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# LEHIGH COUNTY, PENNSYLVANIA

DEPARTMENT OF COMMUNITY & ECONOMIC DEVELOPMENT

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

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## **FY 2019-2023 Five Year Consolidated Plan & FY 2019 Annual Action Plan - Substantial Amendment # 3**

*In Accordance with the HUD Guidelines for the  
Community Development Block Grant Program*

***Amended:  
August 2, 2022***

Frank Kane, Director  
Department of Community and  
Economic Development



## Table of Contents

### PART I. ES: EXECUTIVE SUMMARY

ES-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 .....	2
3.	Evaluation of Past Performance .....	5
4.	Summary of Citizen Participation Process and Consultation Process .....	5
5.	Summary of Public Comments.....	7
6.	Summary of Comments or Views Not Accepted and the Reasons For Not Accepting Them .....	7
7.	Summary .....	7

### PART II. PR: THE PROCESS

PR-05	Lead & Responsible Agencies – 91.200(b) .....	9
1.	Agency/Entity Responsible for Preparing/Administering the Plan .....	9
PR-10	Consultation - 91.100, 91.200(b), 91.215(l).....	10
1.	Introduction .....	10
2.	Agencies, Groups, Organizations, and Others Who Participated in the Process and Consultations .....	12
PR-15	Citizen Participation.....	35
1.	Summary of citizen participation process .....	35

### PART III. NA: NEEDS ASSESSMENT

NA-05	Overview .....	40
NA-10	Housing Needs Assessment - 24 CFR 91.205 (a,b,c) .....	41
1.	Housing Problems .....	42
2.	Housing Problems 2 .....	43

3.	Cost Burden > 30%.....	44
4.	Cost Burden > 50%.....	45
5.	Crowding (More than one person per room) .....	45
NA-15	Disproportionately Greater Need: Housing Problems - 91.205 (b)(2).....	52
NA-20	Disproportionately Greater Need: Severe Housing Problems - 91.205 (b)(2).....	55
NA-25	Disproportionately Greater Need: Housing Cost Burdens - 91.205 (b)(2).....	58
NA-30	Disproportionately Greater Need: Discussion - 91.205 (b)(2) .....	60
NA-35	Public Housing - 91.205 (b) .....	62
NA-40	Homeless Needs Assessment - 91.205 (c) .....	68
NA-45	Non-Homeless Special Needs Assessment - 91.205 (b,d).....	73
NA-50	Non-Housing Community Development Needs - 91.215 (f) .....	76

#### **PART IV. MA: MARKET ANALYSIS**

MA-05	Overview .....	79
MA-10	Number of Housing Units - 91.219 (a) & (b)(2).....	80
MA-15	Housing Market Analysis: Cost of Housing 91.210(a).....	83
MA-20	Housing Market Analysis: Condition of Housing - 91.210(a) .....	87
MA-25	Public and Assisted Housing - 91.210 (b) .....	90
MA-30	Homeless Facilities and Services - 91.210 (c).....	94
MA-35	Special Needs Facilities and Services - 91.210(d) .....	97
MA-40	Barriers to Affordable Housing - 91.210 (e).....	99
MA-45	Non-Housing Community Development Assets - 91.215 (f).....	102
MA-50	Needs and Market Analysis Discussion.....	108

**PART V. SP: STRATEGIC PLAN**

SP-05	Overview .....	110
SP-10	Geographic Priorities - 91.215 (a)(1).....	114
SP-25	Priority Needs - 91.215 (a)(2).....	119
SP-30	Influence of Market Conditions - 91.215 (b).....	126
SP-35	Anticipated Resources - 91.215 (a)(4), 91.220 (c)(1,2) .....	127
SP-40	Institutional Delivery Structure - 91.215 (k) .....	130
SP-45	Goals Summary - 91.215 (a)(4) .....	134
SP-50	Public Housing Accessibility and Involvement - 91.215(c).....	146
SP-55	Barriers to Affordable Housing - 91.215 (h).....	147
SP-60	Homelessness Strategy - 91.215 (d).....	151
SP-65	Lead Based Paint Hazards - 91.215 (i).....	156
SP-70	Anti-Poverty Strategy - 91.215 (j) .....	158
SP-80	Monitoring - 91.230 .....	160

**PART VI. ANNUAL ACTION PLAN**

AP-15	Expected Resources – 91.220(c)(1,2).....	162
AP-20	Annual Goals & Objectives.....	165
AP-35	Projects – 91.220(d) .....	169
AP-38	Project Summary.....	172
AP-50	Geographic Distribution – 91.220(f) .....	181
AP-55	Affordable Housing – 91.220(g) .....	184
AP-60	Public Housing – 91.220(h) .....	185
AP-65	Homeless and Other Special Needs Activities – 91.220(i) .....	187

