prepares the Five Year Consolidated Plan, Annual Action Plans, ERR's, and the Consolidated Annual Performance and Evaluation Reports (CAPER), processes pay requests, and performs contracting and oversight of the programs on a day to day basis. In addition, the planning consulting firm is available to assist the County on an as needed basis.

Consolidated Plan Public Contact Information

Mr. Frank Kane, Director

Lehigh County Department of Community and Economic Development

Lehigh County Government Center

17 South 7th Street, Room 519, Allentown, PA 18101

Phone: (610) 782-3304

Fax: (610) 871-2755

Email: FrankKane@lehighcounty.org

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

AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**1. Introduction**

While preparing the FY 2023 Annual Action Plan, Lehigh County consulted with the Lehigh County Housing Authority, local municipalities, non-profit agencies/organizations, and members of the Eastern Pennsylvania CoC - Lehigh Valley Regional Homeless Advisory Board, which includes the following two (2) counties: Lehigh and Northampton.

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

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

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

Lehigh County works with the following agencies to enhance coordination:

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

A part of the CDBG and HOME application planning process, local agencies, organizations, and municipalities were invited to submit proposals for CDBG and HOME funds for eligible activities.

These groups participate in the planning process by attending the public hearing and submission of funding applications.

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

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

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

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

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

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

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

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

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

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

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

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

| | | |
|-----------|--|---|
| 1. | Agency/Group/Organization | Lehigh County |
| | Agency/Group/Organization Type | Other government – County |
| | What section of the Plan was addressed by Consultation? | Community Development |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Lehigh County Department Heads were contacted to determine the needs for the County. Lehigh County did not receive any applications from any County Department heads. |
| 2. | Agency/Group/Organization | Lehigh County Housing Authority |
| | Agency/Group/Organization Type | Housing PHA Services-Persons with Disabilities Other government - County |
| | What section of the Plan was addressed by Consultation? | Public Housing Needs Non-Homeless Special Needs |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Lehigh County Housing Authority was contacted and presented the housing needs of very low-income persons. |
| 3. | Agency/Group/Organization | North Penn Legal Services |
| | Agency/Group/Organization Type | Housing Services-Education Services-Employment Service-Fair Housing Regional organization |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Non-Homeless Special Needs |

| | | |
|----|---|--|
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | North Penn Legal Services was contacted and submitted a request for continued funding for fair housing activities and legal aid to LMI residents. The County reviewed the application and funded the activity because it met the goals and objectives as outlined in the County's Five Year Consolidated Plan. |
| 4. | Agency/Group/Organization | Lehigh Valley Regional Homeless Advisory Board (LV-RHAB) |
| | Agency/Group/Organization Type | Housing Services-homeless Service-Fair Housing Regional organization |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Lehigh Valley Regional Housing Advisory Board was contacted to determine the needs of the homeless in Lehigh County. The County is a member of the Board and is part of the ongoing discussions on how to assist the homeless. |
| 5. | Agency/Group/Organization | Lehigh Valley Planning Commission |
| | Agency/Group/Organization Type | Regional organization Planning organization |
| | What section of the Plan was addressed by Consultation? | Market Analysis |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Lehigh Valley Planning Commission was contacted to determine the planning needs in Lehigh County. The County did not receive any comments on the Annual Action Plan. |
| 6. | Agency/Group/Organization | Communities in Schools of the Lehigh Valley |
| | Agency/Group/Organization Type | Services-Children Services-Education Other government - County Regional organization Schools |

| | | |
|----|---|---|
| | What section of the Plan was addressed by Consultation? | Non-Homeless Special Needs Economic Development Anti-poverty Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Communities in Schools was contacted and submitted a request for funding (in collaboration with (LCTI) for case management and assistance for low-income students enrolled in the Lehigh Career and Technical Institute. The County funded the activity in FY 2023. |
| 7. | Agency/Group/Organization | Lehigh Valley Center for Independent Living (LVCIL) |
| | Agency/Group/Organization Type | Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Regional organization |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | LVCIL was contacted and submitted a request for continued funding for housing location assistance. The County reviewed the application and funded the activity because it met the goals and objectives as outlined in the County's Five Year Consolidated Plan. |
| 8. | Agency/Group/Organization | Meals on Wheels |
| | Agency/Group/Organization Type | Services-Elderly Persons Services-Health |
| | What section of the Plan was addressed by Consultation? | Non-Homeless Special Needs Anti-poverty Strategy |

| | | |
|-----|---|---|
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Meals on Wheels provided information on elderly, disabled, and special needs in Lehigh County. Meals on Wheels submitted an application for funding for a meal delivery program and was not funded in FY 2023. |
| 9. | Agency/Group/Organization | Catasauqua Borough |
| | Agency/Group/Organization Type | Other government - Local Community Development |
| | What section of the Plan was addressed by Consultation? | Community Development |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Catasauqua Borough was contacted to determine the needs for the Borough. The Borough submitted two (2) funding requests. The first application was for curb cuts on Walnut and Pine Streets. This was not funded. The second application was for upgrades to fluoride containment equipment and building expansion. This application was not funded in FY 2023. |
| 10. | Agency/Group/Organization | Coplay Borough |
| | Agency/Group/Organization Type | Other government - Local Community Development |
| | What section of the Plan was addressed by Consultation? | Community Development |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Coplay Borough was contacted to determine the needs for the Borough. The Borough submitted a funding request for ADA Door replacement at the Library. This application was not funded with FY 2023 funds. |
| 11. | Agency/Group/Organization | Emmaus Borough |
| | Agency/Group/Organization Type | Other government - Local Community Development |
| | What section of the Plan was addressed by Consultation? | Community Development |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Emmaus Borough was contacted to determine the needs for the Borough. The Borough submitted a funding request for curb cuts. This application was funded with FY 2023 funds. |

| | | |
|-----|---|--|
| 12. | Agency/Group/Organization | Fountain Hill Borough |
| | Agency/Group/Organization Type | Other government - Local Community Development |
| | What section of the Plan was addressed by Consultation? | Community Development |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Fountain Hill Borough was contacted to determine the needs for the Borough. The Borough submitted a funding request for street reconstruction. This application was not funded with FY 2023 funds. |
| 13. | Agency/Group/Organization | Slatington Borough |
| | Agency/Group/Organization Type | Other government - Local Community Development |
| | What section of the Plan was addressed by Consultation? | Community Development |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Slatington Borough was contacted to determine the needs for the Borough. The Borough submitted three (3) funding requests for street reconstruction. Two (2) of the applications were funded with FY 2023 funds. The third application was not funded because of limited CDBG funds available. |
| 14. | Agency/Group/Organization | Salisbury Township |
| | Agency/Group/Organization Type | Other government - Local Community Development |
| | What section of the Plan was addressed by Consultation? | Community Development |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Salisbury Township was contacted to determine the needs for the Township. The Township submitted one (1) funding requests for sanitary sewer rehabilitation. This application was not funded with FY 2023 funds. |
| 15. | Agency/Group/Organization | Whitehall Township |
| | Agency/Group/Organization Type | Other government - Local Community Development |
| | What section of the Plan was addressed by Consultation? | Community Development |

| | | |
|-----|---|---|
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Whitehall Township was contacted to determine the needs for the Township. The Township submitted a funding request for Mickley-Prydun Farm and curb cuts. These applications were funded with FY 2023 funds. |
| 16. | Agency/Group/Organization | Pennsylvania Department of Health |
| | Agency/Group/Organization Type | Services-Health Health Agency Other government - State |
| | What section of the Plan was addressed by Consultation? | Lead-based Paint Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The County consulted the 2021 Childhood Lead Surveillance Annual Report released by the Pennsylvania Department of Health. The data identified in the Report is incorporated in the Annual Action Plan. |
| 17. | Agency/Group/Organization | Pennsylvania Eastern Continuum of Care Collaborative |
| | Agency/Group/Organization Type | Housing Services - Housing Publicly Funded Institution/System of Care Correctional Institutions |
| | What section of the Plan was addressed by Consultation? | Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Anti-poverty Strategy |
| | How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | Was contacted to discuss the homeless needs in the County. |
| 18. | Agency/Group/Organization | USDA Rural Utilities |
| | Agency/Group/Organization Type | Broadband Service Provider |
| | What section of the Plan was addressed by Consultation? | Broadband Access Plan |

| | | |
|-----|---|---|
| | How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | Was contacted to discuss the broadband access needs in the County. |
| 19. | Agency/Group/Organization | Verizon |
| | Agency/Group/Organization Type | Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Business Leaders |
| | What section of the Plan was addressed by Consultation? | Anti-poverty Strategy Other - Community Development Strategy |
| | How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | Verizon internet plans were examined to see the services they offer for County residents. |
| 20. | Agency/Group/Organization | Viasat |
| | Agency/Group/Organization Type | Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Business Leaders |
| | What section of the Plan was addressed by Consultation? | Anti-poverty Strategy Other - Community Development Strategy |
| | How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | Viasat internet plans were examined to see the services they offer for County residents. |
| 21. | Agency/Group/Organization | Aspire To Autonomy |
| | Agency/Group/Organization Type | Services-Victims of Domestic Violence Services - Victims |
| | What section of the Plan was addressed by Consultation? | Homeless Needs - Families with children Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy Community Development Strategy |

| | | |
|-----|---|--|
| | How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | Aspire to Autonomy was contacted and submitted a request for funding for operating costs for shelter for single, female victims of human trafficking. The County reviewed the application and funded the activity because it met the goals and objectives as outlined in the County's Five-Year Consolidated Plan. |
| 22. | Agency/Group/Organization | Manito Life Center |
| | Agency/Group/Organization Type | Services-Children Services-Education |
| | What section of the Plan was addressed by Consultation? | Non-Homeless Special Needs Anti-poverty Strategy Community Development Strategy |
| | How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | Manito Life Center was contacted and submitted a request for funding to provide once a week counseling sessions for 10 weeks, to 13 adolescents having a history of stress, anxiety, eating disorders, suicidal tendencies, and are at risk of violent behaviors through LVHN. |
| 23. | Agency/Group/Organization | Big Brothers Big Sisters |
| | Agency/Group/Organization Type | Services-Children Mentoring |
| | What section of the Plan was addressed by Consultation? | Anti-poverty Strategy Community Development Strategy |
| | How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | Big Brothers-Big Sisters was contacted and submitted a request for funding to provide a Sports Buddies Mentoring Program, matching youth aged 7-15 with mentors to build a friendship through the shared interest of sports. |
| 24. | Agency/Group/Organization | Catholic Charities |
| | Agency/Group/Organization Type | Housing Services - Housing Services-Children Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services - Victims Publicly Funded Institution/System of Care |

| | | |
|-----|--|--|
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy |
| | How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | Catholic Charities contacted to discuss the homeless needs in the County. |
| 25. | Agency/Group/Organization | Valley Housing Development Corporation |
| | Agency/Group/Organization Type | Housing Services - Housing Regional organization Business and Civic Leaders |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Market Analysis Anti-poverty Strategy |
| | How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | VHDC was contacted and submitted an application to develop 4 affordable rental units. . The County reviewed the application and funded the activity because it met the goals and objectives as outlined in the County's Five-Year Consolidated Plan. |

Table 3 – Agencies, groups, organizations who participated

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

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

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

| Name of Plan | Lead Organization | How do the goals of your Strategic Plan overlap with the goals of each plan? |
|---|--|---|
| CoC Consolidated Application | Lehigh Valley Regional Homeless Advisory Board | They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans. |
| Annual and Five Year Capital Plans | Lehigh County Housing Authority | Lehigh County Housing Authority is the lead agency providing public housing assistance in Lehigh County. The goals of the County and the Housing Authority are complementary. |
| Lehigh County Emergency Management Plan | Lehigh County Emergency Management | They are incorporated in the Five-Year Consolidated Plan and the Annual Action Plans. |
| 2021 Childhood Lead Surveillance Annual Report | PA Department of Health | They are incorporated in the Five-Year Consolidated Plan and the Annual Action Plans. |
| Pennsylvania Broadband Initiative | PA Department of Community and Economic Development | They are incorporated in the Five-Year Consolidated Plan and the Annual Action Plans. |
| Livable Landscapes – Lehigh County Open Space Plan | Lehigh Valley Planning Commission | They are incorporated in the Five-Year Consolidated Plan and the Annual Action Plans. |
| Analysis of Impediments to Fair Housing Choice | Lehigh County Department of Community and Economic Development | They are incorporated in the Five-Year Consolidated Plan and the Annual Action Plans. |

Table 4 – Other local / regional / federal planning efforts**Narrative (optional)**

Lehigh County consulted and coordinated with various agencies and organizations on both a county-wide and state-wide basis. The culmination of these efforts has resulted in the development of the County's FY 2023 Annual Action Plan.

The Lehigh County Department of Community and Economic Development (DCED) is the administrating agency for the CDBG and HOME programs. Close coordination is maintained with other County departments, as well as regional organizations such as the Community Action Committee of the Lehigh Valley, Discover Lehigh Valley, Greater Lehigh Valley Chamber of Commerce, Lehigh County Industrial Development Authority, Lehigh Valley Economic Development Corporation, Lehigh Valley Industrial Park,

Inc., Lehigh Valley Planning Commission, and the Eastern PA Continuum of Care. Lehigh County Department of Community and Economic Development coordinated with each municipality in Lehigh County as well as various non-profit organizations, such as New Bethany Ministries, Lehigh Valley Community Land Trust, Valley Youth House, Community First Fund, Catholic Charities, Communities in Schools of the Lehigh Valley, Lehigh Career & Technical Institute, Lehigh Valley Center for Independent Living, Meals on Wheels, North Penn Legal Services, Aspire To Autonomy, Manito Life Center, Parkland CARES, CALV, Lehigh Carbon Community College, and the Literacy Center. These agencies and others helped aid the planning process. Lehigh County DCED works closely with the Lehigh County Commissioners and County staff to address projects and activities that extend beyond the County limits. The County and the regional agencies have a good working relationship.

AP-12 Participation – 91.105, 91.200(c)**1. Summary of citizen participation process/Efforts made to broaden citizen participation
Summarize citizen participation process and how it impacted goal-setting**

The Annual Action Plan is made up of multiple components, which include: funding applications from municipalities, social service agencies, and housing organizations; citizen participation comments; and the development of the Annual Action Plan. Each item of the plan primarily benefits the low- and moderate-income population in Lehigh County. Lehigh County has an approved Citizen Participation Plan, as required by HUD, which is on file with HUD and at the Lehigh County Department of Community and Economic Development. The County abided by its Citizen Participation Plan in the preparation and development of the FY 2023 Annual Action Plan.

The FY 2023 Annual Action Plan planning process started with the distribution of applications for CDBG and HOME funds. On Monday, March 6, 2023, the Department of Community and Economic Development distributed the FY 2023 CDBG Requests for Funding to local municipalities and non-profit agencies/organizations. These were due back to the County on Monday, April 17, 2023. Information was also available on the Lehigh County Department of Community and Economic Development's website.

The County held two (2) needs public hearings to obtain resident input on the needs of Lehigh County. The needs public hearing notice was published on Saturday, March 11, 2023 and was posted on the County's website and emails were sent to local municipalities and non-profit agencies/organizations. At these public hearings, residents had the opportunity to give their input and their thoughts on the housing, community development, and economic development needs in Lehigh County and how the CDBG funds should best be spent to benefit low- and moderate-income persons. The Final Public Hearing Notice was published on Thursday, June 29, 2023, and held on Tuesday, July 11, 2023 at 12:00 PM, the residents were given the opportunity to comment on the "draft" version of the FY 2023 Annual Action Plan and which projects/activities would be funded with FY 2023 CDBG and HOME funds.

The FY 2023 Annual Action Plan was on public display June 30, 2023 through July 30, 2023 at the Lehigh County Department of Community and Economic Development, Lehigh County Government Center, 17 South 7th Street, Allentown, PA 18101, at all of the area libraries located in the County, and on the County's website (<http://www.lehighcounty.org/>).

Citizen Participation Outreach

| Sort Order | Mode of Outreach | Target of Outreach | Summary of Response/Attendance | Summary of comments received | Summary of comments not accepted & reasons | URL (if applicable) |
|------------|--------------------|---|--|--|--|---|
| 1. | Newspaper Ad #1 | Minorities Persons with disabilities Non-targeted / broad community Residents of Public and Assisted Housing Agencies / Organizations | The needs public hearing notice for both hearings was published on Saturday, March 11, 2023 in The Morning Call, and the needs public hearing notice was posted on the County's website and emails were sent to local municipalities and non-profit agencies/organizations. The second public hearing notice was published on Thursday, June 29, 2023 in The Morning Call. | The proof of publication for the ads are included in the Citizen Participation Appendix of the Annual Action Plan. | None. | Not Applicable. |
| 2. | Public Meetings #1 | Minorities Persons with disabilities Non-targeted / broad community Residents of Public and Assisted Housing Agencies / Organizations | The first needs hearing was held on Thursday, March 23, 2023, the second needs hearing was held on Tuesday, March 28, 2023. See public hearing comments and the sign-in sheets in the summaries. | See public hearing summaries in the Citizen Participation section of the Plan. | None. | http://www.lehighcounty.org |

| Sort Order | Mode of Outreach | Target of Outreach | Summary of Response/Attendance | Summary of comments received | Summary of comments not accepted & reasons | URL (If applicable) |
|------------|-------------------|---|---|--|--|---|
| 3. | Internet Outreach | Non-targeted / broad community | None. | None. | None. | http://www.lehighcounty.org |
| 4. | Email Blast | Minorities Persons with disabilities Non-targeted / broad community Residents of Public and Assisted Housing Agencies / Organizations | The email blast was sent out on March 9, 2023 to the distribution list. Municipalities and agencies/organizations submitted applications for funding and provided comments at the public hearings. | Of the fifteen (15) funding applications received in FY 2023, thirteen (13) were funded. Lehigh County needs were addressed through the funded projects. | None. | Not Applicable. |
| 5. | Newspaper Ad #2 | Minorities Persons with disabilities Non-targeted / broad community Residents of Public and Assisted Housing | The final public hearing notice was published in The Morning Call on Friday, June 30, 2023. This ad was published to inform the public that the Draft FY 2023 Annual Action Plan was on display and a second public hearing to solicit comments would be held on July 11, 2023. | The proof of publication for the ads are included in the Citizen Participation Appendix of the Annual Action Plan. | None. | Not Applicable. |

| Sort Order | Mode of Outreach | Target of Outreach | Summary of Response/Attendance | Summary of comments received | Summary of comments not accepted & reasons | URL (If applicable) |
|------------|-------------------|---|---|--|--|---|
| | | Agencies / Organizations | | | | |
| 6. | Public Meeting #2 | Minorities Persons with disabilities Non-targeted / broad community Residents of Public and Assisted Housing Agencies / Organizations | The final public hearing to solicit comments on the FY 2023 budget and draft FY 2023 Annual Action Plan was held on July 11, 2023. See public hearing comments and the sign-in sheets in the summaries. | See public hearing summaries in the Citizen Participation section of the Plan. | None. | http://www.lehighcounty.org |

Table 5 – Citizen Participation Outreach

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

Lehigh County will receive \$1,247,023 in CDBG funds and \$574,620 in HOME funds for the FY 2023 program year. The program year is October 1, 2023 through September 30, 2024. These funds will be used to address the following strategies: Housing Strategy, Homeless Strategy, Community Development Strategy, and Administration, Planning, and Management Strategy. The accomplishments of these projects/activities will be reported in the FY 2023 Consolidated Annual Performance and Evaluation Report (CAPER).

Priority Table

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 7 | | | | Expected Amount Available Reminder of Con Plan \$ | Narrative Description |
|-------------|------------------|--|----------------------------------|-----------------------|-----------------------------|------------------|---|---|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| CDBG | public - federal | Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services | 1,247,023 | 0 | 0 | 1,247,023 | 91,868 | A total of 14 projects/activities were funded based on the CDBG allocations |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 7 | | | | Expected Amount Available Reminder of Con Plan \$ | Narrative Description |
|-------------|------------------|---|----------------------------------|-----------------------|-----------------------------|----------------|---|---|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| HOME | public - federal | Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA | 574,620 | 0 | 0 | 574,620 | 0 | 4 projects/activities were funded based on FY 2023 HOME allocation. |

Table 6 - Expected Resources – Priority Table

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

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

- Lehigh County Affordable Housing Trust Funds (AHTF)** - The Pennsylvania Optional County Affordable Housing Trust Funds Act of 1992 (Act 137), allows counties to raise revenues for affordable housing efforts by increasing the fees charged by the Recorder of Deeds Office for recording deeds and mortgages. The County raised the fee from \$13 to \$26 per document. Affordable Housing Trust Funds revenue is used to fund affordable housing initiatives and up to 15 percent may be used for the administrative costs to implement the initiatives. Eligible activities include using the revenues as the local matching funds to secure Federal and State Funds, construction or rehabilitation financing, housing related services, match for other State or Federal funds, and supporting first-time homebuyer second mortgage programs. The current balance of the AHTF is \$878,250.

- **Continuum of Care Grant** - Lehigh County is part of the Lehigh Valley Regional Housing Advisory Board. This is a two (2) county region that applies for Continuum of Care funds each year. In FY 2022 CoC funds, Lehigh Valley received funding for twelve (12) projects totaling \$3,999,447 for support services and permanent supportive housing projects throughout the region. HUD will contract with these agencies during the FY 2023 program year.
- **The Lehigh County Housing Authority** - Expects to receive \$650,457 in FY 2023 funds from the Public Housing Capital Fund Program, as well as \$566,648 in Public Housing Operating funds, and \$11,299,229 in Section 8 Housing Choice Voucher assistance.
- **Emergency Solutions Grant-CV (ESG-CV) Funds** - Lehigh County received \$305,004 in ESG-CV # 1 and \$359,504 in ESG-CV # 2 from PA-DCED. Lehigh County has only \$27,994.63 in ESG-CV # 1 funds remaining and \$63,395.25 in ESG-CV # 2 funds remaining.
- Other federal funds that may be used in support of housing, community development, and economic development during FY 2023 include loans through HUD's Section 108 Loan Program, Brownfields Economic Development Initiative (BEDI) grants, and HUD Supportive Housing Programs.

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

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

Discussion

Lehigh County is a member of the Eastern Pennsylvania Continuum of Care Network, PA-509 Continuum of Care, administered by the Lehigh Valley Regional Homeless Advisory Board (RHAB). The Lehigh Valley RHAB covers two (2) counties in the region. These counties include Lehigh and Northampton. The following agencies in Lehigh County received FY 2022 CoC funds:

- **Lehigh County Housing Authority - LCHA S+C 2022** - received \$241,210 for permanent supportive housing.
- **New Bethany Inc. - New Bethany Rapid Rehousing** - received \$135,597 for rapid re-housing.
- **Resources for Human Development, Inc. - LV ACT Housing Supports** - received \$229,840 for permanent supportive housing.
- **Lehigh County Conference of Churches - Outreach and Care Management for the Disabled, Chronically Homeless** - received \$71,545 for supportive services.