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AP-75	Barriers to Affordable Housing – 91.220(j) .....	192
AP-85	Other Actions – 91.220(k) .....	196
AP-90	Program Specific Requirements – 91.220(l)(1,2,4) .....	201

**PART VII. EXHIBITS**

Citizen Participation

Maps

SF 424 Form

Certifications

**CARES Act Substantial Amendment # 3:**

*The third amendment was submitted to HUD on August 2, 2022 to amend the following CDBG-CV projects: Technology Adaptations Program - decrease the original budget amount of \$315,085 by \$252,699.30 for a new budget amount of \$62,385.70; Food Security Program - increase the original budget amount of \$250,000 by \$450,000 for a new budget amount of \$700,000; Financial and Legal Counseling Program - decrease the original budget amount of \$250,000 by \$250,000 for a new budget amount of \$0; Housing Stabilization Program - decrease original budget amount of \$750,000 by \$77,300.70 for a new budget amount of \$672,699.30; COVID Support Program - create a new program start-up with a budget of \$120,000; and Lehigh Career & Technical Institute - increase the original budget amount of \$30,000 by \$30,000 for a new budget amount of \$60,000.*

**CARES Act Substantial Amendment # 2:**

*Second amendment on July 30, 2021 to add CDBG-CV3 allocation to the FY 2019 Annual Action Plan.*

**CARES Act Substantial Amendment # 1:**

*Amended on September 21, 2020 to add CDBG CARES Act funds to the FY 2019 Annual Action Plan.*

## **Executive Summary**

### **ES-05 Executive Summary - 91.200(c), 91.220(b)**

#### **1. Introduction**

Lehigh County, Pennsylvania is an entitlement community under the U.S. Department of Housing & Urban Development's (HUD) Community Development Block Grant (CDBG) Program. In compliance with the HUD regulations, Lehigh County has prepared this FY 2019-2023 Five

Year Consolidated Plan for the period of October 1, 2019 through September 30, 2020. This consolidated plan is a strategic plan for the implementation of the County's Federal Programs for housing, community, and economic development within Lehigh County.

The Five Year Consolidated Plan establishes the County's goals for the next five (5) year period and outlines the specific initiatives the County will undertake to address its needs and objectives by promoting: the rehabilitation and construction of decent, safe, and sanitary housing; creating a suitable living environment; removing slums and blighting conditions; promoting fair housing; improving public services; expanding economic opportunities; and principally benefitting low- and moderate-income persons.

This Five Year Consolidated Plan is a collaborative effort of Lehigh County, the community at large, social service agencies, housing providers, advocates, planning agencies, community development and economic development groups. The planning process was accomplished through a series of public meetings, stakeholder interviews, resident surveys, statistical data, and review of the County's Comprehensive Plan and other community plans.

**Maps:**

Included in this Plan in the appendix section are the following 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
- Low/Moderate Income Block Groups and CDBG Project Locations

## 2. **Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview**

The "Vision" of this Five Year Consolidated Plan is to serve as a consolidated planning document, an application, and a strategic plan for Lehigh County. As part of the Five Year Consolidated Plan, the community must develop goals and objectives. The following strategies with subsequent goals and priorities have been identified for Lehigh County for the period of FY 2019 through FY 2023 for the Community Development Block Grant (CDBG) Program:

### **HOUSING STRATEGY - HSS**

#### **Goal:**

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

#### **Objectives:**

- **HSS-1 Home Ownership** - Promote and assist in developing homeownership opportunities for low- and moderate-income persons & families.
- **HSS-2 Mixed Income Housing** - Promote and assist in the development of mixed income housing, both rental housing and housing for homebuyers.
- **HSS-3 Housing Rehabilitation** - Promote and assist in the preservation of existing owner and renter occupied housing stock in the County.
- **HSS-4 Housing Construction** - Promote and assist in the development of affordable housing, both rental and sales housing.
- **HSS-5 Revitalization** - Promote and assist in the stabilization of residential neighborhoods by removing slums and blight, assembling sites for new housing, rehabilitation of existing housing, and code enforcement.
- **HSS-6 Fair Housing** - Affirmatively further fair housing by promoting fair housing choice throughout Lehigh County.
- **HSS-7 Housing Support** - Promote and assist in housing counseling and support services to low- and moderate-income persons and families.

### **HOMELESS STRATEGY - HOM**

#### **Goal:**

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

#### **Objectives:**



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

#### **SPECIAL NEEDS STRATEGY - SNS**

##### **Goal:**

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

##### **Objectives:**

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

#### **COMMUNITY DEVELOPMENT STRATEGY - CDS**

##### **Goal:**

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

##### **Objectives:**

- **CDS-1 Community Facilities** - Assist in improving parks, recreational centers, trails, libraries, and other public and community facilities throughout the County.
- **CDS-2 Infrastructure** - Assist in improving the public infrastructure through rehabilitation, reconstruction, and new construction.
- **CDS-3 Public Services** - Assist in improving and increasing public safety, municipal services, and public service and human service programs throughout Lehigh County.