- **Lehigh County Conference of Churches - Pathways Permanent Supportive Housing Consolidation** - received \$1,071,356 for permanent supportive housing.
- **Lehigh County Conference of Churches - Pathways Permanent Supportive Housing Consolidation Expansion** - received \$26,014 for permanent supportive housing.
- **Lehigh County Conference of Churches - Pathways RRH** - received \$390,252 for rapid re-housing.
- **The Salvation Army, a New York Corporation - Allentown Hospitality House Permanent Housing Program** - received \$184,502 for permanent supportive housing.
- **Third Street Alliance for Women & Children - Lehigh Valley Rapid Re-Housing Program** - received \$387,700 for rapid re-housing.
- **Valley Housing Development Corporation - VHDC SHP #2/3 2022** - received \$403,265 for permanent supportive housing.
- **Valley Youth House Committee, Inc. - Lehigh Valley RRH for families** - received \$322,472 for rapid re-housing.
- **Valley Youth House Committee, Inc. - TH-RRH for Lehigh Valley Youth** - received \$535,694 for temporary and rapid re-housing.

In Lehigh County, there is a network of provider agencies that address the shelter and transitional housing needs of persons who are homeless. The shelter and transitional housing in Lehigh County include:

- 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)

AP-20 Annual Goals and Objectives

Goals Summary Information

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|------------|------------------------------|------------|----------|--------------------|-----------------|------------------|-----------------|---|
| 1. | HSS-1 Home Ownership | 2019 | 2023 | Affordable Housing | County Wide | Housing Priority | HOME: \$0 | Homeowner Housing Added: 0 Household Housing Unit |
| 2. | HSS-2 Mixed Income Housing | 2019 | 2023 | Affordable Housing | County Wide | Housing Priority | HOME: \$0 | Homeowner Housing Added: 0 Household Housing Unit |
| 3. | HSS-3 Housing Rehabilitation | 2019 | 2023 | Affordable Housing | County Wide | Housing Priority | HOME: \$0 | Homeowner Housing Rehabilitated: 0 Household Housing Unit |
| 4. | HSS-4 Housing Construction | 2019 | 2023 | Affordable Housing | County Wide | Housing Priority | HOME: \$517,158 | Rental units constructed: 6 Household Housing Unit Homeowner Housing Added: 0 Household Housing Unit |

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|------------|----------------------------|------------|----------|-----------------------------------|-----------------|--------------------------------|--------------------|---|
| 5. | HSS-6 Fair Housing | 2019 | 2023 | Affordable Housing | County Wide | Housing Priority | CDBG: \$12,000 | Public service activities for Low/Moderate Income Housing Benefit: 40 Households Assisted Other: 1 Other |
| 6. | HOM-1 Housing | 2019 | 2023 | Homeless | County Wide | Homeless Priority | CDBG: \$25,000 | Homeless Person Overnight Shelter: 16 Persons Assisted |
| 7. | SNS-2 Social Services | 2019 | 2023 | Non-Homeless Special Needs | County Wide | Other Special Needs Priority | CDBG: \$25,000 | Public service activities for Low/Moderate Income Housing Benefit: 25 Persons Assisted |
| 8. | CDS-1 Community Facilities | 2019 | 2023 | Non-Housing Community Development | County Wide | Community Development Priority | CDBG: \$170,490 | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 320 Persons Assisted Other: 1 Other |
| 9. | CDS-2 Infrastructure | 2019 | 2023 | Non-Housing Community Development | County Wide | Community Development Priority | CDBG: \$178,297.81 | Public service activities other than Low/Moderate Income Housing Benefit: 1,090 Persons Assisted |

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|------------|------------------------------|------------|----------|---|-----------------|---|-----------------------------------|--|
| 10. | CDS-3 Public Services | 2019 | 2023 | Non-Housing Community Development | County Wide | Community Development Priority | CDBG: \$99,642 | Public service activities other than Low/Moderate Income Housing Benefit: 58 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 25 households assisted |
| 11. | CDS-4 Accessibility | 2019 | 2023 | Non-Housing Community Development | County Wide | Community Development Priority | CDBG: \$439,549.19 | Public service activities other than Low/Moderate Income Housing Benefit: 4,245 Persons Assisted |
| 12. | CDS-5 Public Safety | 2019 | 2023 | Non-Housing Community Development | County Wide | Community Development Priority | CDBG: \$59,640 | Public service activities other than Low/Moderate Income Housing Benefit: 10,185 Persons Assisted |
| 13. | APM-1 Coordination | 2019 | 2023 | Non-Housing Community Development administrative management | County Wide | Administration, Planning, and Management Priority | CDBG: \$237,404 HOME: \$57,462 | Other: 2 Other |

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|------------|----------------|------------|----------|---|-----------------|---|-----------|------------------------|
| 14. | APM-2 Planning | 2019 | 2023 | Non-Housing Community Development administrative management | County Wide | Administration, Planning, and Management Priority | CDBG: \$0 | Other: 1 Other |

Table 53 – Goals Summary

Goal Descriptions

| | | |
|----|------------------|--|
| 1. | Goal Name | HSS-1 Home Ownership |
| | Goal Description | Promote and assist in developing homeownership opportunities for low- and moderate-income persons & families. |
| 2. | Goal Name | HSS-2 Mixed Income Housing |
| | Goal Description | Promote and assist in the development of mixed income housing, both rental housing and housing for homebuyers. |
| 3. | Goal Name | HSS-3 Housing Rehabilitation |
| | Goal Description | Promote and assist in the preservation of existing owner and renter occupied housing stock in the County. |
| 4. | Goal Name | HSS-4 Housing Construction |
| | Goal Description | Promote and assist in the development of affordable housing, both rental and sales housing. |
| 5. | Goal Name | HSS-6 Fair Housing |
| | Goal Description | Affirmatively further fair housing by promoting fair housing choice throughout Lehigh County. |

| | | |
|-----|------------------|---|
| 6. | Goal Name | HOM-1 Housing |
| | Goal Description | Promote and assist in developing housing opportunities for homeless persons, families, and those who are at-risk of becoming homeless. |
| 7. | Goal Name | HOM-3 Homeless Prevention |
| | Goal Description | Promote and assist in anti-eviction and prevention of unfair housing practices, which may contribute to homelessness. |
| 8. | Goal Name | CDS-1 Community Facilities |
| | Goal Description | Assist in improving parks, recreational centers, trails, libraries, and other public and community facilities throughout the County. |
| 9. | Goal Name | CDS-2 Infrastructure |
| | Goal Description | Assist in improving the public infrastructure through rehabilitation, reconstruction, and new construction. |
| 10. | Goal Name | CDS-3 Public Services |
| | Goal Description | Assist in improving and increasing public safety, municipal services, and public service and human service programs throughout Lehigh County. |
| 11. | Goal Name | CDS-4 Accessibility |
| | Goal Description | Assist in improving the physical and visual accessibility of community facilities, infrastructure, and public buildings throughout the County. |
| 12. | Goal Name | CDS-5 Public Safety |
| | Goal Description | Assist in improving the public safety facilities, equipment, and ability for first responders for emergency situations throughout the County. |
| 13. | Goal Name | APM-1 Coordination |
| | Goal Description | Continue to provide sound and professional planning, program management and oversight for the successful administration of Federal, state, and local funded programs. |

| | | |
|-----|------------------|--|
| 14. | Goal Name | APM-2 Planning |
| | Goal Description | Continue to develop and plan for special studies, environmental clearance, fair housing, and compliance with all Federal, state, and local laws and regulations. |

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b)

Lehigh County proposes to assist the following:

- **Extremely Low-Income** - 0 families
- **Low-Income** - 5 families
- **Moderate-Income** - 1 families

AP-35 Projects – 91.220(d)

Introduction

Listed below are the FY 2023 CDBG and HOME activities for Lehigh County.

| # | Project Name |
|-----|--|
| 1. | Aspire To Autonomy – Emergency Shelter |
| 2. | Communities in Schools of the Lehigh Valley – Career Supports at LCTI |
| 3. | Lehigh Valley Center for Independent Living - People Living in Accessible Community Environments (PLACE) Program |
| 4. | Manito Life Center – Therapeutic Riding for At-Risk Adolescents |
| 5. | Big Brothers Big Sisters – Sports Buddies |
| 6. | Catholic Charities – Case Management and Rent Assistance |
| 7. | North Penn Legal Services – LMI Legal Help |
| 8. | Whitehall Township – Mickley-Prydun Farm |
| 9. | Coplay Borough – Fire Equipment |
| 10. | Emmaus Borough – Curb Cuts |
| 11. | Slatington Borough – North St. Reconstruction |
| 12. | Slatington Borough – 5 th St. Reconstruction |
| 13. | Whitehall Township – Curb Cuts |
| 14. | CDBG Administration |
| 15. | HOME Administration |
| 16. | CHDO Set-Aside |
| 17. | Affordable Housing Project – Valley Housing Development Corporation |
| 18. | Affordable Housing Project |

Table 7 – Project Information

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

Lehigh County has allocated its FY 2023 CDBG funds to principally benefit low- and moderate-income persons.

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

The proposed activities and projects for FY 2023 are located in areas of the County with the highest percentages of low- and moderate-income persons, and those block groups with a higher than average percentage of minority persons. The following census tracts and block groups have at least 51% of the households with low- and moderate-incomes:

- C.T. 1900, B.G. 1 – South Whitehall Township
- C.T. 5100, B.G. 3 – Slatington Borough
- C.T. 5100, B.G. 4 – Slatington Borough
- C.T. 5702, B.G. 2 – Whitehall Township
- C.T. 5702, B.G. 3 – Whitehall Township
- C.T. 5703, B.G. 3 – Whitehall Township
- C.T. 5704, B.G. 1 – Whitehall Township
- C.T. 5800, B.G. 1 – Coplay Borough
- C.T. 5901, B.G. 4 – Catasauqua Borough
- C.T. 5901, B.G. 5 – Catasauqua Borough
- C.T. 6001, B.G. 2 – South Whitehall Township
- C.T. 6101, B.G. 1 – South Whitehall Township
- C.T. 6800, B.G. 1 – Fountain Hill Borough
- C.T. 6800, B.G. 4 – Fountain Hill Borough

Additionally, because Lehigh County is an exception grantee and all Census Tracts where at least 39.01% of households with low- and moderate-incomes are CDBG eligible, the following Census Tracts and Block Groups are eligible:

- C.T. 5100, B.G. 2 – Slatington Borough (47.57% LMI)

- C.T. 5200, B.G. 3 – Washington Township (44.52% LMI)
- C.T. 5601, B.G. 1 – Whitehall Township (43.24% LMI)
- C.T. 5602, B.G. 4 – Whitehall Township (43.41% LMI)
- C.T. 5702, B.G. 1 – Whitehall Township (49.31% LMI)
- C.T. 5704, B.G. 2 – Whitehall Township (43.46% LMI)
- C.T. 5800, B.G. 3 – Coplay Borough (50.39% LMI)
- C.T. 5901, B.G. 3 – Catasauqua Borough (41.35% LMI)
- C.T. 5902, B.G. 1 – Hanover Township (42.22% LMI)
- C.T. 6001, B.G. 3 – South Whitehall Township (44.62% LMI)
- C.T. 6001, B.G. 5 – South Whitehall Township (41.46% LMI)
- C.T. 6101, B.G. 3 – South Whitehall Township (46.80% LMI)
- C.T. 6202, B.G. 2 – Upper Macungie Township (44.80% LMI)
- C.T. 6202, B.G. 3 – Upper Macungie Township (40.70% LMI)
- C.T. 6303, B.G. 3 – Macungie Borough (40.51% LMI)
- C.T. 6500, B.G. 2 – Emmaus Borough (50.00% LMI)
- C.T. 6500, B.G. 3 – Emmaus Borough (47.89% LMI)
- C.T. 6701, B.G. 2 – Salisbury Township (40.12% LMI)
- C.T. 6702, B.G. 2 – Salisbury Township (39.01% LMI)
- C.T. 6703, B.G. 3 – Salisbury Township (43.81% LMI)
- C.T. 6902, B.G. 2 – Coopersburg Borough & Upper Saucon Township (43.95% LMI)

The HOME funds will be used for administration and for housing projects/activities. These funds will be 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 by geographic area.

Lehigh County does not anticipate any obstacles in the performance of the FY 2023 CDBG activities. 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 will use these additional funds to help assist with the need for affordable housing. The primary obstacle to meeting the underserved needs are the limited resources available to address the identified priorities in the County. Lehigh County will continue to partner with other agencies when feasible, to leverage resources and maximize outcomes in housing, community, and economic development.

AP-38 Projects Summary**Project Summary Information**

| | | |
|----|--|---|
| 1. | Project Name | Aspire To Autonomy – Emergency Shelter |
| | Target Area | County Wide |
| | Goals Supported | HOM-1 Housing |
| | Needs Addressed | Homeless Strategy |
| | Funding | CDBG: \$25,000.00 |
| | Description | Operating costs for shelter for single, female victims of human trafficking. The funds will cover program expenses such as salaries/payroll expenses including taxes for a one-year period beginning October 1, 2023, through September 30, 2024. |
| | Target Date | 9/30/2024 |
| | Estimate the number and type of families that will benefit from the proposed activities | 16 persons will benefit from the activity. |
| | Location Description | Fountain Hill, Pennsylvania |
| | Planned Activities | The Matrix Code is 03T, Operating Costs of Homeless Services (Public Services). The National Objective is Low/Mod Limited Clientele. |
| 2. | Project Name | Communities in Schools of the Lehigh Valley – Career Supports at LCTI |
| | Target Area | County Wide |
| | Goals Supported | CDS-3 Public Services |
| | Needs Addressed | Community Development Strategy |
| | Funding | CDBG: \$25,000.00 |

| | | |
|-----------|--|---|
| | Description | Case management for 20 low-income, at-risk students who require truancy interventions and additional case-management support to overcome mental and behavioral health challenges and successfully complete their academic goals at LCTI. |
| | Target Date | 9/30/2024 |
| | Estimate the number and type of families that will benefit from the proposed activities | An estimated 20 youth will benefit from the activity. |
| | Location Description | Various locations within Lehigh County. |
| | Planned Activities | The project matrix code is 05D, Youth Services. The National Objective is Low/Mod Clientele (LMC). |
| 3. | Project Name | Lehigh Valley Center for Independent Living - People Living in Accessible Community Environments (PLACE) Program |
| | Target Area | County Wide |
| | Goals Supported | SNS-2 Social Services |
| | Needs Addressed | Special Needs Strategy |
| | Funding | CDBG: \$25,000.00 |
| | Description | The program will provide 25 County households with housing options and connect consumers to community services they need to achieve or maintain their independence. Staff will also provide education for private landlords, property managers, and realtors on the benefits of renting to persons with disabilities. |
| | Target Date | 9/30/2024 |
| | Estimate the number and type of families that will benefit from the proposed activities | 25 Households |
| | Location Description | 17 N. 13 th St., Allentown, PA 18102 |

| | | |
|----|--|--|
| | Planned Activities | The Matrix Code is 05B, Handicapped Services (Public Services). The National Objective is Low/Mod Limited Clientele. |
| 4. | Project Name | Manito Life Center - Therapeutic Riding for At-Risk Adolescents |
| | Target Area | County Wide |
| | Goals Supported | CDS-3 Public Services |
| | Needs Addressed | Community Development Strategy |
| | Funding | CDBG: \$25,000.00 |
| | Description | CDBG funds will be used to provide once a week counseling sessions for 10 weeks, to 13 adolescents having a history of stress, anxiety, eating disorders, suicidal tendencies, and are at risk of violent behaviors. Pilot program through LVHN. |
| | Target Date | 9/30/2024 |
| | Estimate the number and type of families that will benefit from the proposed activities | 13 adolescents will benefit from the activity. |
| | Location Description | 2160 N. Cedar Crest Blvd. Allentown, PA 18104 |
| | Planned Activities | The Matrix Code is 05D, Youth Services. The National Objective is Low/Mod Clientele (LMC). |
| 5. | Project Name | Big Brothers Big Sisters – Sports Buddies |
| | Target Area | County Wide |
| | Goals Supported | CDS-3 Public Services |
| | Needs Addressed | Community Development Strategy |
| | Funding | CDBG: \$20,422.00 |
| | Description | CDBG funds will be used to implement Sports Buddies Mentoring Program, matching youth aged 7-15 with mentors in one-to-one mentoring relationships where they can build a friendship through the shared interest of sports. |

| | | |
|-----------|--|---|
| | Target Date | 9/30/2024 |
| | Estimate the number and type of families that will benefit from the proposed activities | 25 individuals will benefit from the proposed activities. |
| | Location Description | 41 S. Carlisle St. Allentown, PA 18109 |
| | Planned Activities | The Matrix Code is 05D, Youth Services. The National Objective is Low/Mod Clientele (LMC). |
| 6. | Project Name | Catholic Charities – Case Management and Rent Assistance |
| | Target Area | County Wide |
| | Goals Supported | CDS-3 Public Services |
| | Needs Addressed | Community Development Strategy |
| | Funding | CDBG: \$29,220.00 |
| | Description | CDBG funds will be used to assist vulnerable Lehigh County households with direct and immediate assistance to preserve their housing. This activity will provide case management, rent, utility, security, and mortgage assistance for approximately 25-30 low- and moderate-income households. |
| | Target Date | 9/30/2024 |
| | Estimate the number and type of families that will benefit from the proposed activities | The project will assist 25-30 low- and moderate-income households. |
| | Location Description | 402 West Chew Street, Allentown, PA 18102 |
| | Planned Activities | The Matrix Code is 05Q, Subsistence Payments. The National Objective is Low/Mod Limited Clientele. |
| 7. | Project Name | North Penn Legal Services - LMI Legal Help |
| | Target Area | County Wide |

| | | |
|----|--|---|
| | Goals Supported | HSS-6 Fair Housing |
| | Needs Addressed | Housing Strategy |
| | Funding | CDBG: \$12,000.00 |
| | Description | NPLS provides advice, referrals and limited direct representation to low-income persons who are being evicted, facing foreclosure, denied housing, or forced to live in uninhabitable conditions. |
| | Target Date | 9/30/2024 |
| | Estimate the number and type of families that will benefit from the proposed activities | 40 persons |
| | Location Description | 559 Main Street, Suite 200, Bethlehem, PA 18018 |
| | Planned Activities | The Matrix Code is 05C, Legal Services. The National Objective is Low/Mod Limited Clientele. |
| 8. | Project Name | Whitehall Township – Mickley-Prydun Farm |
| | Target Area | County Wide |
| | Goals Supported | CDS-1 Community Facilities |
| | Needs Addressed | Community Development Strategy |
| | Funding | CDBG: \$170,490.00 |
| | Description | CDBG funds will be used to restore the historic Mickley-Prydun Farmstead to provide accessible meeting/workspace for Whitehall Coplay Hunger Initiative (WCHI). |
| | Target Date | 9/30/2024 |
| | Estimate the number and type of families that will benefit from the proposed activities | 320 persons. |
| | Location Description | 3540 Ruch St. Whitehall, PA 18052 |
| | Planned Activities | The Matrix Code is 16B, Non-Residential Historic Preservation. The National Objective is slums or blight on a spot basis. |

| | | |
|-----|--|---|
| 9. | Project Name | Coplay Borough – Fire Equipment |
| | Target Area | County Wide |
| | Goals Supported | CDS-5 Public Safety |
| | Needs Addressed | Community Development Strategy |
| | Funding | CDBG: \$59,640.00 |
| | Description | CDBG funding will be used to purchase a new vehicle/interceptor used in fighting fires and emergency response incidents. Consistent with goal of meeting firefighting/emergency response needs. |
| | Target Date | 9/30/2024 |
| | Estimate the number and type of families that will benefit from the proposed activities | 10,185 persons |
| | Location Description | 165 Cherry St, Coplay, PA 18037 |
| | Planned Activities | The Matrix Code is 030, Fire Stations/Equipment. The National Objective is Low/Mod Income Area Benefit. |
| 10. | Project Name | Emmaus Borough - Curb Cuts |
| | Target Area | County Wide |
| | Goals Supported | CDS-4 Accessibility |
| | Needs Addressed | Community Development Strategy |
| | Funding | CDBG: \$157,549.19 |
| | Description | Funds will be provided to reconstruct 34 curb cuts at various locations in the Borough. |
| | Target Date | 9/30/2024 |
| | Estimate the number and type of families that will benefit from the proposed activities | This project will benefit 5,378 elderly, 3,666 disabled persons and 1,636 elderly and disabled. |

| | | |
|------------|--|--|
| | Location Description | Various locations in the Borough. |
| | Planned Activities | The Matrix Code is 03K, Street Improvements. The National Objective is Low/Mod Clientele (LMC). |
| 11. | Project Name | Slatington Borough – North Street Reconstruction |
| | Target Area | County Wide |
| | Goals Supported | CDS-2 Infrastructure |
| | Needs Addressed | Community Development Strategy |
| | Funding | CDBG: \$87,399.08 |
| | Description | Funds will be provided to reconstruct the following street: North Street from Willow Avenue to 2 nd Street. |
| | Target Date | 9/30/2024 |
| | Estimate the number and type of families that will benefit from the proposed activities | This project will serve 545 low- and moderate-income persons. |
| | Location Description | North Street – Willow to 2 nd Street, Serves BG 5100-4, which is primarily residential, 72.67% LMI. |
| | Planned Activities | The Matrix Code is 03K, Street Improvements. The National Objective is Low/Mod Income Area Benefit. |
| 12. | Project Name | Slatington Borough – 5th Street Reconstruction |
| | Target Area | County Wide |
| | Goals Supported | CDS-2 Infrastructure |
| | Needs Addressed | Community Development Strategy |
| | Funding | CDBG: \$90,898.73 |
| | Description | Funds will be provided to reconstruct the following street: 5th Street from West Church St. to Franklin St. |
| | Target Date | 9/30/2024 |

| | | |
|------------|--|---|
| | Estimate the number and type of families that will benefit from the proposed activities | This project will serve 545 low- and moderate-income persons. |
| | Location Description | 5 th Street – West Church to Franklin Street, Serves BG 5100-4, which is primarily residential, 72.67%. |
| | Planned Activities | The Matrix Code is 03K, Street Improvements. The National Objective is Low/Mod Income Area Benefit. |
| 13. | Project Name | Whitehall Township - Curb Cuts |
| | Target Area | County Wide |
| | Goals Supported | CDS-4 Accessibility |
| | Needs Addressed | Community Development Strategy |
| | Funding | CDBG: \$282,000.00 |
| | Description | Funds will be provided to reconstruct 47 curb cuts at various locations in the Borough. Proposed ramps on Sunset Drive (4 ramps) (BG 5705-3, 36.25%) and New York Ave (16 ramps) and Fifth Street (27 ramps) (BG 5703-2, 42.94%). |
| | Target Date | 9/30/2024 |
| | Estimate the number and type of families that will benefit from the proposed activities | This project will benefit 1,603 elderly, 1,516 disabled persons and 615 elderly and disabled. |
| | Location Description | The curb cuts will be reconstructed on Sunset Drive, New York Avenue, and Fifth Street. |
| | Planned Activities | The Matrix Code is 03K, Street Improvements. The National Objective is Low/Mod Limited Clientele. |
| 14. | Project Name | CDBG Administration |
| | Target Area | County Wide |

| | | |
|-----|--|--|
| | Goals Supported | APM-1 Coordination APM-2 Planning |
| | Needs Addressed | Administration, Planning, and Management Priority |
| | Funding | CDBG: \$237,404.00 |
| | Description | Funds for oversight, management, and administration of the CDBG Program. |
| | Target Date | 9/30/2024 |
| | Estimate the number and type of families that will benefit from the proposed activities | 48,944 low- and moderate-income persons and 1 organization. |
| | Location Description | County-Wide; 17 South Seventh Street, Allentown, PA 18101 |
| | Planned Activities | The Regulatory Citation is General Program Administration, 570.206. The Matrix Code is 21A, General Program Administration. |
| 15. | Project Name | HOME Administration |
| | Target Area | County Wide |
| | Goals Supported | APM-1 Coordination APM-2 Planning |
| | Needs Addressed | Administration, Planning, and Management Priority |
| | Funding | HOME: \$57,462.00 |
| | Description | Funds for oversight, management, and administration of the HOME Program. |
| | Target Date | 9/30/2023 |
| | Estimate the number and type of families that will benefit from the proposed activities | 48,944 low- and moderate-income persons and 1 organization. |
| | Location Description | County-Wide; 17 South Seventh Street, Allentown, PA 18101 |

| | | |
|-----|--|---|
| | Planned Activities | The Regulatory Citation is General Program Administration, 570.206. The Matrix Code is 21A, General Program Administration. |
| 16. | Project Name | CHDO Set-Aside |
| | Target Area | County Wide |
| | Goals Supported | HSS-2 Mixed Income Housing HSS-3 Housing Rehabilitation HSS-4 Housing Construction |
| | Needs Addressed | Housing Strategy |
| | Funding | HOME: \$85,455.00 |
| | Description | 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. |
| | Target Date | 9/30/2024 |
| | Estimate the number and type of families that will benefit from the proposed activities | 1 household |
| | Location Description | County-Wide |
| | Planned Activities | To be determined. |
| 17. | Project Name | Affordable Housing Project – Valley Housing Development Corporation |
| | Target Area | County Wide |
| | Goals Supported | HSS-4 Housing Construction |
| | Needs Addressed | Housing Strategy |
| | Funding | HOME: \$400,000.00 |

| | | |
|-----|--|--|
| | Description | HOME funds will be used to assist in the development of 4 affordable housing rental units at the Mill II development in Fountain Hill for income eligible renters. |
| | Target Date | 9/30/2024 |
| | Estimate the number and type of families that will benefit from the proposed activities | 4 households |
| | Location Description | County-Wide |
| | Planned Activities | The project matrix code is 12, Construction of Housing. The national objective is Low/Mod Income Housing Benefit (LMH). |
| 18. | Project Name | Affordable Housing Project |
| | Target Area | County Wide |
| | Goals Supported | HSS-1 Home Ownership HSS-2 Mixed Income Housing HSS-3 Housing Rehabilitation HSS-4 Housing Construction |
| | Needs Addressed | Housing Strategy |
| | Funding | HOME: \$31,703.00 |
| | Description | 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. |
| | Target Date | 9/30/2024 |
| | Estimate the number and type of families that will benefit from the proposed activities | 1 household |
| | Location Description | County-Wide |
| | Planned Activities | To be determined. |

AP-50 Geographic Distribution – 91.220(f)**Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

The following information provides a profile of the population, age, and racial/ethnic composition of Lehigh County. This information was obtained from the U.S. Census Bureau American Factfinder website, <http://factfinder.census.gov>. The 2017-2021 American Community Survey 5-Year Estimates were used to analyze the social, economic, housing, and general demographic characteristics of Lehigh County. The 5-year estimates are the most recent data available for the County. The 2010 and 2020 U.S. Census data is included where possible.

Lehigh County's overall population:

- Between 2010 and 2021, the population increased by approximately 6.6%, rising from 349,497 to 372,492.

Lehigh County's age of population:

- The median age in Lehigh County is 38.8 years old.
- Youth under age 18 account for 22.9% of the population.
- Adults between the ages of 35 and 60 account for 32.0% of the population.
- Adults that are 62 years and old account for 20.3% of the population.

Racial/ethnic composition of Lehigh County from the 2017-2021 U.S. American Community Survey 5-Year Estimates:

- 62.1% are White
- 26.3% are Hispanic
- 5.9% are Black or African American
- 3.3% are Asian
- 0.5% are American Indian and Alaska Native
- 11.4% are Some Other Race
- 16.7% are Two or More Races

The median income for a family of four (4) in the Allentown-Bethlehem-Easton, PA HUD Metro FMR Area is \$97,600 for 2023. At the time of the 2017-2021 American Community Survey, median household income in Lehigh County was \$69,440 which was higher than the Commonwealth of Pennsylvania (\$67,587).

In Lehigh County, the overall percentage of low- and moderate-income (LMI) persons was 41.36% in 2015, while the First Quartile Low/Mod rate established by HUD is 38.92%. A total of 21 census tract and block groups across the County had a majority (i.e., more than 51.0%) of persons with incomes at or below 80% of the Median Family Income (MFI). A total of 36 block groups in the County had a Low/Mod rate equal to or greater than the First Quartile Low/Mod rate of 38.92%.

According to the U.S. Labor Department, the non-seasonally adjusted preliminary unemployment rate for Lehigh County in June 2023 was 4.1%, which was slightly higher than the seasonally adjusted preliminary rate of 3.8% for the Commonwealth of Pennsylvania. The seasonally adjusted national unemployment rate for June 2023 was 3.6%.

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

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

Geographic Distribution

| Target Area | Percentage of Funds |
|-------------|---------------------|
| County wide | 100% |

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The proposed activities and projects for FY 2023 are located in areas of the County with the highest percentages of low- and moderate-income persons, and those block groups with a higher than average percentage of minority persons. The following census tracts and block groups have at least 51% of the households with low- and moderate-incomes:

- C.T. 1900, B.G. 1 – South Whitehall Township
- C.T. 5100, B.G. 3 – Slatington Borough
- C.T. 5100, B.G. 4 – Slatington Borough
- C.T. 5702, B.G. 2 – Whitehall Township
- C.T. 5702, B.G. 3 – Whitehall Township
- C.T. 5703, B.G. 3 – Whitehall Township
- C.T. 5704, B.G. 1 – Whitehall Township
- C.T. 5800, B.G. 1 – Coplay Borough
- C.T. 5901, B.G. 4 – Catasauqua Borough
- C.T. 5901, B.G. 5 – Catasauqua Borough
- C.T. 6001, B.G. 2 – South Whitehall Township
- C.T. 6101, B.G. 1 – South Whitehall Township
- C.T. 6800, B.G. 1 – Fountain Hill Borough
- C.T. 6800, B.G. 4 – Fountain Hill Borough

Additionally, because Lehigh County is an exception grantee and all Census Tracts where at least 39.01% of households with low- and moderate-incomes are CDBG eligible, the following Census Tracts and Block Groups are eligible:

- C.T. 5100, B.G. 2 – Slatington Borough (47.57% LMI)
- C.T. 5200, B.G. 3 – Washington Township (44.52% LMI)
- C.T. 5601, B.G. 1 – Whitehall Township (43.24% LMI)
- C.T. 5602, B.G. 4 – Whitehall Township (43.41% LMI)
- C.T. 5702, B.G. 1 – Whitehall Township (49.31% LMI)
- C.T. 5704, B.G. 2 – Whitehall Township (43.46% LMI)
- C.T. 5800, B.G. 3 – Coplay Borough (50.39% LMI)
- C.T. 5901, B.G. 3 – Catasauqua Borough (41.35% LMI)
- C.T. 5902, B.G. 1 – Hanover Township (42.22% LMI)
- C.T. 6001, B.G. 3 – South Whitehall Township (44.62% LMI)
- C.T. 6001, B.G. 5 – South Whitehall Township (41.46% LMI)
- C.T. 6101, B.G. 3 – South Whitehall Township (46.80% LMI)
- C.T. 6202, B.G. 2 – Upper Macungie Township (44.80% LMI)
- C.T. 6202, B.G. 3 – Upper Macungie Township (40.70% LMI)
- C.T. 6303, B.G. 3 – Macungie Borough (40.51% LMI)
- C.T. 6500, B.G. 2 – Emmaus Borough (50.00% LMI)
- C.T. 6500, B.G. 3 – Emmaus Borough (47.89% LMI)
- C.T. 6701, B.G. 2 – Salisbury Township (40.12% LMI)
- C.T. 6702, B.G. 2 – Salisbury Township (39.01% LMI)
- C.T. 6703, B.G. 3 – Salisbury Township (43.81% LMI)
- C.T. 6902, B.G. 2 – Coopersburg Borough & Upper Saucon Township (43.95% LMI)

Discussion

The geographic locations and the public benefit for the FY 2023 CDBG Activities/Projects are as follows:

- **Aspire To Autonomy - Emergency Shelter** - County-wide, excluding Lower Milford Township and the cities of Allentown and Bethlehem; Fountain Hill area (address kept confidential for safety of survivors); Low/Mod Clientele (LMC).
- **Communities in Schools of the Lehigh Valley - Career Supports at LCTI** - County-wide, excluding Lower Milford Township and the cities of Allentown and Bethlehem; 1501 Lehigh Street, Suite 206, Allentown, PA 18103; Low/Mod Clientele (LMC).
- **Lehigh Valley Center for Independent Living - People Living in Accessible Community Environments (PLACE) Program** - County-wide, excluding Lower Milford Township and the cities of Allentown and Bethlehem; Low/Mod Clientele (LMC).
- **Manito Life Center - Therapeutic Riding for At-Risk Adolescents** - County-wide, excluding Lower Milford Township and the cities of Allentown and Bethlehem; Low/Mod Clientele (LMC).

- **Big Brothers Big Sisters - Sports Buddies** - County-wide excluding Lower Milford Township and the cities of Allentown and Bethlehem; Low/Mod Clientele (LMC).
- **Catholic Charities - Case Management and Rent Assistance** - County Wide excluding Lower Milford Township and the cities of Allentown and Bethlehem; Low/Mod Area Benefit (LMA).
- **North Penn Legal Services - LMI Legal Help** - County Wide excluding Lower Milford Township and the cities of Allentown and Bethlehem; Low/Mod Area Benefit (LMA).
- **Whitehall Township - Mickley-Prydun Farm** - Whitehall Township, PA; C.T. 56.02 B.G. 2, Low/Mod Area Benefit (LMA).
- **Coplay Borough - Fire Equipment** - Coplay Borough, PA; Borough Wide; Low/Mod Clientele (LMC).
- **Emmaus Borough - Curb Cuts** - Various locations through the Borough; Low/Mod Clientele (LMC).
- **Slatington Borough - North St. Reconstruction** - North Street from Willow Ave. to 2nd Street; C.T. 5100, B.G. 4, Low/Mod Area Benefit (LMA).
- **Slatington Borough - 5th St. Reconstruction** - 5th Street from West Church St. to Franklin Street; C.T. 5100, B.G. 4, Low/Mod Area Benefit (LMA).
- **Whitehall Township - Curb Cuts** - Various location throughout the Township; Low/Mod Clientele (LMC)
- **CDBG Administration** - County-wide; 17 South Seventh Street, Allentown, PA 18101.
- **HOME Administration** - County-wide; 17 South Seventh Street, Allentown, PA 18101.
- **CHDO Set-Aside** - County-wide, excluding Lower Milford Township and the cities of Allentown and Bethlehem; Low/Mod Housing (LMH).
- **Affordable Housing Project - Valley Housing Development Corporation** - County-wide, excluding Lower Milford Township and the cities of Allentown and Bethlehem; Low/Mod Housing (LMH).
- **Affordable Housing Project** - County-wide, excluding Lower Milford Township and the cities of Allentown and Bethlehem; Low/Mod Housing (LMH).

AP-55 Affordable Housing – 91.220(g)

Introduction

Lehigh County will utilize its CDBG and HOME funds to develop affordable housing units in the County. The one year goals for affordable housing in Lehigh County for FY 2023 are as follows:

| One Year Goals for the Number of Households to be Supported | |
|---|-----------|
| Homeless | 0 |
| Non-Homeless | 31 |
| Special-Needs | 0 |
| Total: | 31 |

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

| One Year Goals for the Number of Households Supported Through | |
|---|-----------|
| Rental Assistance | 25 |
| The Production of New Units | 6 |
| Rehab of Existing Units | 0 |
| Acquisition of Existing Units | 0 |
| Total: | 31 |

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

Discussion

Lehigh County will fund the following projects with CDBG and HOME funds:

- **Catholic Charities - Case Management and Rent Assistance** - CDBG funds will be used to assist vulnerable Lehigh County households with direct and immediate help to preserve their housing. (25 households)
- **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. (1 Housing Unit)
- **Affordable Housing Project - Valley Housing Development Corporation** - HOME funds will be used to assist in the development of 4 affordable housing rental units at the Mill II development in Fountain Hill for income eligible renters. (4 Housing Units)
- **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. (1 Housing Unit)

AP-60 Public Housing – 91.220(h)

Introduction

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

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

Each year, the Lehigh County Housing Authority (LCHA) receives an allocation of funds from HUD under the Capital Fund Program to undertake physical improvements. In addition, the LCHA receives operating subsidies to offset the operating deficits associated with public housing units and to carry out maintenance. The Lehigh County Housing Authority anticipates that it will receive \$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 2023 approximate allocation will be used for the following activities:

- Operations \$50,000.00
- Administration \$50,000.00
- Dwelling Structures \$550,457.00
- **Total: \$650,457.00**

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.

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

Lehigh County supports the Housing Authority's efforts to work with tenants of public housing and Section 8 Housing Choice Vouchers to achieve self-sufficiency. There are no joint projects planned for the FY 2023 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 may include education, specialized training, job readiness, job placement activities, and career advancement objectives. The goals for each participating family member are set out in Individual's Training and Service Plan. LCHA has a baseline of 1,672 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.

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

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

Discussion

Not applicable.

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

Introduction

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

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

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

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

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Continuum of Care completes 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

Current CoC policies place an emphasis on reducing Youth Homelessness. The CoC has developed the Lehigh Valley Youth Task Force to drive cross-sector systems to decrease homelessness among youth in the Lehigh Valley. Membership includes Children and Youth Services, the Allentown City Council, local schools, the Brady-Sullivan LGBT Community Center, Valley Youth House, and the Lehigh Valley Health Network. The CoC intends to increase knowledge of service providers and increase street outreach to target youth that may potentially become homeless.

Lehigh County funds the Catholic Charities – Case Management and Rent Assistance to assist at-risk households. This program provides counseling, short-term rental assistance, and utility payments to assist in the prevention of homelessness. In addition, at-risk persons will receive housing counseling services. Catholic Charities will also provide food for at-risk persons and families in conjunction with the Lehigh County Conference of Churches. Lehigh County, through its various human services programs, provides support to all the categories of non-homeless special needs populations. The County also funds the Lehigh Valley Center for Independent Living - People Living in Accessible Community Environments (PLACE) Program, which assists at-risk persons with housing location assistance and provides fair housing workshops for landlords.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Eastern PA Continuum of Care operates 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 ensures 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 conducts 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 provide information about service needs and identify gaps to help communities plan their assistance and resources.

Outreach to homeless persons will be conducted by service providers. Organizations like the Lehigh County Conference of Churches will contact the homeless individuals that use the emergency shelters during weather advisory. Lehigh County Conference of Churches will also make outreach to the chronically homeless that live in communities and attempt to assess them. This outreach, combined with case management.

Youth homelessness is 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 partners 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 providing quarterly youth training to focus on educating providers in best practices for youth, including LGBT youth.

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

Lehigh County addresses the housing needs of the homeless population within the County through the Lehigh Valley Regional Homeless Advisory Board's (RHAB) steering of CoC funds to various projects. In partnership with the City of Allentown, the Lehigh Valley RHAB determines the projects that most effectively assist the homeless population of Lehigh County through coalition meetings. The Lehigh Valley RHAB does not receive ESG funding.

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

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

- Valley Youth House (Emergency Shelter)
- Valley Youth House - Maternity Group Home (Transitional Housing)
- Valley Youth House - Supportive Housing for Families (Transitional Housing)
- Valley Youth House - Supportive Housing for Youth (Transitional Housing).

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

The CoC has implemented various strategies to ensure that those transitioning out of homelessness are able to procure permanent housing, which resulted in a 4% increase in the transition from Emergency Shelter, Transitional Housing, and Rapid Rehousing into permanent housing. Diversion strategies have been used to place those that go through intake with the CoC into Rapid Rehousing. Many of the CoC funded transitional housing beds have been converted into Rapid Rehousing beds across the 33-county area. Rapid Rehousing providers have been trained in best practices including housing first strategy, focused case management, harm reduction, motivational interviewing, and trauma-informed care. Currently, there are 111 Rapid Rehousing beds in Lehigh County; 75 of these 111 Rapid Rehousing beds are dedicated to youth.

Rapid Rehousing programs are connected to landlords and households with affordable units to sustain permanent housing. The CoC makes sure to focus on in-home case management for the tenant, as well as engagement with the landlord. Additionally, the CoC partners with mainstream service providers, such as workforce development, child care, transportation, and other resources to promote long-term stability for persons and their families that have transitioned out of homelessness. There are also 243 Permanent Supportive Housing beds dedicated to chronically homeless individuals.

Valley Youth House is a major provider of services for the homeless youth in the area. Valley Youth House will assist individuals that may have been in foster care. Valley Youth House receives funding for both Transitional Housing and Rapid Rehousing activities. Youth homelessness is 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 into this age group. There is a need for a year-round shelter for this age group, as Valley Youth House does not serve children 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.

Turning Point of the Lehigh Valley will provide housing to victims of domestic violence and their families. They provide 32 transitional housing beds for survivors fleeing immediate abuse and will partner with other agencies to find permanent housing for victims, including Third Street Alliance, which is the major Rapid Rehousing provider for this population.

Previously, Lehigh County had a robust program to assist veterans experiencing homelessness that received SSVF funding. Because of the success of the program and the resulting lower numbers of veteran homelessness, the Federal government cut funding for the program.

Discussion

The CoC allocated funding to the following projects:

- **Lehigh County Housing Authority - LCHA S+C 2022** - received \$241,210 for permanent supportive housing.
- **New Bethany Inc. - New Bethany Rapid Rehousing** - received \$135,597 for rapid re-housing.
- **Resources for Human Development, Inc. - LV ACT Housing Supports** - received \$229,840 for permanent supportive housing.
- **Lehigh County Conference of Churches - Outreach and Care Management for the Disabled, Chronically Homeless** - received \$71,545 for supportive services.
- **Lehigh County Conference of Churches - Pathways Permanent Supportive Housing Consolidation** - received \$1,071,356 for permanent supportive housing.
- **Lehigh County Conference of Churches - Pathways Permanent Supportive Housing Consolidation Expansion** - received \$26,014 for permanent supportive housing.
- **Lehigh County Conference of Churches - Pathways RRH** - received \$390,252 for rapid re-housing.
- **The Salvation Army, a New York Corporation - Allentown Hospitality House Permanent Housing Program** - received \$184,502 for permanent supportive housing.
- **Third Street Alliance for Women & Children - Lehigh Valley Rapid Re-Housing Program** - received \$387,700 for rapid re-housing.
- **Valley Housing Development Corporation - VHDC SHP #2/3 2022** - received \$403,265 for permanent supportive housing.
- **Valley Youth House Committee, Inc. - Lehigh Valley RRH for families** - received \$322,472 for rapid re-housing.
- **Valley Youth House Committee, Inc. - TH-RRH for Lehigh Valley Youth** - received \$535,694 for temporary and rapid re-housing.

AP-75 Barriers to affordable housing – 91.220(j)**Introduction:**

Lehigh County's Analysis of Impediments to Fair Housing Choice has identified the following impediments in the County:

- 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.

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

North Penn Legal Services (NPLS) is a sub-recipient of FY 2023 CDBG funds from Lehigh County. NPLS is funded as a public service activity and provides legal aid related to affordable housing, serving low- and moderate-income residents living in Lehigh County outside of Allentown and Bethlehem. NPLS staff provides assistance to residents who face eviction, are denied housing, or are forced to live in uninhabitable conditions. This activity is conducted through workshops held at local social service agencies and in mobile home parks. Information on foreclosures, consumer issues, and fair housing is also provided to the residents of Lehigh County.

In addition, NPLS monitors housing practices and counsels victims of discrimination. NPLS policies and activities promote the awareness of fair housing requirements. They provide consultation to developers and municipalities to ensure that rental and for-sale units are marketed in accordance with the affirmative marketing rules of the U.S. Department of Housing and Urban Development. NPLS ensures that all housing

programs and services provided by Lehigh County, its municipalities, and NPLS itself, are administered in a way that promotes fair housing on the basis of race, national origin, religion, gender, disability, and familial status. NPLS' fundamental mission is to increase access to affordable housing for all persons.

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

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

Discussion

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

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

1. A Fair Housing Officer has been appointed to administer (responsibilities include accepting complaints, record keeping and investigation in conjunction with NPLS).
2. Continue to enlist NPLS in the enforcement of fair housing through public education and outreach.
3. Continue to fund fair housing providers to report housing discrimination complaints.
4. Continue to investigate testing and auditing of fair housing practices through its regional fair housing providers.
5. Educate and attempt to overcome the "Not in My Back Yard" (NIMBY) attitude throughout the County through its fair housing providers.

6. Make every attempt to increase geographic choice in housing by providing links on its website for its low-income households.
7. Promote desegregation of public housing.
8. Update its fair housing section on the County website with news and items regarding fair housing (i.e. links to fair housing providers to report housing discrimination).
9. Assist in the organization of a federally supported community-based system (such as LANTA) that organizes key elements in its community to direct attention to, and help develop strategies to, affirmatively further fair housing.
10. On an annual basis, Lehigh County will declare, via proclamation, April to be Fair Housing Month.
11. Outreach to public – provide updated Housing Discrimination information.

AP-85 Other Actions – 91.220(k)

Introduction:

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

Actions planned to address obstacles to meeting underserved needs

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

- There are opportunities available for more collaborative initiatives between for-profit developers and non-profit organizations in the Lehigh Valley. By partnering with an experienced for-profit developer, a smaller non-profit can enhance its capacity in budgeting, planning, financing, and construction management skills.
- There are also opportunities for public housing authorities to create new affordable housing using LIHTCs or other funding sources.

The Lehigh Valley Planning Commission has developed various model zoning and land use controls to encourage affordable housing. Lehigh County will continue its work with the Lehigh Valley Planning Commission (LVPC) to develop and promote model ordinances for inclusionary zoning. Lehigh County has an Affordable Housing Trust Fund. The fund provides support for affordable housing projects in the County.

Actions planned to foster and maintain affordable housing

Under its FY 2019-2023 Five Year Consolidated Plan, Lehigh County proposes to foster and maintain affordable housing through the following Five Year goals and Strategies:

HOUSING STRATEGY – HSS

Goal:

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

Strategies:

- **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.

Lehigh County will address the following goal in the FY 2023 Annual Action Plan:

- **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.
- **Affordable Housing Project - Valley Housing Development Corporation** - HOME funds will be used to assist in the development of 4 affordable housing rental units at the Mill II development in Fountain Hill for income eligible renters.
- **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.

Actions planned to reduce lead-based paint hazards

Lehigh County is working to reduce potential lead-based paint hazards. Below are the County's activities to reduce lead-based paint hazards are related to rehabilitation and homeownership programs.