- **CDS-4 Accessibility** - Assist in improving the physical and visual accessibility of community facilities, infrastructure, and public buildings throughout the County.
- **CDS-5 Public Safety** - Assist in improving the public safety facilities, equipment, and ability for first responders for emergency situations throughout the County.
- **CDS-6 Clearance** - Assist in removing and eliminating slums and blighting conditions through demolition of vacant, abandoned, unsafe and dilapidated structures throughout the County.
- **CDS-7 Public Transit** - Promote development of additional bus routes and improved public transportation for low- and moderate-income persons.

#### **ECONOMIC DEVELOPMENT STRATEGY - EDS**

##### **Goal:**

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

##### **Objectives:**

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

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

##### **Goal:**

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

##### **Objectives:**

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

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

### **3. Evaluation of past performance**

Lehigh County has a good performance record with HUD. The County regularly meets the performance standards established by HUD. Each year the County prepares its Consolidated Annual Performance and Evaluation Report (CAPER). This report is submitted within ninety (90) days after the start of the new program year. Copies of the CAPER are available for review at Lehigh County's Department of Community and Economic Development.

The FY 2017 CAPER, which was the second to last CAPER for the County's previous Five-Year Consolidated Plan, was approved by HUD in a letter dated April 8, 2019. In the FY 2017 CAPER, the Lehigh County expended 97.95% of its CDBG funds to benefit low- and moderate-income persons. The County expended 12% of its funds during the FY 2017 CAPER period on public services, which is below the statutory maximum of 15%. The County is in compliance with the HUD 1.5 maximum drawdown ratio. The County's ratio was 1.05 as of August 2, 2018.

### **4. Summary of citizen participation process and consultation process**

Lehigh County has followed its Citizen Participation Plan in the planning and preparation of the Five Year Consolidated Plan. The County held two public hearings on the needs of the community and its residents on Tuesday, February 5, 2019 at 11:00 AM and 5:30 PM. This provided the residents, agencies and organizations with the opportunity to discuss the County's CDBG program and to provide suggestions for future CDBG Program priorities and activities.

The County emailed all the agencies and organizations that were contacted as part of the planning process to inform them that the plans were on public display and gave them information about the second public hearing.

A copy of the "Draft Five Year Consolidated Plan and the FY 2019 Annual Action Plan" was placed on public display for review by the general public, agencies and organizations in the community. A newspaper notice announcing that these documents were placed on public display was published in a newspaper of general circulation in the area. The "Draft Five Year Consolidated Plan and the FY 2019 Annual Action Plan" were on public display at the following locations:

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

- Catasauqua Public Library  
302 Bridge Street  
Catasauqua, PA 18032
- Coplay Library  
49 South 5<sup>th</sup> Street  
Coplay, PA 18037
- Emmaus Public Library  
11 East Main Street  
Emmaus, PA 18049
- Lower Macungie Library  
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>

A citizen survey was prepared and sent out to residents. Also, a link was placed on the County's website. The results of the survey were used to help determine the goals and outcomes. A more detailed analysis and description of the citizen participation process is contained in Section PR-15 Citizen Participation.

**CARES Act Substantial Amendment # 3:**

Lehigh County ran a newspaper notice on Wednesday, July 27, 2022 of the FY 2019 Annual Action Plan - Substantial Amendment # 3. The County accepted public comments until Monday, August 1, 2022. The County held a Public Hearing on the Substantial Amendment on Friday, July 29, 2022 at 11:30 AM. The public hearing was held in Room 519 of the Lehigh County Government Center, 17 South 7<sup>th</sup> Street, Allentown, PA 18101. The purpose of the Public Hearing was to present the Substantial Amendment to the residents for the CDBG-CV funds.

**5. Summary of public comments**

Lehigh County held one Needs Public Hearing on Tuesday, February 5, 2019 at 11:00 AM and another Needs Public Hearing on the same day at 5:30 PM. Comments received at those public hearings are included in the attachments at the end of the Five Year Plan.

The FY 2019-2023 Five Year Consolidated Plan and FY 2019 Annual Action Plan were placed on public display and a Second Public Hearing is scheduled for Wednesday, July 17, 2019. Comments that were received at the Second Public Hearing are included in the attachments at the end of the Five Year Plan.

**CARES Act Substantial Amendment # 3:**

Comments received at the Public Hearing and during the display period are included in the Citizen Participation section at the end of this plan.

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

All comments and suggestions, that were received to date, have been accepted and incorporated into the planning document.

**CARES Act Substantial Amendment # 3:**

Lehigh County accepted all comments.

**7. Summary**

During the FY 2019 Program Year, Lehigh County will receive the following Federal funds:

- CDBG: \$1,216,119.00

Lehigh County proposes to undertake the following activities with the FY 2019 CDBG funds:

1. Catholic Charities – Self-Sufficiency & Intervention Program - \$29,700.00
2. Communities in Schools of the Lehigh Valley – Career Supports at LCTI - \$25,000.00
3. County of Lehigh – County-wide Housing Rehabilitation Program (CWHR) - \$200,000.00
4. Emmaus Borough – Curb Cuts - \$34,700.00
5. Fountain Hill Borough – Street Reconstruction - \$284,050.00
6. Lehigh Carbon Community College Foundation – ESL for Communication Success - \$6,000.00
7. Lehigh Career & Technical Institute – Scholarships for Low-Income Residents - \$19,500.00
8. Lehigh Valley Center for Independent Living – People Living in Accessible Community Environments (PLACE) - \$15,062.00
9. Macungie Borough – Curb Cuts - \$11,600.00
10. Meals on Wheels – Meal Prep and Delivery - \$20,000.00
11. North Penn Legal Services – LMI Legal Aid Help - \$10,000.00
12. Salisbury Township – Sanitary Sewer Rehabilitation - \$90,799.00
13. Slatington Borough – Memorial Park - \$98,085.00
14. The Literacy Center – ESL & ABE Courses - \$15,000.00
15. Whitehall Township – Curb Cuts - \$113,400.00
16. Administration - \$243,223.00

### **CARES Act Substantial Amendment # 3:**

Lehigh County is amending its FY 2019 Annual Action Plan to access the CARES Act funds. The County will receive two (2) allocations of the Community Development Block Grant - Coronavirus (CDBG-CV) funds. The first allocation received by the County was \$757,860 and in the third round of funding, the County received an allocation of \$1,267,910 for a total allocation of \$2,025,770 CDBG-CV funds. Lehigh County amended its FY 2019 Annual Action Plan for the CARES Act funds.

The Substantial Amendment # 3 consist of the following amendments:

- **Technology Adaptations Program** - decrease the original budget amount of \$315,085 by \$252,699.30 for a new budget amount of \$62,385.70.
- **Food Security Program** - increase the original budget amount of \$250,000 by \$450,000 for a new budget amount of \$700,000.
- **Financial and Legal Counseling Program** - decrease the original budget amount of \$250,000 by \$250,000 for a new budget amount of \$0. This project will then be canceled.
- **Housing Stabilization Program** - decrease original budget amount of \$750,000 by \$77,300.70 for a new budget amount of \$672,699.30.
- **COVID Support Program** - create a new program start-up with a budget of \$120,000.

- ***Lehigh Career & Technical Institute*** - *increase the original budget amount of \$30,000 by \$30,000 for a new budget amount of \$60,000.*

Lehigh County ran a newspaper notice on Wednesday, July 27, 2022 of the FY 2019 Annual Action Plan - Substantial Amendment # 3. The County accepted public comments until Monday, August 1, 2022. The County held a Public Hearing on the Substantial Amendment on Friday, July 29, 2022 at 11:30 AM. The public hearing was held in Room 519 of the Lehigh County Government Center, 17 South 7<sup>th</sup> Street, Allentown, PA 18101.

The FY 2019 Action Plan – Substantial Amendment # 3 was re-submitted in IDIS to HUD on or before August 5, 2022 once the public comments period ended.

## The Process

### PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

The following are the agencies/entities 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	Lehigh County	Department of Community and Economic Development

**Table 1 – Responsible Agencies**

### Narrative

The administering lead agency is Lehigh County's Department of Community and Economic Development. The Community and Economic Development Department (DCED) has four (4) full-time staff members, and one (1) part-time staff, along with a planning consulting firm to assist with the oversight and compliance for the CDBG and housing 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

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## **PR-10 Consultation - 91.100, 91.200(b), 91.215(l)**

### **1. Introduction**

Lehigh County held a series of meetings and interviews with non-profits, the Lehigh County Housing Authority, local housing providers, social service agencies, community and economic development organizations, the local Continuum of Care members, County department representatives, and representatives of the municipalities within Lehigh County. An online survey was created for stakeholders and residents to complete, which identified needs, gaps in the system, and programmatic goals for the next five years. Input from the meetings and surveys were used in the development of specific strategies and priorities for the Five Year Plan.

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

Lehigh County works with the following agencies to enhance coordination:

- **The Lehigh County Housing Authority** – Improvements to public housing communities.
- **Social Services Agencies** – funds to improve services to low and moderate income persons.
- **Housing Providers** – funds to rehabilitate and develop affordable housing and provide housing options for low- and moderate-income households.
- **Community and Economic Development Agencies** – funds to improve services to low and moderate income persons.
- **Municipalities** – funds for infrastructure improvements, public facilities, and demolition.