Rehabilitation Programs

Lehigh County will continue to ensure that:

- Applicants for rehabilitation funding receive the required lead-based paint information and understand their responsibilities.
- Staff properly determines whether proposed projects are exempt from some or all lead-based paint requirements.
- The level of Federal rehabilitation assistance is properly calculated and the applicable lead-based paint requirements determined.
- Properly qualified personnel perform risk management, paint testing, lead hazard reduction, and clearance services when required.
- Required lead hazard reduction work and protective measures are incorporated into project rehabilitation specifications.
- Risk assessment, paint testing, lead hazard reduction, and clearance work are performed in accordance with the applicable standards established in 24 CFR Part 35, Subpart R.
- Required notices regarding lead-based paint evaluation, presumption, and hazard reduction are provided to occupants and documented.
- Program documents establish the rental property owner's responsibility to perform and adhere to ongoing lead-based paint maintenance activities, when applicable.
- Program staff monitors owner compliance with ongoing lead-based paint maintenance activities.

Homeownership Programs

Lehigh County will ensure that:

- Applicants for homeownership assistance receive adequate information about lead-based paint requirements.
- County staff properly determine whether proposed projects are exempt from some or all lead based paint requirements.
- A visual assessment is performed to identify deteriorated paint in the dwelling unit, any common areas servicing the unit, and exterior surfaces of the building.
- Prior to occupancy, properly qualified personnel perform paint stabilization and the dwelling passes a clearance exam in accordance with the standards established in 24 CFR Part 35, Subpart R.
- The home buyer receives the required lead-based paint pamphlet and notices.

Lead reduction involves the implementation of a lead-based paint treatment program which will be carried out in conjunction with the County's CDBG and HOME funded housing projects/activities.

Actions planned to reduce the number of poverty-level families

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 is related to education, job training, and employment. Lehigh County remains committed to addressing the needs of its residents who live at or below the poverty level. The presence of poverty and the related social and economic problems can be a destabilizing element in communities.

In Lehigh County, the Community Action Committee of the Lehigh Valley (CACLTV) is the official anti-poverty agency. CACLTV provides rent and utility assistance, case management, and counseling services to assist with financial management, benefit entitlement assistance, home weatherization to reduce utility costs, furniture and household goods, alcohol and mental health counseling, foreclosure mitigation counseling, child care, transportation to work for up to six (6) months and assistance in purchasing a dependable vehicle, and other various programs that empower low-income households by assisting them to develop the skills needed for independent living.

Lehigh County provides CDBG funds to public service agencies to assist households below the poverty level with services and program support. The County will work with service providers to pursue resources and innovative partnerships to support the development of affordable housing, homelessness prevention, and emergency food and shelter. Lehigh County funded several projects with FY 2023 CDBG and HOME funds to assist residents and families living in poverty:

- Aspire To Autonomy - Emergency Shelter
- Communities in Schools of the Lehigh Valley - Career Supports at LCTI
- Lehigh Valley Center for Independent Living - People Living in Accessible Community Environments (PLACE) Program
- Manito Life Center - Therapeutic Riding for At-Risk Adolescents
- Catholic Charities - Case Management and Rent Assistance
- North Penn Legal Services - LMI Legal Help
- CHDO Set-Aside
- Affordable Housing Project - Valley Housing Development Corporation
- Affordable Housing Project

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

- Lehigh County works in conjunction with Lehigh Valley Economic Development Corporation (LVEDC), community organizations, other economic development groups and the Workforce

Investment Board to help enhance programs and create opportunities in the County.

- Lehigh County Economic Development Corporation (LVEDC) is able to provide manufacturing, industrial, and nonprofit organizations with low-interest financing generated through tax exempt revenue bonds.
- Pennsylvania CareerLink® Lehigh Valley offers job search counseling, skills assessment programs, GED courses, information on training programs and workshops on many subjects, including resume writing and interview skills. Considered a one-stop location for all employment needs, CareerLink offers a multi-faceted approach to the job market.

Actions planned to develop institutional structure

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

In order to address the County's housing and community development needs, the County has established an extensive public-private partnership aimed at revitalization in the County. In 2023, the partnership includes the following agencies:

- North Penn Legal Services
- Lehigh Valley Center for Independent Living (LVCIL)
- Big Brothers Big Sisters of Lehigh Valley
- Communities in Schools of the Lehigh Valley
- Aspire to Autonomy
- Manito Life Center
- Catholic Charities

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

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

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

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

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

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

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

Lehigh County will continue 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 will partner with the PA CareerLink®, the Lehigh County Housing Authority and LCTI to identify Section 3 residents and businesses and to provide feedback on available job opportunities. Such partnerships help to develop a better understanding of community needs.

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

Discussion

Monitoring

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

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

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

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

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

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

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

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

Introduction

Lehigh County receives an annual allocation of CDBG and HOME funds. The County does not expect to generate program income from any CDBG funded activities in FY 2023. Since the County receives a CDBG Federal allocation, the questions below have been completed, as applicable.

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

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

| | |
|--|---------------|
| 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed | \$0.00 |
| 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan. | \$0.00 |
| 3. The amount of surplus funds from urban renewal settlements | \$0.00 |
| 4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan | \$0.00 |
| 5. The amount of income from float-funded activities | \$0.00 |
| Total Program Income: | \$0.00 |

Other CDBG Requirements

| | |
|--|--------|
| 1. The amount of urgent need activities | \$0.00 |
| 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low- and moderate-income. Specify the years covered that include this Annual Action Plan. | 86.3% |

**HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)**

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

Lehigh County does not intend to use any other forms of investment other than those described in 24 CFR 92.205(b). Not applicable.

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

See attached Resale/Recapture Policy in the Appendix Section of the FY 2023 Annual Action Plan.

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

Not applicable.

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

Lehigh County does not intend to refinance any existing debt for multifamily housing that will be rehabilitated with HOME Funds. Not applicable.

Discussion

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

Lehigh County does not limit the beneficiaries or give preferences to a particular segment of the low-income population. The County assists on a first come, first serve basis for its HOME activities. The County will take HOME Funding Request Applications for the FY 2023 HOME funds and the Local HOME Match funds.

CDBG Program Income:

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

CDBG Percentages:

- Administrative Percentage: 20%

- Public Service Percentage: 12%
- Low- and Moderate-Income Percentage: 86.3%
- Slum and Blight Percentage: 13.7%

HOME Program:

Lehigh County became a new HOME Entitlement Community in FY 2022 and is in the process of preparing a HOME Funding Request Application to be completed by potential applicants for HOME funds. The Funding Request Application was released as part of the FY 2023 Annual Action Plan planning process. The County will continue to take applications based on projects use of HOME funds 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 Program Income:

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

HOME Percentages:

- Administrative Percentage: 10.0%
- CHDO Set-A-Side: 15%

SF 424 FORM



Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

B-23-UC-42-0011

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: Lehigh County

* b. Employer/Taxpayer Identification Number (EIN/TIN):

23-1663078

* c. UEI:

GELSFAP79LT4

d. Address:

* Street1: Government Center

Street2: 17 South 7th Street

* City: Allentown

County/Parish: Lehigh County

* State: PA: Pennsylvania

Province:

* Country: USA: UNITED STATES

* Zip / Postal Code: 18101-2401

e. Organizational Unit:

Department Name:

Community and Economic Dev.

Division Name:

Community Development

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Ms.

* First Name:

Laurie

Middle Name:

* Last Name:

Moyer

Suffix:

Title: Grants Management Specialist

Organizational Affiliation:

Department of Community and Economic Development

* Telephone Number: 610-871-1964

Fax Number:

* Email: lauriemoyer@lehighcounty.org

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

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

11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

Community Development Block Grant (CDBG)/Entitlement Grants

* 12. Funding Opportunity Number:

Not Applicable.

* Title:

Not Applicable.

13. Competition Identification Number:

Not Applicable.

Title:

Not Applicable.

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

FY 2023 Annual Action Plan for the Community Development Block Grant (CDBG) Program.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant

7

* b. Program/Project

7

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

10/01/2023

* b. End Date:

09/30/2024

18. Estimated Funding (\$):

| | |
|---------------------|--------------|
| * a. Federal | 1,247,023.00 |
| * b. Applicant | 0.00 |
| * c. State | 0.00 |
| * d. Local | 0.00 |
| * e. Other | 0.00 |
| * f. Program Income | 0.00 |
| * g. TOTAL | 1,247,023.00 |

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:

Mr.

* First Name:

Phillips

Middle Name:

* Last Name:

Armstrong

Suffix:

* Title:

County Executive

* Telephone Number:

610-782-3001

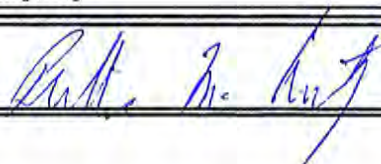
Fax Number:

610-871-2755

* Email:

phillipsarmstrong@lehighcounty.org

* Signature of Authorized Representative:



* Date Signed:

08/09/2023

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

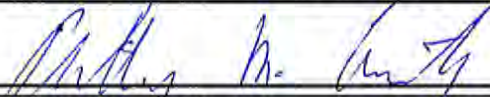
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

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

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

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

| | |
|---|------------------|
| SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL | TITLE |
|  | County Executive |
| APPLICANT ORGANIZATION | DATE SUBMITTED |
| Lehigh County | 08/09/2023 |

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:** Lehigh County

*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

23-1663078

*** c. UEI:**

GELSFAP79LT4

d. Address:

*** Street1:**

Government Center

Street2:

17 South 7th Street

*** City:**

Allentown

County/Parish:

Lehigh County

*** State:**

PA: Pennsylvania

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

18101-2401

e. Organizational Unit:

Department Name:

Community and Economic Dev.

Division Name:

Community Development

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Ms.

*** First Name:**

Laurie

Middle Name:

*** Last Name:**

Moyer

Suffix:

Title:

Grants Management Specialist

Organizational Affiliation:

Department of Community and Economic Development

*** Telephone Number:**

610-871-1964

Fax Number:

*** Email:**

lauriemoyer@lehighcounty.org

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

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

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnership (HOME) Program

* 12. Funding Opportunity Number:

Not Applicable.

* Title:

Not Applicable.

13. Competition Identification Number:

Not Applicable.

Title:

Not Applicable.

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

FY 2023 Annual Action Plan for the HOME Investment Partnership (HOME) Program.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant

7

* b. Program/Project

7

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

10/01/2023

* b. End Date:

09/30/2024

18. Estimated Funding (\$):

| | |
|---------------------|------------|
| * a. Federal | 574,620.00 |
| * b. Applicant | 0.00 |
| * c. State | 0.00 |
| * d. Local | 0.00 |
| * e. Other | 0.00 |
| * f. Program Income | 0.00 |
| * g. TOTAL | 574,620.00 |

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:

Mr.

* First Name:

Phillips

Middle Name:

* Last Name:

Armstrong

Suffix:

* Title:

County Executive

* Telephone Number:

610-782-3001

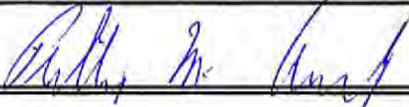
Fax Number:

610-871-2755

* Email:

phillipsarmstrong@lehighcounty.org

* Signature of Authorized Representative:



* Date Signed:

08/09/2023

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

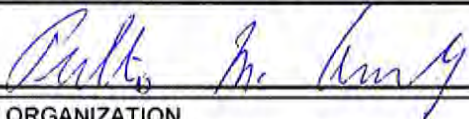
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

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

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

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

| | |
|---|-------------------------------------|
| SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL  | TITLE County Executive |
| APPLICANT ORGANIZATION Lehigh County | DATE SUBMITTED 08/09/2023 |

CERTIFICATIONS



CERTIFICATIONS

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

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

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

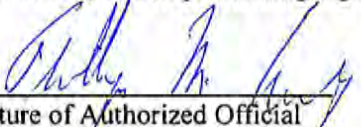
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

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

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

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

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.


Signature of Authorized Official

August 9, 2023
Date

County Executive

Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

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

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

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

Use of Funds -- It has complied with the following criteria:

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

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2022, 2023, and 2024 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

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

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

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


Excessive Force -- It has adopted and is enforcing:

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

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

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

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



Signature of Authorized Official

August 9, 2023
Date

County Executive

Title

OPTIONAL Community Development Block Grant Certification

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

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



Signature of Authorized Official

August 9, 2023
Date

County Executive
Title

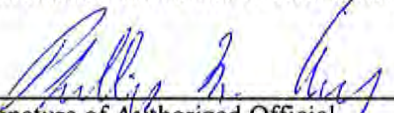
Specific HOME Certifications

The HOME participating jurisdiction certifies that:

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

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

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



Signature of Authorized Official

August 9, 2023
Date

County Executive
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

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

RESALE AND RECAPTURE POLICY



RESALE/RECAPTURE POLICY FOR LEHIGH COUNTY, PA HOME INVESTMENT PARTNERSHIP PROGRAM (HOME)

Lehigh County has prepared the following policy which addresses the issues of sale or transfer of ownership of property financed with HOME assisted funding. This policy is in accordance with the HUD Regulations found in 24 CFR Part 92.254. The issue of recapture arises when a homeowner that received homebuyer assistance under the HOME Program decides to sell the property. If the property is sold after the period of affordability has expired, there are no restrictions in terms of recapture of HOME funds that apply to such a transaction. However, if the sale occurs before the period of affordability has expired, certain regulatory limitations apply.

The regulations at 24 CFR 92.254(a)(5) give the participating jurisdiction two (2) broad options relative to the treatment of properties that are sold before the period of affordability has expired:

- The owner that received HOME assistance must sell the home to a low-income household that will use the property as their principal residence; or
- The participating jurisdiction must recapture some or all of the HOME investment that was initially extended to the homeowner.

A low-income household is defined as a household whose gross annual income does not exceed 80% of the median household income.

A home is considered to be affordable if a household earns 80% or less of the median income and they do not pay more than 30% of their income for housing and related housing costs.

It is the policy of the County, wherever possible to recapture the appropriate amount of the HOME investment rather than restricting the sale to a qualified low-income household that will use the property as its principal residence. The guidelines for recapture for the homebuyer program that the Lehigh County has established, are as follows:

1. Sale of Property Before the End of the Period of Affordability - Lehigh County guidelines for recapture are:

- The County will place a lien on the property in its favor for the full amount of the HOME investment.
- Upon sale or transfer of ownership of the home by the HOME assisted household before the period of affordability expires, the County will make every effort to recapture its pro rata share of the HOME investment from the net proceeds of the sale.
- The County will give the homeowner credit for the amount of the homeowner's down payment, closing costs, principal payments made, and

any capital improvement investments, which will reduced from the net proceeds.

- After totaling the amounts above, if the net proceeds are not sufficient to recapture the full amount of the HOME investment, the HOME investment amount may be reduced and prorated based on the time the homeowner has owned and occupied the unit, measured against the required period of affordability.
- If the net proceeds are not sufficient to recapture the full HOME investment, the homeowner may not recover more than the amount of the homeowner's down payment, principal payments, and any capital improvements invested in the property.
- The County will use HOME funds that are recaptured to assist other income eligible homebuyers.

In the event the mortgaged property is sold or otherwise transferred prior to the expiration period of affordability, as established by the amount of HOME assistance received from the date of the initial sale, then the pro rata share of the net proceeds from the sale or transfer shall be paid to Lehigh County.

Lehigh County may reduce the amount of the direct HOME subsidy on a pro rata basis for the time the homebuyer has owned and occupied the house, measured against the required affordability period. The resulting ratio would be used to determine how much of the direct HOME subsidy the County would recapture. The pro rata amount recaptured by the County cannot exceed what is available from net proceeds.

The following formula will be used to determine the amount of the HOME Subsidy the County will recapture. The pro rata amount recaptured by the County cannot exceed what is available from the net proceeds.

$$\frac{\text{Number of Years Homebuyer Occupied the Home}}{\text{Number of Years Period of Affordability}} \times \text{Total Direct HOME Subsidy} = \text{Recapture Amount}$$

The total amount payable by the borrower under the following paragraphs shall never exceed the face amount of the HOME subsidy.

To the extent that the net proceeds are less than the outstanding principal balance of the lien, the remainder shall be forgiven.

If the net proceeds are not sufficient to recapture the full HOME investment [or a reduced amount as provided for in 24 CFR Sub-Part 92.254 (a)(5)(ii)(A)(2)] and also enable the homeowner to recover the amount of his/her down payment, closing costs, and any capital improvement investments made by the homeowner since the purchase, the County may share the net proceeds. The net proceeds are

the sales price minus loan repayments (other than HOME funds) and closing costs. The net proceeds may be divided proportionally as set forth in the following mathematical formulas:

$$\frac{\text{Direct HOME Subsidy Amount}}{\text{HOME Subsidy} + \text{Homeowner Investment}} \times \text{Net Proceeds} = \text{HOME Recapture Amount}$$

$$\frac{\text{Homeowner's Amount of Investment}}{\text{HOME Subsidy} + \text{Homeowner Investment}} \times \text{Net Proceeds} = \text{Amount to Homeowner}$$

Lehigh County will be responsible for ensuring that the homeowner maintains the house, assisted with HOME funds, as their principal residence for the duration of the period of affordability. If the house is sold or ownership is transferred, during the period of affordability, the County must be notified of the sale, or transfer, and the recapture provisions will be in effect. The County will enter into a written agreement with the homeowner, as well as a mortgage and lien document will be recorded that outlines the recapture provisions.

CITIZEN PARTICIPATION



Dear Prospective Applicants:

Lehigh County is beginning the process of accepting applications for its 2023 Community Development Block Grant (CDBG), HOME, and Affordable Housing Trust Fund (AHTF) programs.

Attached to this email are all of the necessary forms, as well as guidance on creating an application. Of particular importance is the cover letter, which details the requirements for each program, as well as provide public hearing dates.

Applications for all programs will be available for download by March 17, 2023 via the 'Grant Programs' and 'CDBG Application' links at the following location:

<https://www.lehighcounty.org/Departments/Community-Economic-Development>.

Applications are due on April 17, 2023 via email or mail (postmarked by deadline). Applications are not able to be uploaded to the Lehigh County website. Applications are to be emailed to cyndiking@lehighcounty.org, or mailed to the attention of Cyndi King at the address below. Applicants mailing their submission must include 3 copies plus one original of the primary proposal. No binders, please.

County of Lehigh
Attn: Cyndi King
Government Center
Room 519
17 South 7th Street
Allentown, PA 18101

For projects that **prevent, prepare for and/or respond to COVID-19**, please complete the CDBG-CV application available on the website. Applications are accepted on a rolling basis.

If you should have any questions, please do not hesitate to contact me, or attend one of the public hearings.

Regards,

Laurie Moyer

Grants Management Specialist
County of Lehigh
Government Center
17 South 7th Street
Allentown, PA 18101
lauriemoyer@lehighcounty.org
610.871.1964

2023 CDBG and HOME NOFA

Email Distribution List

'jessica@habitatlv.org'; Aging Adult Services I-mail <AgingAdultServices@lehighcounty.org>;
'ajennings@cacvl.org'; 'amybeck@lvcl.org'; 'Ann Marie Ganchoso' <ganchoso@rcn.com>; 'Anthony Branco'
<abranco@fhboro.org>; 'Barbara Schlegel, Catasauqua DIG-IN' <mayor@catasauqua.org>; 'Beam, George E'
<gebeam@pplweb.com>; 'bncorder@northwhitehall.org'; 'Brandon Szoke' <szokebrandon@yahoo.com>; 'Brian
Carl' <brian@weisenbergtownship.org>; 'Brian Dietrich' <lynnzone@ptd.net>; 'Jennifer Doyle'
<jdoyle@theliteracycenter-lv.org>; 'Bruce Paulus' <bp44@verizon.net>; 'Bryon Reed' <reedbc@verizon.net>;
'Carol Halper' <carol.halper@mail.house.gov>; Chris Cassidy ccassidy@newbethanyministries.org; 'Cathy
Bonaskiewish' <cbonaskiewich@salisburytownship.org>; 'Charles Volk'
<charlesvolk@lehighcountyauthority.org>; chris@lcha-vhdc.org; 'daniellej@lehighvalleychamber.org'; 'David
Fink' <jbortz@ptd.net>; 'dharleman@cwsauthority.org'; 'dlamb@lvcconline.org'; 'Drew Sonntag'
<dsonntag@urdc.com>; 'Gary Hovis' <mail@coopersburgborough.org>; 'Gwen Pongracz'
<gwen.pongracz@gmail.com>; 'Howard Lieberman' <howard@bcfsol.com>; informationandreferral
<informationandreferral@lehighcounty.org>; 'Jan Brna' <brnaj@lcti.org>; 'Janice Meyers'
<jmeyers75@ptd.net>; 'jason.newhard@ssmgroup.com'; 'jfarns@borough.emmaus.pa.us'; 'Jim Buerger'
<jbuerger@commfirstfund.org>; 'John Felch' <council@felch.org>; 'Joseph Bundra'
<mayor@coplayborough.org>; 'Joseph McMahon III' <whitehalladmin@whitehalltownshipauthority.org>; 'Justin
Smith' <justinsmithn@gmail.com>; 'Kathi Krablin' <kkrablin@valleyyouthhouse.org>; 'Kermit DeLong'
<delongkermit@yahoo.com>; kwalsch@theliteracycenter-lv.org; 'Lee Rackus, Whitehall Twshp'
<lrackus@whitehalltownship.com>; 'Lupe Pearce' <lpearce@hao-lv.org>; 'Marta Gabriel'
<Marta_Gabriel@toomey.senate.gov>; 'Matthew D. Szuchyt' <mszuchyt@pasen.gov>; 'Mayor Robert Mader'
<mayor@alburtis.org>; 'Mayor Walter Niedermeyer' <waltsnest@aol.com>; 'mhandzo@cacvl.org'; 'Michelle
Raber' <n1communitycenter@gmail.com>; 'Nanse Wolfington' <nwolfington@lvwib.org>; 'Nathan Brown'
<brownn@ptd.net>; 'Pam Russo' <prusso@allentowndiocese.org>; 'Patty Vahey' <vahey.p@whitehallpl.org>;
'Rebecca Strobel' <rebeccastrobel@lvcl.org>; 'rnicolella@allentowndiocese.org'; 'Rosemary Shokunbi'
<rshokunbi@gmail.com>; 'Shane Pepe' <spepe@borough.emmaus.pa.us>; 'Sharol Lilly' <slilly@cacvl.org>;
'sharon@alburtis.org'; 'Slatington Manager' <manager@slatington.org>; 'Steven Bachman'
<scbachman@juno.com>; 'Tammy White' <tammyw@ptd.net>; 'tbeil@uppersaucon.org'; Thomas Applebach
<ThomasApplebach@lehighcounty.org>; 'Tim Mulligan' <mulligant@cisl.org>; 'Tim Paashaus'
<tpaashaus@coopersburgborough.org>; 'Todd Weidman' <tweidman@washingtonlehigh.com>; 'Tracy Fehnel'
<fehnel@southwhitehall.com>; Tracy MacDonald <TracyMacDonald@lehighcounty.org>; Virginia Haas
<VirginiaHaas@lehighcounty.org>; 'Wendy Seiffert' <seiffertw@cisl.org>; 'Wes Barrett'
<wes@wesleyworks.com>; 'Zach Graves' <zgraves@lowermac.com>; 'Alburtis' <office@alburtis.org>; 'Alfred
Regits' <amregits@aol.com>; 'Bill Vogler' <bvogler@pbfalv.org>; 'Bob Ibach' <Ribach@uppermac.org>; 'Bud
Carter' <ecarter@uppermilford.net>; 'Celia Petiprin' <hao4paz@aol.com>; 'Charles Volk'
<charlesvolk@lehighcountyauthority.org>; 'coopersburg@enter.net'; 'D Stevens' <dlsantiq@ptd.net>; 'Dan
Stevens' <dsteven@slatington.org>; 'Daniel Mohr' <djmrr@enter.net>; 'ESEP' <nknoebel@esep.org>; 'Gary
Hovis' <ghovis3065@aol.com>; 'gkormanik@lvwib.org'; 'Helen Carroll' <hcarroll@cscinc.org>; 'Ira Faro'
<ifaro@lehighchurches.org>; 'Jane Kelly' <news@northwhitehall.org>; 'Jenn Antinoro' <info@cisl.org>; 'Joan
Cheesbrough' <slatebor@ptd.net>; 'Joe Sikorski' <sikorskij@aol.com>; Lori Sywensky
<LoriS@turningpointlv.org>; 'Marvin Mann' <butchii@aol.com>; 'Barbara Schlegel, Catasauqua DIG-IN'
<mayor@catasauqua.org>; 'Mayor of Macungie' <mayor@macungie.pa.us>; 'Myra Saturen'
<info@jewishfamilyservice-lv.org>; 'Nanse Wolfington' <nwolfington@lvwib.org>; 'Norma Cusik'
<nacusick@rcn.com>; 'Renee Bickel' <BickelR@southwhitehalltp.org>; 'Richard Nalichowski'
<richnebay@yahoo.com>; 'Sean W. Morrow' <smorrow@northpennlegal.org>; 'Steve Ackerman'; 'Timothy
Hayes' <cluboflc@ptd.net>; 'Tori Morgan' <christinamorgan@southwhitehalltp.org>; 'Upper Milford'
<info@uppermilford.net>; 'Vicky Roth' <vroth@hanleco.org>; 'William Roy' <hydrex@ptd.net>; 'Brad Fatzinger'
<bfaizinger@housing-abc.org>; 'marybeth@catasauqua.org'; 'Irodriguez@workforcelv.org';
'm.grasso@vianet.org'; 'd.pioli@ViaNet.org'; 'tallen@maserconsulting.com'; 'Rayne@nhslv.org';
'scott@lvcat.org'; 'Daniel Witczak, P.E.' <dwticzak@acelaeng.com>; 'Jill Smith' <jsmith@hanovereng.com>;
'Rich Fain, CSI, CCCA' <rfain@barrysett.com>; 'Janice Meyers' <jmeyers75@ptd.net>;
'jmeyers@whitehalltownship.com'; 'travers@catasauqua.org'; 'ndischinat@lvwib.org';