**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**

The CoC addresses the needs of homeless persons and persons at risk of homelessness through the Connect To Home: Coordinated Entry System of Eastern PA (CES). CES is accessible through a call center operated by PA 2-1-1 and there are seventeen (17) CES access sites across the CoCs five (5) regions that provide in-person screenings and referrals. CES has access to translation services and assessment tools in English and Spanish. Community outreach to vulnerable populations is also conducted by CES. Persons referred to intake points are assessed with the VI-SPDAT assessment system. Based on a person’s VI-SPDAT score, the person referred to CES will then be enrolled in either a Rapid Rehousing or Permanent Supportive Housing program. Risk factors for homelessness include institutional discharge without a home plan, foster care youth, the loss of employment, or families with young children.

The Point in Time Counts for the sheltered and unsheltered homeless population are completed on a designated date twice a year in the months of January and July. The collected data is forwarded to the firm of Diana T. Myers and Associates, Inc. The results of the counts are available in the state PAHMIS

system for approved users. The public can access the information through the HUD website and the Housing Alliance of Pennsylvania website.

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

**ESG** – ESG funds for member counties and cities in the Eastern PA CoC are administered through the Pennsylvania Department of Community and Economic Development (DCED) and through the City of Allentown. The CoC is consulted by DCED regarding past program performance and involvement of ESG applicants. The CoC provides input on the allocation of ESG funding to subrecipients, through a “Performance Interview Planning Checklist” that was developed as a standardized tool for CoC input on applicant capacity and participation in the CoC. A representative of the City of Allentown’s ESG program attends meetings of the Lehigh Valley Regional Homeless Advisory Board (RHAB) to coordinate the provision of services.

**Develop Performance Standards and Evaluate Outcomes** – 100% of CoC-funded projects operate using a Housing First approach, per CoC policy. The CoC provides multiple training opportunities to ensure that staff understand trauma-informed care, harm reduction, and the Housing First approach. The Eastern PA CoC has finalized a new monitoring plan that will implement goals through the CoCs Data Committee. Board members of the CoC will evaluate each applicant’s performance and participation in the CoC through a standardized checklist with scores and rankings. The Eastern PA CoC performs quarterly evaluations for ESG and CoC funded projects. Performance data generated through HMIS is also used in evaluations. Performance standards incorporate the Coordinated Entry process and the HMIS data of individuals to determine if CoC strategies are implemented effectively.

**HMIS** – Throughout different times of the year, the CoC and the HMIS lead work together to assess data quality throughout the CoC. This includes working on the Annual Homeless Assessment Report (AHAR) submission, the PIT count, project review/ranking, and working with the individual programs while completing their Annual Performance Reports (APRs). The Commonwealth of Pennsylvania’s Department of Community and Economic Development is the lead for HMIS data for the Eastern PA CoC. HMIS Data is combined with data from the Coordinated Entry queue to properly assess both projects and service provisions. ETO, the software system utilized by those that provide shelter to domestic service providers, is also utilized in conjunction with HMIS for the homeless population.

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

1	Agency/Group/Organization	Lehigh County
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Health Agency Child Welfare Agency Other government - County Civic Leaders Grantee Department
	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

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Lehigh County Department of Community & Economic Development submitted a funding request for the County-wide Housing Rehabilitation Program, and for Blighted Property Renovation. The County-wide Housing Rehabilitation Program and the Blighted Property Renovation projects were funded in FY 2019.
<b>2</b>	<b>Agency/Group/Organization</b>	<b>Coplay Borough</b>
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	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
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.

<b>3</b>	<b>Agency/Group/Organization</b>	<b>Slatington Borough</b>
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	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
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.

4	<b>Agency/Group/Organization</b>	<b>Coopersburg Borough</b>
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	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
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.

5	<b>Agency/Group/Organization</b>	<b>Alburtis Borough</b>
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	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
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.

6	<b>Agency/Group/Organization</b>	<b>Salisbury Township</b>
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	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
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.



7	<b>Agency/Group/Organization</b>	<b>Macungie Borough</b>
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	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
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
8	<b>Agency/Group/Organization</b>	<b>Lehigh County Housing Authority</b>
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
<b>9</b>	<b>Agency/Group/Organization</b>	<b>Workforce Board Lehigh Valley</b>
	<b>Agency/Group/Organization Type</b>	Services-Employment Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	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
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
<b>10</b>	<b>Agency/Group/Organization</b>	<b>Lehigh Valley Economic Development Corporation</b>
	<b>Agency/Group/Organization Type</b>	Regional organization Business Leaders Business and Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	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

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
<b>11</b>	<b>Agency/Group/Organization</b>	<b>Neighborhood Housing Services of the Lehigh Valley, Inc.</b>
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	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
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
<b>12</b>	<b>Agency/Group/Organization</b>	<b>LVHN Comprehensive Health Services</b>
	<b>Agency/Group/Organization Type</b>	Services-Persons with HIV/AIDS Health Agency Business Leaders Major Employer
	<b>What section of the Plan was addressed by Consultation?</b>	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

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
<b>13</b>	<b>Agency/Group/Organization</b>	<b>Lehigh Valley Planning Commission</b>
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Regional organization Planning organization Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	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
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
<b>14</b>	<b>Agency/Group/Organization</b>	<b>Lehigh County Emergency Management Department</b>

	<b>Agency/Group/Organization Type</b>	Other government - Local Regional organization Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
	<b>15 Agency/Group/Organization</b>	<b>VIA of the Lehigh Valley</b>
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Persons with Disabilities Services-Health Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	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
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.

16	<b>Agency/Group/Organization</b>	<b>North Penn Legal Services</b>
	<b>Agency/Group/Organization Type</b>	Services - Housing Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	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
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
17	<b>Agency/Group/Organization</b>	<b>The Literacy Center</b>
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities Services-Education Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	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
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.

18	<b>Agency/Group/Organization</b>	<b>Meals on Wheels of the Greater Lehigh Valley</b>
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons Services-Health Health Agency
	<b>What section of the Plan was addressed by Consultation?</b>	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
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
19	<b>Agency/Group/Organization</b>	<b>Center for Vision Loss</b>
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-Health Health Agency
	<b>What section of the Plan was addressed by Consultation?</b>	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

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
<b>20</b>	<b>Agency/Group/Organization</b>	<b>Community Action Development Corporation of Allentown</b>
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless Service-Fair Housing Regional organization Planning organization Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	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
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
<b>21</b>	<b>Agency/Group/Organization</b>	<b>Lehigh Conference of Churches</b>
	<b>Agency/Group/Organization Type</b>	Housing Services-Children Services-Elderly Persons Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services - Victims



	<b>What section of the Plan was addressed by Consultation?</b>	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
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
22	<b>Agency/Group/Organization</b>	<b>Valley Youth House</b>
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-homeless Service-Fair Housing Child Welfare Agency Publicly Funded Institution/System of Care
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment 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
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.

23	<b>Agency/Group/Organization</b>	<b>Community First Fund</b>
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Employment Community Development Financial Institution
	<b>What section of the Plan was addressed by Consultation?</b>	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
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
24	<b>Agency/Group/Organization</b>	<b>Catholic Charities Diocese of Allentown</b>
	<b>Agency/Group/Organization Type</b>	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

	<b>What section of the Plan was addressed by Consultation?</b>	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
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
25	<b>Agency/Group/Organization</b>	<b>The Salvation Army</b>
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Elderly Persons Services-Victims of Domestic Violence Services-homeless Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	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
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.

26	<b>Agency/Group/Organization</b>	<b>Lehigh Valley Center for Independent Living</b>
	<b>Agency/Group/Organization Type</b>	Housing Services-Elderly Persons Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	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
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
27	<b>Agency/Group/Organization</b>	<b>Turning Point of the LV, Inc.</b>
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Victims of Domestic Violence Services - Victims Child Welfare Agency Publicly Funded Institution/System of Care
	<b>What section of the Plan was addressed by Consultation?</b>	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

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
<b>28</b>	<b>Agency/Group/Organization</b>	<b>The ARC: Lehigh &amp; Northampton Counties</b>
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Health Services-Education Health Agency Child Welfare Agency
	<b>What section of the Plan was addressed by Consultation?</b>	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
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
<b>29</b>	<b>Agency/Group/Organization</b>	<b>Casa Guadalupe Center</b>
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Education Services-Employment Child Welfare Agency Civic Leaders

	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?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
30	Agency/Group/Organization	<b>BB&amp;T</b>
	Agency/Group/Organization Type	Business Leaders Private Sector Banking / Financing
	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?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
31	Agency/Group/Organization	<b>Pennsylvania Eastern Continuum of Care Collaborative</b>
	Agency/Group/Organization Type	Housing Services - Housing Publicly Funded Institution/System of Care Correctional Institutions

	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Group meeting held, phone calls; homeless priorities; social service and economic development needs.
32	<b>Agency/Group/Organization</b>	<b>USDA Rural Utilities</b>
	<b>Agency/Group/Organization Type</b>	Broadband Service Provider
	<b>What section of the Plan was addressed by Consultation?</b>	Broadband Access Plan
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Phone interview to discuss broadband access needs.