'ndischinat@workforcelv.org'; 'gkormanik@workforcelv.org'; 'Lisa Walkiewicz' <l.walkiewicz@vianet.org>;
'David Lear' <DLear@lehighengineering.com>; 'publicworks@coplayborough.org'; 'Kim Bachman'
<kimb@coplayborough.org>; 'greese@lvpc.org'; 'jscott@communityfirstfund.org';
'ohinson@allentowndiocese.org'; 'mbertalan@allentowndiocese.org'; 'dbosket@caclv.org';
'sethoderewski@lvcil.org'; 'debbierozear@lvcil.org'; 'deidre.govan@use.salvationarmy.org';
'kshoemaker@arcoflehighnorthampton.org'; 'harrisw1@lcti.org'; 'ldelabar@casalv.org'; 'Coplay Mayor Dean
Molitoris' <coplaymayor@gmail.com>; 'Joan Cheesbrough' <slatebor@ptd.net>; 'cgarges@hanleco.org';
'bbeitel@lowermac.com'; 'mayor@whitehalltownship.com'; 'Victoria Coyle' <VickiC@mowglv.org>; 'Tina
Sargent' <tsargent@newbethanyministries.org>; 'Lori Molloy' <lmolloy@northpennlegal.org>; 'Becky Bradley'
<bab@lvpc.org>; 'mkovalchick@lccc.edu'; 'Deanne Best' <DMalacsics@lehighchurches.org>; 'Adrian Shanker'
<Adrian@bradburysullivancenter.org>; 'Alisa Baratta' <abaratta@thirdstreetalliance.org>; 'Deborah Nevells'
<dnevells@hanovereng.com>; 'Derek Petroski' <dpetroski@kceinc.com>; 'Dawn Godshall'
<dgodshall@caclv.org>; 'ddietrich@nhsgreaterberks.org'; 'glandi@allentowndiocese.org';
'tdakuginow@allentowndiocese.org'; 'jmriddle@newbethanyministries.org'; 'Katie Suppes'
<katie@bradburysullivancenter.org>; 'Matt Easterwood' <matt@bradburysullivancenter.org>; 'Robert Glisson'
<manager@macungie.pa.us>; 'Kate Cohen' <katecohen@gv-ymca.org>; 'publicworks@coplayborough.org';
'cyfvet@aol.com'; Vicki Piontek vicki.piontek@gmail.com; eric@kellyn.org; Meagan Grega MD
meagan@kellynfoundation.org; kjordan@caclv.org; Emily Forrester <eforrester@newbethanyministries.org>;
Teri Dakuginow (tdakuginow@allentowndiocese.org); Tom Miller (tmiller@allentowndiocese.org); Marianne
Werling MARIANNEWERLING@lehighcounty.org; Chris Feiertag chris@lcha-vhdc.org;
Dennis@sightsforhope.org; jasonpeters@lehighcountyauthority.org; agrannummosley@lccc.edu;
vbehe@caclv.org; Christe Konopitski christe@sightsforhope.org; smaldonadovargas@lccc.edu;
rkern@coplayborough.org; lbodish@coplayborough.org; egratz@fhboro.org;
jmeyers@whitehalltownship.com; mharakal@whitehalltownship.com; amber@pathtoautonomy.org;
aludlow@lccc.edu; ellen@lcha-vhdc.org; cgarges@northwhitehall.org; info@lehighconservation.org;
equus@ptd.net



COUNTY OF LEHIGH

Office of Community Development

Laurie A. Moyer
Grants Management Specialist

March 1, 2023

Dear Grant Applicant:

The County of Lehigh is accepting applications for the following grant programs:

- Community Development Block Grant program (Title I of the Housing and Community Development Act of 197, as amended). The 2023 CDBG allocation is estimated to be \$1,229,243.
- HOME Investment Partnerships Program (Title II of the National Affordable Housing Act of 1990, as amended). The 2023 HOME allocation is estimated to be \$500,000. The 2022 HOME allocation is also available in the amount of \$750,000.
- Affordable Housing Trust Fund (AHTF). The 2023 AHTF allocation is estimated to be \$500,000.

The AHTF Notice of Funding Availability and the CDBG and HOME applications are available for download via the Lehigh County Department of Community & Economic Development's webpage on Lehigh County's website (<https://www.lehighcounty.org/Departments/Community-Economic-Development>).

CDBG

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

Applications are being accepted for all projects as listed on the attached eligible CDBG activities list. Funding determinations will be made in accordance with Lehigh County's Annual Plan Process guidelines.

Of particular interest, please be aware of scoring criteria for the following types of CDBG projects.

- Construction Projects
 - Projects located in a low- to moderate-income (LMI) municipality will receive priority consideration for funding. Municipalities designated as LMI are Catasauqua, Coplay, Hanover, Fountain Hill, Macungie, and Slatington.
 - Projects must meet one of Lehigh County's Five-Year Consolidated Plan goals.
 - Consideration will also be given to projects not located in an LMI community. Such projects should meet the following criteria:
 - Ability of the new project to be completed between January 1, 2024 and August 31, 2024.
 - Applicability to Lehigh County's Five-Year Consolidated Plan goals.
 - Hard cost match of 10% of request is dedicated by the applicant to completing project construction.
 - CDBG request doesn't exceed \$125,000.

*17 South Seventh Street
Allentown, Pennsylvania 18101
Phone: 610-871-1964*



COUNTY OF LEHIGH

Office of Community Development

Laurie A. Moyer
Grants Management Specialist

- Public Service Projects
 - Projects not funded via FY 2022: applications will be accepted for new or existing services. Applications for existing services must prove at least a 40% **quantifiable** increase in the need for the service over the past 12 months.
 - On the CDBG application webpage, there are examples illustrating public services and quantifiable increase in need. Please reference this page, entitled “Quantifiable Increase for Public Services” for details on satisfying the documentation requirements.
 - Projects funded via FY 2022 and asking for an increase in funding must provide data proving that there was at least a 40% quantifiable increase in the need for services over the past 12 months.
 - Projects funded via FY 2022 and not asking for an increase in funding do not need to prove an increase in need.
 - All projects must fit into Lehigh County’s Five-Year Consolidated Plan goals and substantiate the ability to spend down the requested amount between October 1, 2023 and September 31, 2024.

Two separate CDBG applications are available. Except for agencies submitting a public service project, all applicants should complete the ‘Public Facility, Construction and Other Projects’ application. Applicants should also notice the other documents available for download from the webpage. Information within the documents will need to be referenced when completing the application.

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

HOME

The County of Lehigh is seeking applications from housing organizations for projects benefiting Lehigh County residents living outside of the city limits of Allentown, Bethlehem, and Lower Milford Township. Enclosed you will find a HOME application, as well as an application for CHDOs (Community and Housing Development Organizations). Each application includes program requirements, as well as the forms that must be submitted for each project. Funding determinations will be made in accordance with Lehigh County’s Annual Plan Process guidelines. HOME requires a 25% match.

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

AHTF

The County of Lehigh is seeking applications from housing organizations for projects benefiting Lehigh County residents. Unlike CDBG and HOME, the geographic location of the project is not restricted for AHTF. Enclosed you will find a Notice of Funding Availability (NOFA) which includes guidance on creating an application. Funding determinations will be made in accordance with guidance set forth within Ordinance 2007-182.

The submittal of an AHTF application does not trigger federal regulations for the project.

*17 South Seventh Street
Allentown, Pennsylvania 18101
Phone: 610-871-1964*



COUNTY OF LEHIGH

Office of Community Development

Laurie A. Moyer
Grants Management Specialist

PUBLIC HEARINGS

The Lehigh County Department of Community & Economic Development will hold two (2) public hearings in March. The public hearings are duplicate sessions which will include discussion on the application process, provide information on project eligibility and fundability, and collect comments about the CDBG and HOME programs from the public.

- **March 23, 2023 at 3:00 pm** via Zoom
 - For an invitation to the Zoom, please contact Cyndi King at cyndiking@lehighcounty.org.
- **March 28, 2023 at 10:00 am** in Room 225 of the Lehigh County Government Center.

The Lehigh County Department of Community & Economic Development will hold another public hearing on **July 11, 2023 at 12:00 pm** in Room 225 of the Lehigh County Government Center to announce the CDBG and HOME awards, as well as collect comments about the programs from the public prior to sending the FY 2023 Annual Plan to HUD. Awards for AHTF will be announced at a later date.

The due date for all applications is **April 17, 2023**. Applications can be submitted via mail or email. Emails shall be directed to cyndiking@lehighcounty.org. **Applicants who choose to mail their submissions must include one original and three copies of the primary application**. Multiple copies of sundry supporting documents are not desired. Please do **not** use binders (three-ring or plastic binding). Applications must be postmarked by April 17, 2023 in order to be considered for funding.

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

In the meantime, should you have questions or need technical assistance pertaining to the CDBG, HOME and AHTF program, please do not hesitate to call me at (610) 871-1964.

Sincerely,

A handwritten signature in cursive script that reads "Laurie A. Moyer".

Laurie Moyer
Grants Management Specialist

*17 South Seventh Street
Allentown, Pennsylvania 18101
Phone: 610-871-1964*



2023 CDBG APPLICATION

Public Facility, Construction and "Other" Projects



COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

Section 1:

Project Name: _____

Name of Agency or Municipality: _____

Address of Project Site: _____

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

☐ Other

Federal Tax ID # (FEIN): _____

DUNS #: _____

SAM (System for Award Management) Renewal Date: _____

Chief Official's Name and Title

(This is the person who will sign the subrecipient agreement): _____

Address 1: _____

Address 2: _____

Phone: _____

Email: _____

Contact Person's Name and Title

(This person will be the main contact for project delivery): _____

Address 1: _____

Address 2: _____

Phone: _____

Email: _____

Funding Request:

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

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

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

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



2023 CDBG APPLICATION

Public Facility, Construction and "Other" Projects



Section 2:

Fundability Determination - All projects must meet one national objective.

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

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

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

☐ The project benefits an entire census block group in which 38.29% or more of residents have low or moderate incomes. List census tract: _____ and block group: ____.

Total population in this block group: _____

Total low- to moderate-income population in this block group: _____

Percent of population is low- to moderate-income: _____%

☐ The project benefits multiple census block groups in which the average number of low- to moderate-income residents is 38.29% or more. Provide include the following information within the project narrative: applicable census block group(s), universe population for each block group, and LMI population for each block group.

☐ The project benefits an area that is smaller than a census block group. We have conducted a survey of residents in order to demonstrate that 51% or more of residents have low or moderate incomes. (Please include survey as *Attachment A*).

☐ The project will benefit a group of persons who are presumed eligible for assistance because they are in one of the following categories: seniors; severely disabled adults; homeless; battered spouses; abused/neglected children and youth; illiterate adults; migrant farm workers; persons with HIV/AIDS.

☐ The project will serve specific persons or households (i.e.: housing assistance). We will verify the incomes of individuals or households before approving their participation.



2023 CDBG APPLICATION

Public Facility, Construction and “Other” Projects



Project Beneficiaries

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

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

For economic development projects, list *number of businesses* expected to be served _____

and *number of jobs expected to be created/retained*, if applicable _____

Will the project primarily benefit residents described as:

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

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

Section 3

Project Narrative: In a separate document, provide a project narrative. The narrative shall describe the project, and address all of the following details:

- ☐ The need addressed by the project.
- ☐ The benefit to low-income residents (how will the project improve the lives of low-income residents)
- ☐ The goals and objectives of the program, and how they will be achieved
- ☐ If the project is located within a historic area or impacts a historic site. If historic, attach pictures of the historic site and potential impact.
- ☐ If the project addresses State or Federal mandates
- ☐ Which Lehigh County Consolidated Plan goal(s) does this project address?
- ☐ The activities to be undertaken, including the scope of work and timeframe/implementation schedule.
- ☐ A description of the project’s construction footprint as well as the project’s area of benefit.
- ☐ Provide a census block group map clearly depicting the project footprint and the project’s area of benefit.
- ☐ Provide a neighborhood map (Google or suitable alternative) depicting the project footprint.



2023 CDBG APPLICATION

Public Facility, Construction and “Other” Projects



- ☐ Provide color photographs or JPG files of the project area. Include pictures of specific areas of need, the project footprint, as well as adjacent housing and landscape pictures.
- ☐ If the project involves acquisition, rehabilitation, and/or demolition of a building, provide photographs of the building (inside, if possible, and outside) and adjacent buildings/structures in a digital/electronic format. State the year the building was constructed: ____

Section 4

Environmental Review

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

- ☐ Project involves acquisition, alteration, construction, or demolition of a building more than 50 years old. If so, describe the building in the project narrative, including the year the building was constructed. Provide photographs of the building and adjacent buildings/structures in a digital/electronic format.
- ☐ Project location is in a possible historic district.
- ☐ Project is adjacent to highways or railroad tracks.
- ☐ Project is within 2,500 feet of a civilian airport (ABE, Queen City, local airfield).
- ☐ Project will affect endangered species identified in a nearby area.
- ☐ The project is in a 100-year floodplain. Note – flood insurance is required for insured property located within a 100-year floodplain.
- ☐ The project is in a 500-year floodplain.
- ☐ There is evidence of an underground storage tank on the property. Address the issue within the project narrative, and provide photos and a map depicting the affected area.
- ☐ Project is close to commercial enterprises storing hazardous materials.
- ☐ Onsite or nearby, there are toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or will conflict with the intended use of the property. Address the issue within the project narrative, and provide a map depicting the presence of the contamination.

Within 1 mile of the project site, current or planned stationary aboveground storage containers exist:

- ☐ Of more than 100-gallon capacity, containing common liquid industrial fuels
- ☐ Of any capacity, containing hazardous liquids or gases that are not common liquid industrial fuels

****Submit a FEMA Firm Panel map (in color) with the project location clearly marked. This is a requirement regardless of whether or not the project is located within a flood plain.**



2023 CDBG APPLICATION

Public Facility, Construction and “Other” Projects



Section 5

Davis Bacon Wages

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

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

Section 6

Economic Opportunities (Section 3 Projects)

The Section 3 program requires recipients of HUD funding to direct employment, training, and contracting opportunities to low-income individuals and the businesses that employ these persons within their community. Section 3 is a provision of the HUD Act of 1968 and is found at 12 U.S.C. 1701u. The regulations are found at 24 CFR Part 75.

Per this statutory language, recipients of HUD funds (grantees, subrecipients, and contractors) shall ensure that “to the greatest extent feasible,” when certain HUD funds are used to assist housing and community development projects, preference for construction-related training, jobs, and contracting opportunities go to low- and very low-income people (Section 3 workers) and to businesses that are owned by low- and very low-income persons or businesses that hire them. These opportunities are both gender and race neutral.

Section 3 projects are housing rehabilitation, housing construction, and other public construction projects assisted under HUD programs that provide housing and community development financial assistance when the total amount of assistance to the project exceeds a threshold of \$200,000. Subrecipients will be required to assist non-Section 3 firms in hiring of Section 3 workers if the lowest, responsible bidder is not a certified Section 3 firm. Section 3 projects must meet or exceed Section 3 benchmarks for total number of labor hours worked on the CDBG-funded project by Section 3 workers (25%) and by Targeted Section 3 workers (5%).

Please check all that apply to the project:

- ☐ This is a housing or community development project of which the amount of HUD assistance will exceed \$200,000.
- ☐ This is a housing or community development project which will NOT have HUD assistance exceeding \$200,000.
- ☐ This is a housing or community development project not involving construction.



Public Facility, Construction and “Other” Projects

Section 7

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

| LINE ITEM BUDGET FORM – PUBLIC FACILITY AND “OTHER” PROJECTS | | | | |
|---|--------------|----------------------|--------------|-------|
| Name of Agency/Municipality: | | Project Name: | | |
| Instructions: Please use the following format to present your proposed line-item budget. In Column A, list all expense categories associated with the CDBG-funded project. In Column B, provide the CDBG amount associated with the expense category. In Column C, provide the amount of match associated with the expense category. Record keeping responsibilities and other supportive services should be taken into consideration when calculating match. In Column D, name the source of the match dollars. In Column E, sum cells B & C in each line. Please also sum column B, C & E at the bottom of the form. Further detail should be provided within the Budget Narrative. Project cost estimates prepared by architectural/engineering firms can be submitted in addition to, but not in lieu of, the budget form. | | | | |
| A | B | C | D | E |
| CATEGORY | CDBG REQUEST | MATCH | MATCH SOURCE | TOTAL |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| TOTAL | \$ | \$ | N/A | \$ |



2023 CDBG APPLICATION

Public Facility, Construction and "Other" Projects



Applicant Certification

Electronic or digital signature is acceptable on this application form.

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

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

Name

Date

Title



2023 CDBG APPLICATION

Public Facility, Construction and "Other" Projects



Lehigh County does not require an original signature for the Fair Housing Statement and Non-Delinquency Certification. Electronic or digital signature is acceptable on this application form.

Fair Housing Statement

I, as representative of the applicant, attest that the applicant has agreed to adhere to the regulations set forth by the Fair Housing Act:

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

Signature: _____

Name and Position

Date

Certification of Non-Delinquency

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

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

If an organization becomes delinquent on taxes owed the County during a year when said organization is budgeted to receive a grant, the County shall withhold grant funds in lieu of taxes until taxes are paid in full. The County shall not give grants to an organization that is also a lessee of the County until the rent due the County is paid in full as provided for in the terms of the lease agreement.

Signature: _____

Name and Position

Date



2023 CDBG APPLICATION

Public Facility, Construction and “Other” Projects



Checklist of Required Documents

To be considered for an award, all applications must include the following documents:

1. ☐ Application cover sheet with project summary - Section 1
2. ☐ Project Fundability and Beneficiaries – Section 2
3. ☐ Project Narrative with Supporting Documentation – Section 3
4. ☐ Environmental Review Information with FEMA Floodplain Map – Section 4
5. ☐ Davis Bacon Wages – Section 5
6. ☐ Section 3 Regulations – Section 6
7. ☐ Budget Narrative and Budget Form – Section 7
8. ☐ Applicant Certification
9. ☐ Fair Housing Statement
10. ☐ Certification of Non-Delinquency

Email applications to cyndiking@lehighcounty.org by 4:00 pm on April 17, 2023. Applications can also be mailed to Cyndi King, but must be postmarked by April 17, 2023 to be considered for award.

Additionally, as required per Lehigh County’s grant ordinance, all of the following documents must be EMAILED to cyndiking@lehighcounty.org. **No hard copies will be accepted.** Documents will be posted on Lehigh County’s website soon after application submission and removed after ordinance approval:

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



2023 CDBG APPLICATION

Public Service Projects



COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

Section 1:

Project Name:

Name of Agency or Municipality: _____

Address of Project Site: _____

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

Federal Tax ID # (FEIN): _____

DUNS #: _____

SAM (System for Award Management) Renewal Date: _____

Chief Official's Name and Title: _____

Address 1: _____

Address 2: _____

Phone: _____

Email: _____

Contact Person's Name and Title: _____

Address 1: _____

Address 2: _____

Phone: _____

Email: _____

Funding Request:

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

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

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

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



2023 CDBG APPLICATION

Public Service Projects



Public Service Project Worksheet:

1. Was this project funded via 2022 CDBG?
 - ☐ Yes – go to Question 2.
 - ☐ No – go to Question 3.

2. Are you requesting the same amount (or less than) the amount awarded via 2022 CDBG for the same project?
 - ☐ Yes – skip the rest of this Public Service Project Worksheet section. (The Public Service eligibility requirements have been met.)
 - ☐ No – go to question 3.

3. Is this a new project being offered by your agency?
 - ☐ Yes - skip the rest of this Public Service Project Worksheet section. (The Public Service eligibility requirements have been met.)
 - ☐ No – go to question 4.

4. Are you able to prove a quantifiable increase in need over the past 12 months, enabling the proposed project to be funded?
 - ☐ Yes – go to question 5.
 - ☐ No – If the project was funded via 2022 CDBG, the project can only request the same amount as previously awarded. If the project is not new, and did not receive 2022 CDBG, then the project is ineligible. (Stop here – and do not submit an application.)

5. Please describe the need for the project 12 months ago vs. the current need. Also, describe how the quantifiable data was collected. Qualitative support will not be accepted. If only qualitative support exists, stop here and do not submit an application.



2023 CDBG APPLICATION

Public Service Projects



Section 2:

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

Eligibility Determination - All projects must meet one (1) national objective.

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

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

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

- ☐ The project will exclusively serve a group of persons who are presumed to be LMI because they are in one of the following categories: seniors, severely disabled adults, homeless, battered spouses, abused/neglected children and youth, illiterate adults, migrant farm workers, or persons with HIV/AIDS.
- ☐ Income surveys will be collected from participating households, proving that at least 51% of the households are LMI. (100% of the households must live outside of Allentown, Bethlehem, and Lower Milford Township.)
- ☐ The project will serve specific persons or households (i.e., housing assistance). Lehigh County will verify the incomes of individuals or households before approving their participation.
- ☐ Project activities will occur exclusively within, or by household living within, LMI block groups.

Project Beneficiaries

Estimated total number of individuals to be served by this project? _____

Is the project intended to primarily benefit residents described as:

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



2023 CDBG APPLICATION

Public Service Projects



Section 3: Agency Capacity

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

Name:

Title:

Telephone Number:

Email Address:

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

Name:

Title:

Telephone Number:

Email Address:

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

Name:

Title:

Telephone Number:

Email Address:

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

Name:

Title:

Telephone Number:

Email Address:

List the evaluation tools your agency plans to employ to track and monitor the progress of the project.



LINE ITEM BUDGET FORM – PUBLIC SERVICE PROJECTS

Name of Agency/Municipality:

Project Name:

Instructions: Please use the following format to present your proposed line item budget. In Column A, list all expense categories associated with the project. In Column B, provide the CDBG amount associated with the expense category. In Column C, provide the amount of match associated with the expense category. In Column D, name the source of the match dollars. In Column E, sum the amount of dollars associated with each expense category. Be sure to also sum the totals of column B, C & E.

| A | B | C | D | E |
|----------|--------------|-------|--------------|-------|
| CATEGORY | CDBG REQUEST | MATCH | MATCH SOURCE | TOTAL |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| TOTAL | \$ | \$ | N/A | \$ |

Please note, CDBG reimbursed materials and supplies must be procured according to your organization's formal, written procurement guidelines. If guidelines are informal, Lehigh County procurement guidelines must be followed.

Nonprofits that have a negotiated federal indirect cost rate may include those costs in the CDBG request. Alternatively, the de minimis rate of 10 percent of the modified total direct costs (MTDC) can be included.

Budget narrative shall be provided in a separate, Word document.
See Checklist of Required Documents for required components of the narrative.



2023 CDBG APPLICATION

Public Service Projects



EXHIBIT A - NON-PROFIT CERTIFICATION

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

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

Signature

Date

Title





EXHIBIT B - FAIR HOUSING STATEMENT

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

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

Signature:

Organization Signature

Date





2023 CDBG APPLICATION

Public Service Projects



EXHIBIT C – Certification of Non-Delinquency to Lehigh County

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

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

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

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

Signature:

Organization Signature

Date





2023 CDBG APPLICATION

Public Service Projects



Checklist of Required Documents

All applicants must include:

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

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

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

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

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

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

Submit the application via email to cyndiking@lehighcounty.org. Hard copy applications are also acceptable if postmarked by the application deadline.



2023 CDBG APPLICATION

Public Service Projects



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

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

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

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



2023 HOME APPLICATION



HOME INVESTMENT PARTNERSHIPS PROGRAM

2023

Section 1:

Project Name: _____

Name of Agency or Municipality: _____

Address of Project Site: _____

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

☐ Other

Federal Tax ID # (FEIN): _____

DUNS #: _____

SAM (System for Award Management) Renewal Date: _____

Chief Official's Name and Title

(This is the person who will sign the subrecipient agreement): _____

Address 1: _____

Address 2: _____

Phone: _____

Email: _____

Contact Person's Name and Title

(This person will be the main contact for project delivery): _____

Address 1: _____

Address 2: _____

Phone: _____

Email: _____

Funding Request:

Total HOME funding requested (column B on budget form): \$ _____

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

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

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



2023 HOME APPLICATION



Section 2:

Fundability Determination – Eligible activities are described in 24 CFR 92 Subpart E

A. Which of the following activities will be included in this project? (Check all that apply)

- ☐ Housing Rehabilitation (to convert existing structures into affordable housing)
- ☐ Housing Acquisition (intended to provide affordable housing)
- ☐ New Construction of affordable housing
- ☐ Homebuyer Assistance
- ☐ Tenant-Based Assistance

B. At least 15% of HOME funds must be set aside for Community-Based Housing Organizations (CHDO's) as described in 24 CFR 92 Subpart G. Is your agency applying for CHDO certification? See attached CHDO application.

- ☐ Yes
- ☐ No

Project Beneficiaries

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

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

For homebuyer/tenant-based assistance projects, list *number of households* expected to be served

Will the project primarily benefit residents described as:

- ☐ Extremely low incomes (30% of area median income [AMI] or less)
- ☐ Very low incomes (50% of AMI or less) (**Households receiving tenant-based assistance must be at or below 60% AMI**)
- ☐ Low/moderate incomes (80% of AMI or less)
- ☐ Belonging to a Minority Group
- ☐ Senior Citizens
- ☐ Persons with Disabilities
- ☐ Veterans
- ☐ Other Underserved Constituency (describe): _____



2023 HOME APPLICATION



Projects involving 5 or more HOME-assisted units must develop an affirmative marketing plan as described in 24 CFR 92.351.

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

Section 3

Project Narrative: In a separate document, provide a project narrative. The narrative shall describe the project, and address all of the following details:

- ☐ The need addressed by the project.
- ☐ The benefit to low-income residents (how will the project improve the lives of low-income residents)
- ☐ The goals and objectives of the program, and how they will be achieved
- ☐ If the project is located within a historic area or impacts a historic site. If historic, attach pictures of the historic site and potential impact.
- ☐ If the project addresses State or Federal mandates
- ☐ Which Lehigh County Consolidated Plan goal(s) does this project address?
- ☐ The activities to be undertaken, including the scope of work and timeframe/implementation schedule.
- ☐ A description of the project's construction footprint as well as the project's area of benefit.
- ☐ Provide a census block group map clearly depicting the project footprint and the project's area of benefit.
- ☐ Provide a neighborhood map (Google or suitable alternative) depicting the project footprint.
- ☐ Provide color photographs or JPG files of the project area. Include pictures of specific areas of need, the project footprint, as well as adjacent housing and landscape pictures.
- ☐ If the project involves acquisition, rehabilitation, and/or demolition of a building, provide photographs of the building (inside, if possible, and outside) and adjacent buildings/structures in a digital/electronic format. State the year the building was constructed: ____



2023 HOME APPLICATION



Section 4

Environmental Review

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

- ☐ Project involves acquisition, alteration, construction, or demolition of a building more than 50 years old. If so, describe the building in the project narrative, including the year the building was constructed. Provide photographs of the building and adjacent buildings/structures in a digital/electronic format.
- ☐ Project location is in a possible historic district.
- ☐ Project is adjacent to highways or railroad tracks.
- ☐ Project is within 2,500 feet of a civilian airport (ABE, Queen City, local airfield).
- ☐ Project will affect endangered species identified in a nearby area.
- ☐ The project is in a 100-year floodplain. Note – flood insurance is required for insured property located within a 100-year floodplain.
- ☐ The project is in a 500-year floodplain.
- ☐ There is evidence of an underground storage tank on the property. Address the issue within the project narrative, and provide photos and a map depicting the affected area.
- ☐ Project is close to commercial enterprises storing hazardous materials.
- ☐ Onsite or nearby, there are toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or will conflict with the intended use of the property. Address the issue within the project narrative, and provide a map depicting the presence of the contamination.

Within 1 mile of the project site, current or planned stationary aboveground storage containers exist:

- ☐ Of more than 100-gallon capacity, containing common liquid industrial fuels
- ☐ Of any capacity, containing hazardous liquids or gases that are not common liquid industrial fuels

****Submit a FEMA Firm Panel map (in color) with the project location clearly marked. This is a requirement regardless of whether or not the project is located within a flood plain.**



2023 HOME APPLICATION



Section 5

Davis Bacon Wages

All construction projects involving 12 or more units that are funded in whole or in part with HOME funds are subject to Davis-Bacon Federal Wage Rates. Davis-Bacon Federal Wage Rates may be subject to State (PA) prevailing wage rates. *Choose one:*

- ☐ The project will go out to bid, subject to Davis-Bacon Federal Wage Rates.
- ☐ The project will include less than 12 housing units.
- ☐ The project does not involve construction.

Section 6

Economic Opportunities (Section 3 Projects)

The Section 3 program requires recipients of HUD funding to direct employment, training, and contracting opportunities to low-income individuals and the businesses that employ these persons within their community. Section 3 is a provision of the HUD Act of 1968 and is found at 12 U.S.C. 1701u. The regulations are found at 24 CFR Part 75.

Per this statutory language, recipients of HUD funds (grantees, subrecipients, and contractors) shall ensure that "to the greatest extent feasible," when certain HUD funds are used to assist housing and community development projects, preference for construction-related training, jobs, and contracting opportunities go to low- and very low-income people (Section 3 workers) and to businesses that are owned by low- and very low-income persons or businesses that hire them. These opportunities are both gender and race neutral.

Section 3 projects are housing rehabilitation, housing construction, and other public construction projects assisted under HUD programs that provide housing and community development financial assistance when the total amount of assistance to the project exceeds a threshold of \$200,000. Subrecipients will be required to assist non-Section 3 firms in hiring of Section 3 workers if the lowest, responsible bidder is not a certified Section 3 firm. Section 3 projects must meet or exceed Section 3 benchmarks for total number of labor hours worked on the HUD-funded project by Section 3 workers (25%) and by Targeted Section 3 workers (5%).

Please check all that apply to the project:

- ☐ This is a housing or community development project of which the amount of HUD assistance will exceed \$200,000.
- ☐ This is a housing or community development project which will NOT have HUD assistance exceeding \$200,000.
- ☐ This is a housing or community development project not involving construction.



2023 HOME APPLICATION



Applicant Certification

Lehigh County requires an original signature for the Applicant Certification. Electronic or digital signature is acceptable on this application form. Original must be mailed to Cyndi King and received by May 2, 2023 in order to be considered for an award.

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

- The proposed project will not result in permanent involuntary displacement of any family, individual, business, non-profit organization or farm, or any of their personal property.
- If selected to receive HOME funding, the project will be operated in accordance with all applicable laws and regulations, include 24 CFR 92 Subpart E , Civil Rights Acts, the Fair Housing Act and the Americans with Disability Act.
- I am authorized by the municipality or organization identified within to submit this application.
- Reimbursement of Funds – The applicant agrees to reimburse Lehigh County for any expenditures paid to the applicant that are found to be ineligible under the HOME program guidelines.
- Environmental Review Clearance – The applicant agrees not to obligate funding for this project until Lehigh County certifies that the environmental review is clear and accepted by HUD.
- Allocations – The applicant agrees that all projections of funds assume the continuation of the federal HOME program and that the County is not responsible for costs incurred should the program be discontinued.

Name

Date

Title



2023 HOME APPLICATION



Lehigh County does not require an original signature for the Fair Housing Statement and Non-Delinquency Certification. Electronic or digital signature is acceptable on this application form.

Fair Housing Statement

I, as representative of the applicant, attest that the applicant has agreed to adhere to the regulations set forth by the Fair Housing Act:

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

Signature: _____

Name and Position

Date

Certification of Non-Delinquency

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

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

If an organization becomes delinquent on taxes owed the County during a year when said organization is budgeted to receive a grant, the County shall withhold grant funds in lieu of taxes until taxes are paid in full. The County shall not give grants to an organization that is also a lessee of the County until the rent due the County is paid in full as provided for in the terms of the lease agreement.

Signature: _____

Date

Name and Position



2023 HOME APPLICATION



Checklist of Required Documents

To be considered for an award, all applications must include the following documents:

1. ☐ Application cover sheet with project summary - Section 1
2. ☐ Project Fundability and Beneficiaries – Section 2
3. ☐ Project Narrative with Supporting Documentation – Section 3
4. ☐ Environmental Review Information with FEMA Floodplain Map – Section 4
5. ☐ Davis Bacon Wages – Section 5
6. ☐ Section 3 Regulations – Section 6
7. ☐ Budget Narrative and Budget Form – Section 7
8. ☐ Applicant Certification – electronic or digital signature on form, original via mail by 5/2/23
9. ☐ Fair Housing Statement
10. ☐ Affirmative Marketing Plan (if project involves 5 or more units)
11. ☐ Certification of Non-Delinquency
12. ☐ CHDO Application (if answer is “yes” to question 2B)

Email applications to cyndiking@lehighcounty.org by April 15, 2023. Applications can also be mailed to Cyndi King, but must be postmarked by April 15, 2023 to be considered for award.

Additionally, as required per Lehigh County’s grant ordinance, all of the following documents must be EMAILED to cyndiking@lehighcounty.org. **No hard copies will be accepted.** Documents will be posted on Lehigh County’s website soon after application submission and removed after ordinance approval:

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

COUNTY OF LEHIGH APPLICATION FOR COMMUNITY HOUSING DEVELOPMENT ORGANIZATION (CHDO) CERTIFICATION 2023

The National Affordable Housing Act of 1990 (the Act) created the HOME Investment Partnerships Program (HOME). The Act's objectives include promoting partnerships between states, local governments, and nonprofit organizations to expand the supply of decent, safe, and affordable housing. The Act requires each Participating Jurisdiction (PJ) to set aside 15% of its HOME funds for Community Housing Development Organizations (CHDOs). The HOME Final Rule requires that a PJ certify that an organization meets the CHDO definition and recertification will occur on an annual basis.

To be recognized as a CHDO, an organization must have the following:

- A 503(c)(3) or (c)(4) ruling from the IRS.
- A governing board consisting of not less than one-third low-income persons and not more than one-third public officials.
- A financial management system that meets the Federal standards outlined in 24 CFR 84.21.
- A history of serving the community in which the HOME project is to be located for a minimum of one year.
- A clearly defined geographic service area outlined in its Articles of Incorporation and/or Bylaws.
- A purpose to provide decent, safe, and affordable housing to low-income and moderate-income persons, as evidenced in its charter, articles of incorporation, resolutions or by-laws.

The evaluation of an organization's capacity is closely connected to the organization's role as an "owner," "developer," and "sponsor" of affordable housing. Those terms are carefully defined in the HOME regulation at §92.300(a)(2)(6) and require that the CHDO be solely in charge of the proposed project. Eligible activities include acquisition, rehabilitation, and/or construction of new housing. Ineligible activities include rehabilitation of owner-occupied properties, tenant-based rental assistance, and direct homebuyer assistance.

Please complete the following application and include all required attachments and documents for consideration.

This information is intended to accompany an application for project funding and, alone, does not provide all information needed to evaluate and underwrite the project itself.



APPLICATION FOR COMMUNITY HOUSING DEVELOPMENT ORGANIZATION (CHDO) CERTIFICATION

Current active and prospective CHDOs should complete Sections 1-4 of this application, sign the certification in Section 5, and provide all applicable required attachments in Section 6. For any required attachment not being submitted, provide an explanation as to why the attachment is not applicable to your organization.

SECTION 1: ORGANIZATION & KEY CONTACTS

| | |
|--|---------------------|
| 1. ORGANIZATION NAME: | |
| 2. MAILING ADDRESS (INCLUDE PHYSICAL ADDRESS IF DIFFERENT FROM MAILING ADDRESS): | 3. TAX ID NUMBER: |
| | 4. SAMS UEI NUMBER: |
| PROVIDE NAME, TITLE, AND CONTACT INFORMATION (PHONE AND EMAIL) FOR #5-7: | |
| 5. ORGANIZATION PRESIDENT/CEO/EXECUTIVE DIRECTOR: | |
| 6. APPLICATION CONTACT PERSON (IF DIFFERENT THAN PRESIDENT/EXECUTIVE DIRECTOR): | |
| 7. BOARD PRESIDENT (PROVIDE PERSONAL CELL PHONE AND EMAIL ADDRESS, NOT ADDRESS OF ORGANIZATION): | |
| 8. THIS APPLICATION IS BEING SUBMITTED IN CONJUNCTION WITH AN APPLICATION FOR: | |
| <input type="checkbox"/> Project funding from the CHDO Set-aside | |

SECTION 2: CHDO ROLE & PROJECT INFORMATION

1. **CHDO ROLE**—Indicate the prospective CHDO's role in the proposed project and then complete the corresponding CHDO Role Checklist which must be provided as an attachment to this application.

The prospective CHDO will act as the (*choose only one*):

- ☐ **Owner** of rental housing
- ☐ **Developer** of rental housing
- ☒ **Sponsor** of rental housing—CHDO Affiliate will act as Owner
- ☒ **Sponsor** of rental housing—CHDO Affiliate will act as Developer
- ☒ **Sponsor** of rental housing—Turnkey Sponsor

2. **PROJECT LOCATION**—Identify the Municipality in which the proposed project is located and, include the site address (if known) or major cross streets (e.g. northeast corner of 2nd Avenue and Oak Street or south side of 200 block of East Sunset Lane):

3. **PROJECT DESCRIPTION**—Provide a brief description of the project including whether it involves rental or for-sale housing, new construction or rehabilitation. Also describe the overall size, number of structures/building type, income restrictions, population(s) served (e.g. family, senior, special needs, etc.), and other key information.

SECTION 3: CHDO DEFINITION

In this section, the applicant should indicate which attached document(s) provide evidence for specific threshold criteria. Additionally, the applicant should indicate where in the attached document applicable provision can be found. Finally, as appropriate, highlight the relevant sections of each document. For example:

| | |
|---|--|
| Criterion Met: <input type="checkbox"/> Yes <input type="checkbox"/> No <i>This box for PJ (COUNTY) Use Only</i> | Documentation submitted to demonstrate this item: <input type="checkbox"/> Articles of Incorporation/Charter; <input type="checkbox"/> By-laws (See pg. ____ of By-laws for board member requirements); OR <input type="checkbox"/> Resolutions |
|---|--|

PART A: LEGAL STATUS**1. ORGANIZATION—The nonprofit organization is organized under State or local laws [§92.2 CHDO definition paragraph (1)]**

| | |
|--|--|
| PJ Determination Criterion Met: <input type="checkbox"/> Yes <input type="checkbox"/> No | Documentation submitted to demonstrate this item: <input type="checkbox"/> Certificate of Good Standing (if the organization is newly formed and has been existence for less than one year, a Certificate of Existence will suffice) AND one or more of the following: <input type="checkbox"/> Articles of Incorporation/Charter <input type="checkbox"/> Other: _____ |
|--|--|

PJ Review Notes:

2. PURPOSE—The organization must have among its purposes the provision of decent housing that is affordable to low- and moderate-income people [§92.2 CHDO definition paragraph (7)]

| | |
|--|---|
| PJ Determination Criterion Met: <input type="checkbox"/> Yes <input type="checkbox"/> No | Documentation submitted to demonstrate this item: <input type="checkbox"/> Articles of Incorporation/Charter <input type="checkbox"/> By-laws; OR <input type="checkbox"/> Resolutions |
|--|---|

PJ Review Notes:

3. EARNINGS—No part of the organization's net earnings may inure to the benefit of any member, founder, contributor, or individual [§92.2 CHDO definition paragraph (2)]

| | |
|--|---|
| PJ Determination Criterion Met: <input type="checkbox"/> Yes <input type="checkbox"/> No | Documentation submitted to demonstrate this item: <input type="checkbox"/> Articles of Incorporation/Charter |
|--|---|

PJ Review Notes:

4. STRUCTURE—The organization may not be controlled by, nor under the direction of, individuals or entities seeking to derive profit or gain from the organization [§92.2 CHDO definition paragraph (3)]

PJ Determination

Criterion Met:

☐ Yes ☐ No

Documentation submitted to demonstrate this item:

☐ Articles of Incorporation/Charter☐ By-laws; OR☐ A Memorandum of Understanding (MOU) with any “parent” organization.

PJ Review Notes:

5. NON-PROFIT STATUS—The organization must be a recognized nonprofit by virtue of:**a. Having a tax exemption ruling from the Internal Revenue Service (IRS) under Section 501(c)(3) or 501(c)(4) of the Internal Revenue Code of 1986; OR****b. Is classified as a subordinate of a central organization non-profit under section 905 of the Internal Revenue Code; OR****c. Is a wholly-owned entity that is a disregarded entity separate from its owner for tax purposes and is owned by entity with a tax exemption ruling from the IRS under Section 501(c)(3) or 501(c)(4).****[§92.2 CHDO definition paragraph (4)]**

PJ Determination

Criterion Met:

☐ Yes ☐ No

Documentation submitted to demonstrate this item:

❖ 501(c)(3) or (4) ruling or current conditional designation from the IRS; or

❖ A group exemption letter from the IRS under Section 905 that includes the organization.

PJ Review Notes:

6. NON-PROFIT STATUS—The organization may not be a governmental entity such as a participating jurisdiction, other jurisdiction, Indian tribe, public housing agency, Indian housing authority, housing finance agency, redevelopment authority, zoning board or commission [§92.2 CHDO definition paragraph (5)]

PJ Determination

Criterion Met:

☐ Yes ☐ No

Documentation submitted to demonstrate this item:

❖ Articles of Incorporation/Charter

PJ Review Notes:

PART B: INDEPENDENCE**7. BOARD STRUCTURE—No more than one-third of the governing board members may be public officials or employees of a governmental entity [§92.2 CHDO definition paragraph (5)]**

PJ Determination

Criterion Met:

☐ Yes ☐ No

Documentation submitted to demonstrate this item:

- ❖ By-laws, OR
- ❖ Articles of Incorporation/Charter, **AND**
- ❖ Current Board Roster indicating which members, if any, are public officials or employees of government entities

PJ Review Notes:

8. BOARD/EMPLOYEE ROLES—The officers (including elected or appointed officials) or employees of a governmental entity may not be employees of a CHDO. [§92.2 CHDO definition paragraph (5)]

PJ Determination

Criterion Met:

☐ Yes ☐ No

Documentation submitted to demonstrate this item:

- ❖ By-laws, OR
- ❖ Articles of Incorporation/Charter
- ❖ Other: _____; **AND**
- ❖ CHDO Staff Roster

PJ Review Notes:

9. BOARD MEMBERSHIP—If the organization was created by a governmental entity provided:

- a. The governmental entity may not appoint more than one-third of the membership of the organization's governing body; and
- b. The board members appointed by the governmental entity may not, in turn, appoint the remaining two-thirds of the board members. [§92.2 CHDO definition paragraph (5)]

PJ Determination

Criterion Met:

❖ Not applicable, organization not created by a gov't entity

☐ Yes ☐ No

Documentation submitted to demonstrate this item:

- ❖ Organization [] was [] was not created by a governmental entity as evidenced by:
- ❖ By-laws,
- ❖ Articles of Incorporation/Charter, **AND**
- ❖ Current Board Roster indicating which members, if any, are public officials or employees of government entities along with certifications from all board members as to government official/employee status

PJ Review Notes:

10. A CHDO may be sponsored or created by a for-profit entity, provided that:

- a. The for-profit entity may not appoint more than one-third of the membership of the CHDO's governing body, and
- b. The board members appointed by the for-profit entity may not, in turn, appoint the remaining two-thirds of the board members
- c. The officers or employees of the sponsoring for-profit entity may not be employees of a CHDO.