**Table 2 – Agencies, groups, organizations who participated**

The following agencies were consulted during the preparation of the Five Year Consolidated Plan:

- Lehigh County
- Coplay Borough
- Slatington Borough
- Coopersburg Borough
- Alburtis Borough
- Salisbury Township
- Macungie Borough
- Lehigh County Housing Authority
- Neighborhood Housing Services of the Lehigh Valley, Inc.
- Lehigh Valley Planning Commission
- VIA of the Lehigh Valley
- North Penn Legal Services
- The Literacy Center
- CACLV/Community Action Development Corporation of Allentown
- Lehigh Conference of Churches
- Valley Youth House
- Community First Fund
- Catholic Charities Diocese of Allentown
- The Salvation Army

- Lehigh Valley Center for Independent Living
- Turning Point of the LV, Inc.
- Casa Guadalupe Center
- BB&T

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

All agency 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?
<b>CoC Consolidated Application</b>	Lehigh Valley Regional Homeless Advisory Board	They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans.
<b>Annual and Five Year Capital Plans</b>	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.
<b>Lehigh County Emergency Management Plan</b>	Lehigh County Emergency Management	They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans.
<b>2017 Childhood Lead Surveillance Annual Report</b>	PA Department of Health	They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans.
<b>Pennsylvania Broadband Initiative</b>	PA Department of Community and Economic Development	They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans.
<b>Livable Landscapes – Lehigh County Open Space Plan</b>	Lehigh Valley Planning Commission	They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans.
<b>Analysis of Impediments to Fair Housing Choice</b>	Lehigh County Department of Community and Economic Development	They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans.

**Table 3 – Other local / regional / federal planning efforts**



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**Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))**

Lehigh County's Department of Community and Economic Development is the administrating agency for the CDBG program. Close coordination is maintained with other County departments such as the Public Works, Parks & Recreation, Administration, Emergency Management, Lehigh County Housing Authority, the Eastern PA Continuum of Care, and the Lehigh Valley Planning Commission, as well as local municipalities such as Coopersburg, Slatington, Macungie, Alburtis, and Coplay Boroughs and Salisbury Township. Coordination with various non-profit organizations, such as Lehigh Valley Conference of Churches, North Penn Legal Services, Valley Youth House, Catholic Charities, Turning Point of the LV, and Casa Guadalupe Center helped aid the planning process which developed priorities. The County works closely with the Lehigh County Commissioners and County staff to address projects and activities that extend between multiple municipalities within the County.

DCED has developed an evaluation checklist for ESG applicants to determine funding based on priorities. The CoC partners with the City of Allentown, the other ESG recipient in Lehigh County, to coordinate funding. The City of Allentown sends a representative to the meetings of the Lehigh Valley Regional Homeless Advisory Board (RHAB) where CoC funding is determined based on performance data and CoC priorities.

**Narrative (optional):****AFH Specific:**

Lehigh County previously prepared an Analysis of Impediments to Fair Housing Choice in 2009. On July 16, 2015, the U.S. Department of Housing and Urban Development (HUD) published its final rule on Affirmatively Furthering Fair Housing. This rule attempted to establish a standardized process for fair housing planning and so the County began the process of preparing an Assessment of Fair Housing (AFH) in the summer of 2017. However, HUD announced on Friday, May 18, 2018 that it would be suspending the implementation of the AFFH Rule, withdrawing the AFH Tool, and requiring communities to revert back to the Analysis of Impediments to Fair Housing Choice (AI) due to deficiencies in the requirements, information available, and public participation.

Therefore, Lehigh County has prepared this 2018-2022 Analysis of Impediments to Fair Housing Choice (AI) in cooperation with the Lehigh County Housing Authority. The AI was approved by the County and submitted to HUD on February 28, 2019. The findings produced through this analysis will be further addressed in the County's FY 2019-2023 Five Year Consolidated Plan. To complete the AI, Lehigh County and the Lehigh County Housing Authority conducted research through regional studies and held in-person meetings and phone interviews. All agencies consulted for the Five Year Consolidated Plan were consulted for the AI, including additional organizations such as: the Allentown Housing Authority, Greater Lehigh Valley Realtors, Fulton Mortgage, Hispanic American Organization, Housing Association Development Center, Housing Equality Center, LANta, New Bethany Ministries, Northwestern School District, QNB Bank, and the Lehigh County Community College.

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**PR-15 Citizen Participation****1. Summary of citizen participation process/Efforts made to broaden citizen participation  
Summarize citizen participation process and how it impacted goal-setting**

Lehigh County has followed its adopted Citizens Participation Plan to develop its Five Year Consolidated Plan.

The FY 2019-2023 Consolidated Plan and FY 2019 Annual Action Plan have many components that require and encourage citizen participation. These components consist of the following: interviews and roundtable discussions with various stakeholders; telephone interviews; a public needs hearing; and a public hearing to gather comments on the draft plan on public display. The County also developed a survey to obtain resident input. The Survey was made available in an online version on the County's website and in a hard copy version available in the Lehigh County Government Center, Lehigh County Housing Authority's communities, and other public facilities. The County received 102 completed surveys. All of these comments are included in the Consolidated and Annual Action Plan in the Exhibit Section. Through the citizen participation process, the County uses citizen input to develop how the plan would best serve the low- and moderate-income population and to reach the goals set forth in the Five Year Consolidated Plan.