[§92.2 CHDO definition paragraph 3(i) and (ii)]

PJ Determination

Criterion Met:

Not applicable, organization not created by a for-profit

☐ Yes ☐ No

Documentation submitted to demonstrate this item:

- ❖ Organization [] was [] was not created by a for-profit entity as evidenced by:
- ❖ By-laws,
- ❖ Articles of Incorporation/Charter, **AND**
- ❖ Current Board Roster indicating which members, if any, are appointed by a for-profit parent entity

PJ Review Notes:

11. A CHDO may be sponsored or created by a for-profit entity, however, the for-profit entity's primary purpose does not include the development or management of housing AND the CHDO is free to contract for goods and services from vendor(s) of its own choosing [§92.2 CHDO definition paragraph (3)(i) and (iii)]

PJ Determination

Criterion Met:

❖ Not applicable, organization not created by a for-profit

☐ Yes ☐ No

Documentation submitted to demonstrate this item:

- ❖ Organization [] was [] was not created by a for-profit entity.
If organization was created by a for-profit entity, provide:
- ❖ For-profit organization profile and Articles/By-laws
- ❖ CHDO's By-laws,
- ❖ Articles of Incorporation/Charter, or
- ❖ Other: _____

PJ Review Notes:

PART C: ACCOUNTABILITY TO LOW INCOME COMMUNITY

12. SERVICE AREA—The organization must have a designated service area (i.e. the “community” in which it produces housing). A community can be a neighborhood or neighborhoods, city, county, metropolitan area, or multi-county area (but not the entire State). [§92.2 CHDO definition paragraph (8)(i)]

PJ Determination

Criterion Met:

☐ Yes ☐ No

Documentation submitted to demonstrate this item:

- ❖ By-Laws,
- ❖ Articles of Incorporation/Charter, OR
- ❖ Board Resolution
- ❖ Other: _____; **AND**
- ❖ Map/description of service area

PJ Review Notes:

13. LOW-INCOME BOARD MEMBERSHIP—The organization must maintain at least one-third of its governing board's membership for residents of low- income neighborhoods, other low-income community residents, or elected representatives of low-income neighborhood organizations [§92.2 CHDO definition paragraph (8)(i)]

PJ Determination

Criterion Met:

☐ Yes ☐ No

Documentation submitted to demonstrate this item:

- ❖ By-Laws,
- ❖ Articles of Incorporation/Charter, **AND**
- ❖ Current Board Roster indicating which members meet this criterion along with documentation of each such board member's qualification (e.g. certification of low-income status, documentation of home address in low-income community, or appointment by low-income neighborhood organization)

PJ Review Notes:

14. LOW-INCOME ADVISEMENT—The organization must have a formally adopted process for low income program beneficiaries to advise the organization in all of its decisions regarding the development and management of affordable housing projects [§92.2 CHDO definition paragraph (8)(ii)]

PJ Determination

Criterion Met:

☐ Yes ☐ No

Documentation submitted to demonstrate this item:

- By-laws, OR
- ✎ Resolutions, OR
- ✎ A written statement of operating procedures approved by the governing body, **AND**
- ✎ Statement signed by the president or chief executive officer describing input sought and received on the current project proposal
- ✎ Other: _____

PJ Review Notes:

15. COMMUNITY SERVICE—The organization must have a history of serving the community within which housing to be assisted with HOME funds is to be located [§92.2 CHDO definition paragraph (10)]

The CHDO or its parent organization must be able to show one year of serving the community prior to the date the PJ provides HOME funds to the organization. The organization must describe its history (or its parent organization's history) of serving the community by describing activities which it provided (or its parent organization provided), such as, developing new housing, rehabilitating existing stock and managing housing stock, or delivering non-housing services that have had lasting benefits for the community, such as counseling, food relief, or childcare facilities. The statement must be signed by the president or other official of the organization.

PJ Determination

Criterion Met:

☐ Yes ☐ No

Documentation submitted to demonstrate this item:

A statement that documents at least one year of experience in serving the community by the organization, or if newly formed, by the organization's nonprofit parent organization

Other: _____

PJ Review Notes:

PART D: CAPACITY**16. FINANCIAL ACCOUNTABILITY—The organization must conform to the financial accountability standards of 2 CFR 200.302 and 200.303 [§92.2 CHDO definition paragraph (6)]**

PJ Determination

Criterion Met:

☐ Yes ☐ No

Documentation submitted to demonstrate this item:

✓ A notarized statement by the president or chief financial officer of the organization;

✓ A certification from a Certified Public Accountant, OR

✓ A HUD approved audit summary.

PJ Review Notes:

17. CAPACITY TO UNDERTAKE PROJECT —The organization must have demonstrated capacity appropriate to the organization's role under §92.300 and to the nature of the proposed or anticipated project. This capacity must be satisfied by having paid employees with housing experience appropriate to the project or, for the first year of funding as a CHDO, by having a qualified consultant who will train the organization's paid employees. [§92.2 CHDO definition paragraph (9)]

PJ Determination

Criterion Met:

☐ Yes ☐ No

Documentation submitted to demonstrate this item:

✓ Project description from proposal/application

✓ CHDO Staff Roster, with attachments of:

✓ Resumes/description of experience for staff assigned to development project

✓ Include W-2s for identified staff, or in the absence of W-2s, copies of the employment contract between the CHDO and the employee (Social Security No. may be blacked out.)

PJ Review Notes:

SECTION 4: CERTIFICATION

As the Board President of the organization named in Section 1 of this application or recertification for CHDO Certification, I hereby certify that all the information contained in this application is true and correct and that accurate versions of required attachments have been provided as part of this application.

I acknowledge that submission of materially false or misleading information is grounds for rejection of this application and any related project funding application. Further, I certify that the submission of this application has been approved by a two-thirds vote of the Board of Directors.

SIGNATURE:

DATE:

PRINTED NAME:

SECTION 5: PJ PRELIMINARY DETERMINATION*****THIS SECTION FOR PJ USE ONLY*******PJ DETERMINATION:**

- ❖ The organization meets initial CHDO Threshold requirements, including the capacity requirement as demonstrated by the application and associated attachments,
- ❖ The organization will not be preliminarily designated as a CHDO at this time for the following reasons:
 - The organization has failed to meet and/or document compliance with the threshold criteria as indicated in the notes below and/or
 - Staff does not have the necessary capacity given the project proposed by the organization.

Other Notes:

SIGNATURE OF PJ HOME ADMINISTRATOR:

DATE:

SECTION 6: REQUIRED ATTACHMENTS

Required attachments should be labeled with cover sheets. As noted in instructions to Section 3 above, key sections of Articles, Bylaws, or other documents that highlight specific CHDO definitional elements should also be highlighted in the attachments.

- C-1. Articles of Incorporation/Charter
- C-2. Current Bylaws
- C-3. Certificate of Good Standing or Existence (issued not less than 60 days prior to application)
- C-4. IRS Nonprofit Designation letter
- C-5. Map and Description of Service Area
- C-6. Current Board Roster must indicate LI representatives and public official/employee status
- C-7. Board Member Certifications of Governmental Official/Employer Status
- C-8. Board Member Certifications of Low Income Representation Status
- C-9. Corporate profile of for-profit entity that created organization (if applicable)
- C-10. Adopted policy (e.g. board resolution) defining process for Low Income Beneficiary Input
- C-11. Statement outlining results of input process, including documentation such as notes/minutes/reports of input received on proposed project(s)
- C-12. Corporate profile for prospective CHDO describing at least one-year history of providing service within the organization's service area; regional organizations should highlight service history in the specific local community where proposed CHDO project is located
- C-13. CHDO Staff Roster
- C-14. W-2s for staff assigned to proposed project
- C-15. Resumes/biographies for staff assigned to proposed CHDO project
- C-16. Job descriptions for key staff positions responsible for proposed CHDO project
- C-17. 2 CFR 200.302 and 200.303 Financial Standards Certification/Documentation
- C-18. Current fiscal year operating budget
- C-19. Most recent IRS Form 990
- C-20. Strategic business plan, including description of ongoing and pipeline projects
- C-21. Description of previous HOME funded CHDO projects, including any funded by other PJs
- C-22. Other: _____
- C-23. Other: _____

PUBLIC NEEDS HEARINGS



PUBLIC NEEDS HEARING # 1 & 2



Proof of Publication Notice in the *Morning Call*

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

Sold To:

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

Bill To:

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

STATE OF PENNSYLVANIA)
COUNTY OF LEHIGH) SS:

Timothy Titus

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

Mar 11, 2023.

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

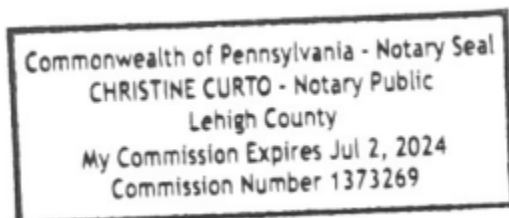


Designated Agent, THE MORNING CALL, LLC.

Sworn to and subscribed before me on this 12 day of March, 2023



Notary Public



Order # - 7396562

Proof of Publication Notice in the *Morning Call*

LEHIGH COUNTY,
PENNSYLVANIA
FY 2023 COMMUNITY
DEVELOPMENT BLOCK GRANT
(CDBG)
PUBLIC HEARING NOTICE AND
REQUESTS FOR PROPOSALS
FROM NON-PROFITS AND
MUNICIPAL AGENCIES

Notice is hereby given by Lehigh County, PA that it will hold public hearings on March 23, 2023 at 3:00 pm, via Zoom, and March 28, 2023 at 10:00 am, prevailing time in Room 225 of the Lehigh County Government Center, 17 South 7th Street, Allentown, PA. To participate in the public hearing on March 23, 2023, please email Cyndi King, or call (610) 782-3565. If special arrangements need to be made to accommodate citizens in order for them to participate in the public hearings, please call the Office of Community Development, at (610) 782-3565 (PA Relay Center TDD, 7-1-1) to make those arrangements.

The purpose of the public hearings is to discuss the County's Community Development Block Grant (CDBG) and HOME Programs, and the community development, housing, and economic development needs of Lehigh County. The County will afford non-profits, housing developers, municipal jurisdictions and public service agencies the opportunity to request funds for projects and activities. This information will be utilized by the County in its preparation of the FY 2023 Annual Action Plan. The actual allocation of funds that Lehigh County is eligible to receive is not known at this time since it has not been determined by HUD. It is anticipated that the FY 2023 allocations will be comparable to FY 2022. In FY 2022, Lehigh County received \$1,229,243 in CDBG funds and \$569,699 in HOME funds. In order to receive funds, Lehigh County must prepare a One Year Annual Action Plan for the use of the funding. At least 70% of the CDBG funds must benefit low- and moderate-income persons. The County intends to afford citizens, local agencies, and interested parties the opportunity to become involved in the planning process. Persons, organizations, or municipalities that wish to request funding should obtain a copy of the request for funding applications which can be found at <https://www.lehighcounty.org/Departments/Community->

Proof of Publication Notice in the *Morning Call*

Economic-Development.
Applications must be received
by April 17, 2023 via email to
cyndiking@lehighcounty.org,
or via mail (postmark deadline
of April 17, 2023) to the Lehigh
County Office of Community
Development, Government
Center, Room 519, 17 South 7th
Street, Allentown, PA 18101.

All interested persons are
encouraged to attend the public
hearings and to present oral or
written testimony concerning the
needs of Lehigh County residents
and the use of CDBG and
HOME funds over the next fiscal
year. Written comments may
be addressed to lauriemoyer@
lehighcounty.org or given by
telephone, (610) 871-1964.
7396562 3/11/2023

Order # - 7396562

PUBLIC HEARING 1 and APPLICATION WORKSHOP

March 2023

Lehigh County
Department of Community &
Economic Development

Frank Kane, Director



Agenda

- Introductions
- Purpose of the Public Hearings
- Anticipated Funding
 - Annual Plan Schedule
- Application & Evaluation Process
 - Consolidated Plan Goals
 - Scoring for CDBG
- Funding Overview
 - Eligible Activities for HOME
 - Detailed overview of HOME with project discussion - upcoming Zoom
 - CDBG Overview
 - Eligible Activities
 - National Objectives
- Grant Requirements
- Q & A and Comments on Lehigh County's CDBG Program



Meet the Team

- Department Director – Frank Kane
- Grants & Management Specialist – Laurie Moyer
- Grants and Projects Manager – George Samuelson
- Executive Assistant – Cyndi King



INTRODUCTIONS



PUBLIC HEARINGS - PURPOSE



Public Hearings

- The purpose of the public hearings:
- Collect comments from citizens, municipalities, and public service providers on the needs of LMI individuals and communities in Lehigh County, and how CDBG and HOME can help.
- Discuss the application process, including eligibility and fundability.
- Bring awareness of administration requirements to potential applicants.



ANTICIPATED FUNDING



Anticipated Funding

- The County receives “entitlement” funding from the U.S. Dept. of HUD on an annual basis.
- Community Development Block Grant (CDBG): \$1,247,023
- As of FY 2022, Lehigh County is also a “PJ”
 - HOME Investment Partnerships (HOME): \$574,620
- CDBG-CV 1 & 3: \$2,025,770 (\$300,000 remains)



Annual Plan Schedule – FY 2023

• Process Timeline

- Application Deadline: April 17, 2023
- Internal Staff Review and Questions to Applicants
- Awards to be Determined by June 7th
- 30 Day Comment Period begins July 1st
- Public Hearing July 11th in Room 225
- Annual Plan Submitted to HUD by August 15, 2023
- HUD Review of Action Plan: +/- 45 Days
- HUD Release of Funds

Program Year: October 1, 2023 thru September 30, 2024



APPLICATION & EVALUATION PROCESS



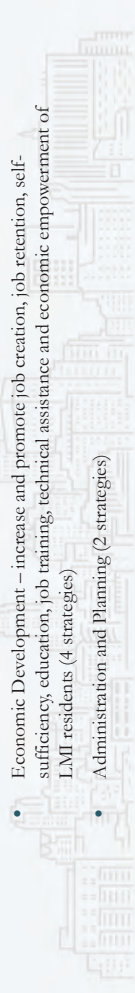
Application Process

- Application forms for grants can be found at:
<https://www.lehighcounty.org/Departments/Community-Economic-Development/Grant-Programs>
- Lehigh County solicits proposals for federally-funded initiatives in accordance with identified priorities & needs, and are awarded on a competitive basis.



Consolidated Plan Goals

- Projects must fit into a goal and a strategy
 - <https://www.lehighcounty.org/Departments/Community-Economic-Development/CDBG-Grant-Application>
- Find the list on the left of the page
 - “FY 2019-2023 Consolidated Plan Goals”
 - CDBG Goals
 - Housing – improve, preserve, and expand affordable housing supply (7 strategies)
 - Homeless – improve living conditions and services for the homeless (3 strategies)
 - Other Special Needs – improve, preserve, and expand facilities for persons with special needs and the disabled (3 strategies)
 - Community Development – improve, preserve, and create new public and community facilities, infrastructure, and public services (7 strategies)
 - Economic Development – increase and promote job creation, job retention, self-sufficiency, education, job training, technical assistance and economic empowerment of LMI residents (4 strategies)
 - Administration and Planning (2 strategies)



Consolidated Plan Goals

- HOME – 1 Goal
 - Housing – improve, preserve, and expand affordable housing supply (7 strategies)
- Home Ownership
 - Mixed Income Housing
 - Housing Rehabilitation
 - Housing Construction
 - Revitalization
 - Fair Housing
 - Housing Support

CDBG – Eligible Activities

Public Service Eligibility Worksheet

- Was this project funded via 2022 CDBG?
 - ☐ Yes – go to Question 2.
 - ☐ No – go to Question 3.
- Are you requesting the same amount (or less than) the amount awarded via 2022 CDBG for the same project?
 - ☐ Yes – skip the rest of this Public Service Project Worksheet section. (The Public Service eligibility requirements have been met.)
 - ☐ No – go to question 3.
- Is this a new project being offered by your agency?
 - ☐ Yes - skip the rest of this Public Service Project Worksheet section. (The Public Service eligibility requirements have been met.)
 - ☐ No – go to question 4.
- Are you able to prove a quantifiable increase in need over the past 12 months, enabling the proposed project to be funded?
 - ☐ Yes – go to question 5.
 - ☐ No – If the project was funded via 2022 CDBG, the project can only request the same amount as previously awarded. If the project is not new, and did not receive 2022 CDBG, then the project is ineligible. (Stop here – and do not submit an application.)
- Please describe the need for the project 12 months ago vs. the current need. Also, describe how the quantifiable data was collected. Qualitative support will not be accepted. If only qualitative support exists, stop here; do not submit an application.

Scoring Criteria - CDBG Applications

Construction Projects

- Projects located in a low- to moderate-income (LMI) municipality will receive priority consideration for funding. Municipalities designated as LMI are Catsauqua, Coplay, Hanover, Fountain Hill, Macungie, and Slatington. The percent of LMI individuals living within the census block groups of these municipalities averages at least 38.29%.
 - Projects must meet one of Lehigh County's Five-Year Consolidated Plan goals.
- Consideration will also be given to projects not located in an LMI community. Such projects should meet the following criteria:
 - Ability of the new project to be completed between January 1, 2024 and August 31, 2024.
 - Applicability to Lehigh County's Five-Year Consolidated Plan goals.
 - Hard cost match of 10% of request is dedicated by the applicant to completing project construction.
 - CDBG request doesn't exceed \$125,000.

Public Services

- Projects not funded via FY 2022: applications will be accepted for new or existing services. Applications for existing services must prove at least a 40% **quantifiable** increase in the need for the service over the past 12 months.
 - On the CDBG application webpage, there are examples illustrating public services and quantifiable increase in need. Please reference this page, entitled "Quantifiable Increase for Public Services" for details on satisfying the documentation requirements.
- Projects funded via FY 2022 and asking for an increase in funding must provide data proving that there was at least a 40% quantifiable increase in the need for services over the past 12 months.
- Projects funded via FY 2022 and not asking for an increase in funding do not need to prove an increase in need.
- All projects must fit into Lehigh County's Five-Year Consolidated Plan goals and substantiate the ability to spend down the requested amount between October 1, 2023 and September 31, 2024.

FUNDING OVERVIEW

HOME Investment Partnerships

Eligible HOME Activities and Costs:

- **Hard Costs**
 - New construction of affordable housing
 - Rehabilitation of affordable housing
 - Reconstruction of affordable housing
 - Conversion to affordable housing
 - Site Improvements related to the development of affordable housing
- **Refinancing of existing debt secured by a housing project that is being rehabilitated w/ HOME Funds**
- **Acquisition Costs** – Improved or unimproved
 - Purchase of property by home buyers

HOME Investment Partnerships

Eligible HOME Activities and Costs Continued:

- **Soft Costs necessary for the financing, development, rehabilitation or acquisition of housing using HOME Funds**
 - Architectural, engineering, and related professional services
- **Community Housing Development Organization (CHDO) Costs**
- **Relocation costs for displaced households**
- **Administrative and planning costs**

HOME Investment Partnerships

Eligible HOME Activities and Costs Continued:

- **Other Costs**
 - Fair housing activities to affirmatively further fair housing
 - Downpayment and closing cost assistance
 - Indirect costs as part of a cost allocation plan
 - Preparation of the consolidated plan
 - Compliance and reporting in reference to Federal requirements
 - Tenant-based rental assistance (TBRA)
 - Rental assistance and security deposit payments
 - Utility deposit assistance only if rental or security deposit payments are made
 - Cost of inspecting the housing and determining income eligibility of the household

HOME Investment Partnerships

Ineligible HOME Activities:

- Provide project reserve accounts, except for new construction or rehabilitation of an initial operating deficit reserve during the period of project read-up (not to exceed 18 months)
- Provide tenant-based rental assistance for the special purpose of the existing Section 8 Program
- Provide non-Federal matching contribution required under another Federal Programs
- Provide assistance for uses authorized by Public Housing Capital and Operating Funds
- Prepayment of Low Income Housing Mortgages
- Provide assistance to a homebuyer to acquire housing previously assisted with HOME funds during the period of affordability
- Provide funds for the acquisition of property owned by the participating jurisdiction (P.J.) except for property acquired by the P.J. with HOME funds, or property acquired in anticipation of carrying out a HOME project
- Pay for delinquent taxes, fees or charges on properties to be assisted with HOME funds

CDBG - Overview

HUD Funding – Resources

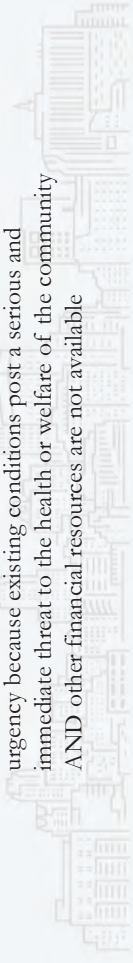
- CDBG Guide to National Objectives & Eligible Activities:
 - https://www.hudexchange.info/resources/documents/CDBG_Guide_National_Objectives_Eligible_Activities.pdf
- Playing by the Rules: A Handbook for CDBG Subrecipients on Administrative Systems:
 - http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_17104.pdf
- Managing CDBG: A Guidebook for Grantees on Subrecipient Oversight:
 - https://portal.hud.gov/hudportal/documents/huddoc?id=DOC_17086.pdf



CDBG - Overview

National Objectives of the CDBG Program

1. Benefit low- and moderate-income (LMI) persons
 - Minimum 70% of allocation annually
 - Determined by area (census block group or household surveys)
 - Limited Clientele – at least 51% of households served were documented as LMI
 - LMI Household – the individual household is documented as LMI
 - LMI Jobs – an LMI individual holds or will be placed in a job
2. Prevent or eliminate slums or blight
 - Spot or area blight
3. Meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community AND other financial resources are not available



CDBG - Overview

- **History:** CDBG funded via Title I of Housing & Community Development Act of 1974.
- **Primary Purpose:**
 - Provide Quality Affordable Housing
 - Create Suitable Living Environments
 - Expand Economic Opportunities



CDBG - Overview

- **Eligible Activities:**
 - Projects must benefit those living in Lehigh County but outside the cities of Allentown and Bethlehem, as well as Lower Milford Township.
 - CDBG can support a variety of project types
 - Most activities that benefit low- and moderate-income individuals and meet the needs of the community are eligible; **however, the regulations make funding complicated to use.**



CDBG - Overview

- **Primary Eligibility Categories**

- Public Service – maximum of 15% of net allocation
- Public Facility or Infrastructure Improvements
- Affordable Housing

CDBG – Eligible Activities

Public Services:

Direct, quantifiable social service delivery to eligible clients.

Activities eligible under this category include (but are not limited to):

- Job Training
- Child Care
- Health Services
- Senior Services
- Afterschool Programs
- Homeless Services
- Domestic Violence Prevention
- Legal Services
- Housing Counseling
- Food Banks

CDBG – Eligible Activities

Public Facility Improvements - improvements to publicly-owned facilities and infrastructure such as streets, playgrounds, and underground utilities, and buildings owned by non-profits that are open to the general public.

Activities eligible under this category include (but are not limited to):

- Rehabilitation or construction of a neighborhood community center
- Rehabilitation or construction of a homeless shelter
- Rehabilitation or construction of facilities serving persons with disabilities
- Improvements to public libraries
- ADA modifications
- Installation of broadband infrastructure
- Housing Authority improvements

CDBG – Eligible Activities

Housing: activities to foster safe, affordable housing opportunities for low/moderate income households.

Activities eligible include:

- Housing rehabilitation programs
- Energy efficiency & weatherization programs
- Conversion of closed buildings to residential use
- Rehabilitation of housing for rent or sale
- Acquisition & site improvements for housing

CDBG – Eligible Activities

Other Eligible Activities

- **Economic Development:** activities to foster economic opportunity, including microenterprise and small business development, commercial and industrial development, and job creation, job retention, and job training activities.
 - Technical assistance and workshops for small businesses
 - Grant programs for small businesses
 - Façade improvement programs
 - Lending programs to for-profits
- **Real Property**
 - Acquisition – fundability based on reuse of property
 - Relocation – expenses to relocate residents during a project
 - Demolition
- **Administration & Planning**

CDBG – “Low/Mod”

- “Low and Moderate Income” (LMI) means a family or household with an annual income less than 80 percent of the area median income.
- Income Limits for CDBG are updated annually. Subrecipients are responsible for ensuring they use the current income limit to capture beneficiary data.

| FY 2022 Income Limit Area | Median Family Income Click for More Detail | FY 2022 Income Limit Category | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 |
|--|---|--|--------|--------|--------|---------------|--------|--------|--------|--------|
| Allentown-Bethlehem-Easton, PA HUD Metro FMR Area | \$90,600 | Very Low (50%) Income Limits (\$) Click for More Detail | 31,750 | 36,250 | 40,800 | 45,300 | 48,950 | 52,550 | 56,200 | 59,800 |
| | | Extremely Low Income Limits (\$)* Click for More Detail | 19,050 | 21,800 | 24,500 | 27,750 | 32,470 | 37,190 | 41,910 | 46,630 |
| | | Low (80%) Income Limits (\$) Click for More Detail | 50,750 | 58,000 | 65,250 | 72,500 | 78,300 | 84,100 | 89,900 | 95,700 |
| | | | | | | | | | | |

– <http://www.huduser.org/portal/datasets/il.html>

CDBG – National Objective

- **Low/Mod Area Benefit (LMA)**
 - Activities must be open to and benefit all residents of the area
 - Agency must determine service area of activity
 - Area must be primarily residential
 - At least 38.29% of project beneficiaries must be LMI; determined by Census block group or household surveys
 - Activity Examples:
 - Street Reconstruction (not resurfacing)
 - Neighborhood cleanups
 - Water/sewer improvements
 - Creation of a neighborhood park

CDBG – National Objective

- **Low/Mod Limited Clientele (LMC):**
 - Activities benefit specific populations of clients
 - Agencies must document that at least 51% of participants are Low/Mod individuals
 - Income Certification/Intake Form
 - Activity Examples:
 - Subsistence Services – max 3 months of rent/utilities
 - Legal services
 - Workforce training for the formerly incarcerated
 - Microenterprise technical assistance programs

CDBG – National Objective

- **Limited Clientele Presumed Benefit (LMPB):**
 - Activities benefit specific population groups that are presumed to be LMI:
 - Senior Citizens (62+)
 - Homeless Individuals/Families
 - Child in DCYF Custody
 - Severely Disabled Adults
 - Person with HIV/AIDS
 - Victims of Domestic Violence
 - Migrant Farm Workers
 - Note: Presumed benefit relates **only** to income.
 - Data regarding race, ethnicity, gender, disability status, veteran status, and the total number of unduplicated clients served in the program **must still comply with HUD regulations.**

CDBG – National Objective

- **Low/Mod Housing (LMH):**
 - Activities to acquire, construct, or improve permanent, residential structures which are/will be occupied by LMI persons.
 - Typical activities:
 - Acquisition of property to be used for permanent housing
 - Rehabilitation of permanent housing, rental or owner-occupied
 - Conversion of nonresidential structures into permanent housing
 - Assistance to a household to enable it to acquire ownership of a home (homeownership assistance).

CDBG – National Objective

- **Low/Mod Job Creation (LMJ):**
 - Activities to generate economic opportunities
 - Job Creation: Documentation must indicate that at least 51% of the jobs will be held by, or made available to, LMI persons
 - Job Retention: Documentation must indicate that the jobs would have been lost without the CDBG assistance and that at least 51% of the jobs are held by LMI persons and/or the job can “reasonably be expected” to turn over within the following two years and steps will be taken to ensure that the job will be filled by, or made available to, a LMI person
 - Public Benefit Standard: Create or retain at least one full-time, permanent job per \$35,000 of CDBG funds used
 - Typical activities:
 - Business loans, commercial rehabilitation, business technical assistance

GRANT REQUIREMENTS

Grant Requirements

- Receiving a federal grant through Lehigh County means:
 - Complying with all applicable federal and local requirements
 - Keeping records for at least 5 years after program/project completion
 - Maintaining a strong fiscal management system
 - Agreeing to be monitored by HUD & Lehigh County at any time
 - Submitting timely quarterly and annual reports
 - Complying with contract terms;
- Commitments can be canceled or contracts terminated due to non-compliance.

Grant Requirements

- NEPA Environmental Review:
 - Lehigh County will conduct an Environmental Review and Historic Review of all projects for Subrecipients.
 - NO WORK can start until you have been notified in writing that the Environmental Review is complete
 - After your application has been submitted, DO NOT:
 - Acquire, rehabilitate, convert, repair, begin or continue any construction
 - Solicit bids for the project (but you can get estimates)
 - Enter into a purchase and sale agreement
 - Finalize a closing of sale

Grant Requirements

- Davis Bacon Act:
 - Construction projects >\$2,000 funded in whole or in part with federal funds
 - All laborers and mechanics employed by contractors or subcontractors are to be paid federal prevailing wages
 - May increase cost of project
 - Requires weekly payment of wages
 - Each contractor must:
 - Submit weekly certified payrolls reflecting all hours worked

Grant Requirements

- Lehigh County Grant Ordinance
 - Financial documentation must be submitted at the time of application.
 - Documentation will be placed on Lehigh County's website and removed after processing of the CDBG award ordinance.
- 1. The current and previous fiscal year's budget, including the actual revenues and expenditures for the previous year
- 2. Audited financial statements for the two (2) previous fiscal years
- 3. The positions of all employees, officers and board members who receive \$50,000.00 or more in annual compensation, including bonuses, from the requesting organization
- 4. The total compensation of the organization's five (5) highest compensated individuals
- 5. A list of all funding sources and the total amount received from each funding source for the previous Year
- 6. A list of all funding sources for the current year, and a list of all pending applications for funding, including the amount requested

Grant Requirements

- Procurement:
 - Procurement must comply with local, state, & federal requirements.
 - Non-profits shall follow their agency's formal procurement guidelines. Lehigh County Administrative Code shall be adhered to if an agency doesn't have formal procurement guidelines.
 - Typically a minimum of three written quotes or estimates is required. Sealed bids required on larger projects.
- MBE/WBE:
 - Requires reasonable efforts to be made to solicit bids from and procure goods and services from minority and woman-owned business enterprises for construction contracts in excess of \$25,000.
 - Will require documentation that you actively solicited bids from a minimum number of MBE/WBE firms.

Grant Requirements

- Section 3 of the HUD Act of 1968 – A requirement to ensure that economic opportunities generated by certain HUD assistance is directed to low- and very-low income persons.
 - Applicable to housing rehabilitation, housing construction, and other public construction or demolition projects that are funded with \$200,000 or more of CDBG and/or HOME funding.
 - Requirements apply to the entire project regardless of whether the project is fully or partially funded with HUD funding.
 - Subrecipients must include the [Section 3 clause](#) in their contracts, ensure that the lowest bidder authorizes the affirmative action plan, and also ensure that the contractor meets labor hour benchmarks or demonstrates qualitative efforts attempting to meet the benchmarks.
- Public Service Projects:
 - Failure to submit quarterly or annual reports on a timely basis may result in forfeiture of CDBG award or agency ineligibility for future CDBG funding.
 - Failure to complete the project within 60 days past the close of the program year will result in relinquishment of unused funding.

Grant Requirements

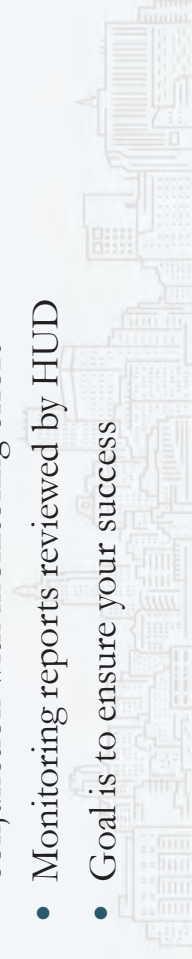
- Payments are made on a reimbursement basis
- Request for Payment requires:
 - Letter Requesting Funds on Signed Letterhead or signed Agency Invoice
 - Based on expenditures outlined in budget; budget is memorialized by contract
 - For salaries – employee timesheets reflecting actual time worked on CDBG-funded project
 - For supplies, equipment, construction services – receipts / copies of invoices and canceled checks to prove payment of those invoices.
- Costs billed to the grant must be reasonable and proportional; need “cost allocation plan” if billing rent or operating expenses, or 10% de minimus of eligible costs.

Grant Requirements

- Expect to retain files for 5+ years after grant close-out.
- Program files should contain:
 - Original executed copy of the agreement with Lehigh County
 - Any amendments to the application and agreement
 - Correspondence relating to the grant award
 - Copies of requests for reimbursement and all supporting documentation
 - Any other information pertinent to the Grant (Intake Forms, Client Income Verifications, income documentation, etc.)
 - Documentation of procurement (if applicable)

Grant Requirements

- Monitoring is not a “one-time” event, it’s ongoing throughout the entire lifespan of the funds
- Review occurs onsite and remotely
- Risk-based approach may be utilized when needed to determine which agencies should be prioritized for monitoring
- Technical assistance may be requested prior to or in conjunction with monitoring effort
- Monitoring reports reviewed by HUD
- Goal is to ensure your success



THANK YOU!



Q & A and Comments

CONTACT US

Laurie Moyer

Grants Management Specialist

lauriemoyer@lehighcounty.org

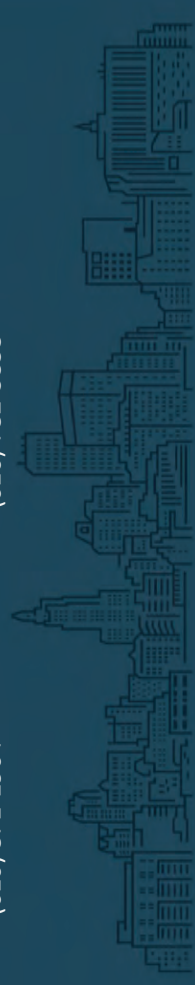
(610) 871-1964

George Samuelson

Grants and Projects Manager

georgesamuelson@lehighcounty.org

(610) 782-3855





ELIGIBLE HOME ACTIVITIES

Eligible HOME Activities and Costs:

- **Hard Costs**
 - New construction of affordable housing
 - Rehabilitation of affordable housing
 - Reconstruction of affordable housing
 - Conversion to affordable housing
 - Site Improvements related to the development of affordable housing
- **Refinancing of existing debt secured by a housing project that is being rehabilitated w/ HOME Funds**
 - Refinancing of debt on a single-family (one to four family) owner occupied housing that is being rehabilitated with HOME funds and the refinancing will reduce the overall monthly housing cost to make it affordable
- **Acquisition Costs**
 - Improved or unimproved
 - Purchase of property by home buyers
- **Soft Costs necessary for the financing, development, rehabilitation or acquisition of housing using HOME Funds**
 - Architectural, engineering, and related professional services
 - Costs to process and settle the financing for a project such as lender origination fees, appraisal fees, etc.
 - Project audit costs and certification of costs by a CPA
 - Costs to provide information services such as affirmative marketing and fair housing information
 - Costs of funding an initial operation deficit reserve during the period of initial project rent-up but not to exceed 18 months
 - Staff and overhead costs directly related to carrying out the project such as work specifications, loan processing inspections, housing consultation, etc.

- Cost for the payment of impact fees that the local jurisdiction changes for all housing projects
- Cost of environmental review and release of funds
- **CHDO Costs**
 - Cost of project-specific technical assistance and site control loans
 - Project feasibility costs, consulting fees, legal fees, architectural and engineering fees, property options, site control, and title clearance
 - Project specific seed money loans for preconstruction costs that are customary and reasonable such as costs of obtaining firm financing, construction loan commitments, architectural plans and specifications, zoning approvals, legal fees, etc.
- **Relocation costs for displaced households**
 - Relocation payments and other relocation assistance for persons displaced by the housing project
 - Replacement housing payments, moving expenses and payment for reasonable out-of-pocket costs incurred in the temporary relocation of persons
 - Other relocation assistance such as staff and overhead costs directly related to providing advisory and other relocation services to displaced persons
- **Administrative and planning costs**
 - General management, oversight and coordination
 - Staff and overhead costs
 - Public information costs in the planning and implementation of projects
- **Other Costs**
 - Fair housing activities to affirmatively further fair housing
 - Downpayment and closing cost assistance
 - Indirect costs as part of a cost allocation plan
 - Preparation of the consolidated plan
 - Compliance and reporting in reference to Federal requirements
 - Tenant-based rental assistance (TBRA)
 - Rental assistance and security deposit payments

- Utility deposit assistance only if rental or security deposit payments are made
- Cost of inspecting the housing and determining income eligibility of the household
- Troubled HOME-assisted rental housing projects
 - Applies to only an existing HOME assisted rental project
 - Project is no longer financially viable during the HOME 20 year affordability period for rental projects
 - Operating costs significantly exceed the operating revenue
 - HUD must approve this cost to preserve an affordable rental project
 - Additional HOME Funds and original HOME Funds may not exceed the maximum amount of per-unit subsidy [Section 221 (d)(3)(ii)]

Ineligible HOME Activities:

- **HOME funds may not be used to:**
 - Provide project reserve accounts, except for new construction or rehabilitation of an initial operating deficit reserve during the period of project read-up (not to exceed 18 months)
 - Provide tenant-based rental assistance for the special purpose of the existing Section 8 Program
 - Provide non-Federal matching contribution required under another Federal Programs
 - Provide assistance for uses authorized by Public Housing Capital and Operating Funds
 - Prepayment of Low Income Housing Mortgages
 - Provide assistance to a homebuyer to acquire housing previously assisted with HOME funds during the period of affordability
 - Provide funds for the acquisition of property owned by the participating jurisdiction (P.J.) except for property acquired by the P.J. with HOME funds, or property acquired in anticipation of carrying out a HOME project
 - Pay for delinquent taxes, fees or charges on properties to be assisted with HOME funds

- Pay for any cost that is not listed as eligible under the HOME Regulations

Citizen Participation Record

Public Hearing #1 – Session #1 - March 23, 2023, 3:00 pm, Zoom

Attendees:

1. Mary Kovalchick, LCCC mkovalchick@lccc.edu
2. Susan Mazza, Catholic Charities smazza@allentowndiocese.org
3. Rain Black, Bradbury Sullivan Ctr. rain@bradburysullivancenter.org
4. Wendy Seiffert, CIS seiffertw@ciseasternpa.org
5. Lee Rackus, Whitehall Twsp. lrackus@whitehalltownship.com
6. Cathy Bonaskiewich, Salisbury Twsp.
cbonaskiewich@salisburytownshipa.org
7. Stephen Nemeth, Alburtis Mgr. snemethboa@ptd.net
8. Jennifer Doyle, The Literacy Ctr. jdoyle@theliteracycenter-lv.org
9. Bob Elbich, Commissioner, BobElbich@lehighcounty.org
10. Mariska Van Aalst, Congresswoman Wild's Office
Mariska.VanAalst@mail.house.gov
11. Ed Cronin, MOW edc@mowglv.org
12. Kate Hartney, GLVCC, kateh@lehighvalleychamber.org
13. George to his home email geosamuelson@gmail.com
14. Jay Duncan, Hispanic American Organization jduncan@hao-lv.org
15. Bajen Njie, Casa Guadalupe bajen.njie@casalv.org
16. Chad Christman, Emerald Playground Assoc. emeraldpga@gmail.com
17. Chris Cassidy, NBM, ccassidy@newbethanyministries.org
18. Julie Shoults, CALV jshoults@caclv.org
19. Kris Chiu, CALV, kchiu@caclv.org
20. Brian Pedersen, LVCIL BrianPedersen@lvcil.org

Comments: None

Public Hearing #1 – Session #2 - March 28, 2023, 10:00 am, Room 225

Attendees: Laurie Moyer, Grants Management Specialist

Comments: None

2ND PUBLIC HEARING



Proof of Publication Notice in the *Morning Call*

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

Sold To:

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

Bill To:

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

**STATE OF PENNSYLVANIA)
COUNTY OF LEHIGH) SS:**

Timothy Titus

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

Jun 29, 2023.

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

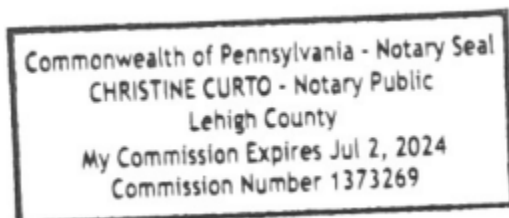


Designated Agent, THE MORNING CALL, LLC.

Sworn to and subscribed before me on this 30 day of June, 2023



Notary Public



Order # - 7454984

Proof of Publication Notice in the *Morning Call*

NOTICE OF PUBLIC HEARING LEHIGH COUNTY, PENNSYLVANIA FY 2023 ANNUAL ACTION PLAN

Notice is hereby given that Lehigh County, Pennsylvania will hold a public hearing on Tuesday, July 11, 2023, at 12:00 p.m., prevailing time, in Room 524 of the Government Center, 17 South Seventh Street, Allentown, PA.

The Government Center and the Public Hearing Room are accessible to persons with physical disabilities. If special arrangements are needed to accommodate residents in order for them to participate in the public hearing, please call Ms. Laurie A. Moyer, Grants & Housing Manager, at (610) 871-1964 or by email at lauriemoyer@lehighcounty.org to make arrangements. Persons with hearing and/or speech impediments may contact Lehigh County through the "Pennsylvania Relay Service" by dialing "7-1-1" or going online to www.parelay.net. If requested, a foreign language and/or sign language interpreter will be provided if the County is notified three (3) days in advance of the meeting.

The purpose of this public hearing is to present the FY 2023 Lehigh County Annual Action Plan which shows the proposed use of the Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) funds. Lehigh County has been notified by the U.S. Department of Housing and Urban Development (HUD) that it is eligible to receive a Federal CDBG allocation of \$1,247,023 and HOME allocation of \$574,620. The FY 2023 Annual Action Plan must be submitted to HUD on or before August 15, 2023, to receive FY 2023 Federal funds.

In order to obtain the views of residents, public agencies and other interested parties, Lehigh County has placed the FY 2023 Annual Action Plan on display from June 30, 2023 through July 31, 2023 at the following locations in Lehigh County, as well as the Lehigh County website <http://www.lehighcounty.org/Departments/Community-Economic-Development>:

- Lehigh County Department of Community and Economic Development
Lehigh County Government Center, 17 South 7 th Street, Allentown, PA 18101
- Catasauqua Public Library - 302 Bridge Street, Catasauqua, PA 18032
- Coplay Library - 49 South 5 th Street, Coplay, PA 18037
- Emmaus Public Library - 11 East Main Street, Emmaus, PA 18049
- Lower Macungie Library - 3400 Brookside Road, Macungie, PA 18062
- Parkland Community Library - 4422 Walbert Avenue, Allentown, PA 18104
- Slatington Library - 650 Main Street, Slatington, PA 18080
- Southern Lehigh Public Library - 3200 Preston Lane, Center Valley, PA 18034
- Whitehall Township Public Library - 3700 Mechanicsville Road, Whitehall, PA 18052

These documents will be available to the public during normal hours of operation for a period of thirty (30) days until July 31, 2023, after which time the FY 2023 Annual Action Plan will be submitted to HUD on or before August 15, 2023, for HUD approval.

The proposed FY 2023 Annual Action Plan was prepared in accordance with the County's Five-Year Consolidated Plan for FY 2019-2023 and after conducting public hearings on the housing and community development needs in Lehigh County.

The County's FY 2023 CDBG Program Year begins October 1, 2023, and ends September 30, 2024.

The County proposes to use the FY 2023 HUD funds it receives as described below, subject to public comments received and the approval by the Lehigh County Board of Commissioners.

Proof of Publication Notice in the *Morning Call*

by the Lehigh County Board of Commissioners:

Summary of FY 2023 Annual Action Plan

| | |
|-------------------------|-----------------|
| FY 2023 CDBG Allocation | \$ 1,247,023.00 |
| FY 2023 HOME Allocation | \$ 574,620.00 |
| Total: | \$ 1,821,643.00 |

FY 2023 CDBG Program Budget:

Lehigh County proposes to undertake the following activities with the FY 2023 CDBG funds:

1. Aspire To Autonomy – Emergency Shelter - \$25,000.00
 2. Communities in Schools of the Lehigh Valley – Career Supports at LCTI - \$25,000.00
 3. Lehigh Valley Center for Independent Living - People Living in Accessible Community Environments (PLACE) Program - \$25,000.00
 4. Manito Life Center -Therapeutic Riding for At-Risk Adolescents - \$25,000.00
 5. Big Brothers Big Sisters – Sports Buddies - \$20,422.00
 6. Catholic Charities – Case Management and Rent Assistance - \$29,220.00
 7. North Penn Legal Services – LMI Legal Help - \$12,000.00
 8. Whitehall Township – Mickley-Prydun Farm - \$170,490.00
 9. Coplay Borough – Fire Equipment - \$59,640.00
 10. Emmaus Borough - Curb Cuts - \$157,550
 11. Slatington Borough - Road Reconstruction on North Street - \$87,399
 12. Slatington Borough - Road Reconstruction on 5 th Street - \$90,898
 13. Whitehall Township - Curb Cuts - \$282,000.00
 14. Administration - \$237,404.00
- Total CDBG: \$1,247,023.00

FY 2023 HOME Program Budget:

Lehigh County proposes to undertake the following activities with the FY 2023 HOME funds:

1. HOME Administration - \$57,462.00
 2. CHDO Set-Aside - \$77,574.00
 3. Affordable Housing Project - \$400,000.00
 4. Affordable Housing Project – TBD - \$39,584.00
- Total HOME: \$574,620.00

All interested residents are encouraged to attend this public hearing and they will be given the opportunity to present oral or written testimony concerning the proposed use of CDBG funds under the FY 2023 Annual Action Plan. Written comments may be addressed to Ms. Laurie A. Moyer, Grants Management Specialist, Government Center, 17 South Seventh Street, Allentown, PA 18101, or by email at lauriemoyer@lehighcounty.org or oral comments may be made by calling (610) 871-1964.

Laurie A Moyer
Grants Management Specialist
Lehigh County
7454984 6/29/23

Order # - 7454984

FY 2023 CDBG and HOME

Citizen Participation

Second Public Comment Period - June 30, 2023 – July 31, 2023

- Comments Received
 - Comment provided by B. Yarber
 - Expressed dissatisfaction related to lack of outreach by DCED staff during the review of his applications, as well as upon determination of final awards. During the month of August, 2023, DCED staff will be in contact with the comment provider to review the application process, as well as discuss the importance of detailed budgets, a targeted request, and compliance with federal regulations. This discussion will better prepare the comment provider to submit a competitive application for 2024 CDBG funding.

Public Hearing - July 11, 2023 at 12:00 pm

Room 524, Lehigh County Government Center

- Attended by Laurie Moyer, Grants Management Specialist
- No comments were received during the public hearing.