**CARES Act Substantial Amendment # 3:**

Lehigh County ran a newspaper notice on Wednesday, July 27, 2022 of the FY 2019 Annual Action Plan - Substantial Amendment # 3. The County accepted public comments until Monday, August 1, 2022. The County held a Public Hearing on the Substantial Amendment on Friday, July 29, 2022 at 11:30 AM. The FY 2019 Annual Action Plan – Substantial Amendment # 3 was submitted to the U.S. Department of Housing and Urban Development Philadelphia Office on or before August 5, 2022.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1.	Public Meeting	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/ broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Agencies/ Organizations</p>	See public hearing sign-in sheets in the Exhibit section of the Consolidated Plan.	See public hearing comments in the Exhibits section of the Consolidated 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 and reasons	URL (If applicable)
2.	Newspaper Ad	Minorities  Persons with disabilities  Non-targeted/ broad community  Residents of Public and Assisted Housing  Agencies/ Organizations	None.	None.	None.	Not Applicable.

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3.	Resident Surveys	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/ broad community</p> <p>Residents of Public and Assisted Housing</p> <p>County wide</p>	Placed the Resident Survey on the County's website and emailed surveys to agencies/ organizations. In addition, they were passed out at public hearing and agencies/ organizations meetings.	The County received 102 completed resident surveys. The tabulations of the Resident Surveys are in the Exhibit section of this Consolidated Plan.	All comments were accepted.	<a href="https://www.surveymonkey.com/r/2019LehighCounty">https://www.surveymonkey.com/r/2019LehighCounty</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4.	Agency/ Organization Surveys	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/ broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Agencies/ Organizations</p>	The agency/ organization surveys were sent out to agencies/ organizations in the County.	A summary of the survey responses and meeting minutes can be found in the Exhibit section of this Consolidated Plan.	All comments were accepted.	Not Applicable.

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5.	<b>CARES Act Substantial Amendment # 3 - Newspaper Ad</b>	Minorities Persons with disabilities  Non-targeted/ broad community  Residents of Public and Assisted Housing  Agencies/ Organizations	On Wednesday, July 27, 2022, Lehigh County published the CARES Act Substantial Amendment Public Hearing Notice in the "Morning Call."	None.	None.	Not Applicable.

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6.	<b>CARES Act Substantial Amendment # 3 - Public Meeting</b>	<p>Minorities Persons with disabilities</p> <p>Non-targeted/ broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Agencies/ Organizations</p>	<p>The CARES Act Substantial Amendment # 3 Public Meeting was held on Friday, July 29, 2022 at 11:30 AM to discuss the CARES Act Substantial Amendment # 3 for the County. The County received no public comments on the draft Substantial Amendment # 3.</p>	<p>Meeting minutes can be found in the appendix section of this Annual Action Plan – Substantial Amendment.</p>	None.	Not Applicable.

Table 4 – Citizen Participation Outreach



## **Needs Assessment**

### **NA-05 Overview**

#### **Needs Assessment Overview**

Lehigh County used the HUD Comprehensive Housing Affordability Strategy (CHAS) data, which provides statistical data on housing needs, to prepare its estimates and projects. The tables in this section have been prepopulated with HUD data sets, based on the American Community Survey (ACS) 2011-2015 Five Year Estimates, and the 2010 U.S. Census. This data is the most current information available to assess housing needs, homeless needs, special needs, social service needs, economic development needs, etc.

Lehigh County is part of the Eastern PA Continuum of Care. Lehigh County is a member of the CoC. Data for the development for the homeless needs section was obtained from consultation with the CoC and member agencies that serve Lehigh County, such as Valley Youth House, Turning Point of the Lehigh Valley, Lehigh Valley Conference of Churches, the YMCA of Lehigh County, the Salvation Army, and Catholic Charities.

Additional needs for Lehigh County were obtained from input and interviews with various social service agencies, housing providers, County staff, and survey responses.

## NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

### Summary of Housing Needs

The population of Lehigh County is rapidly increasing. In 2010, the population of Lehigh County was 350,164 and it rose to 368,100 in 2018, which was the most recent population estimate. This is an increase of 5.1% over the last eight (8) years. The number of households in Lehigh County in 2010 was 142,812 and increased to 146,242 in 2017, which was an increase of 2.4% over the last seven (7) years. The supply of housing increased at a lower rate than the population of Lehigh County, thus contributing to the housing shortage.

Furthermore, the median income of the area increased by 20% from \$53,551 to \$56,117. This increase in median income represents a change in nominal dollars and not a change in real dollars. In order to calculate the change in real dollars, the Consumer Price Index is used to calculate the inflation rate for a given period. Between 2000 and 2015, the cumulative inflation rate was approximately 38.5%, meaning that the \$53,551.00 median income in 2000 would be \$74,168.14 if it were expressed in 2015 dollars. By taking into consideration the rate of inflation, the median income in Lehigh County has not kept up with the rate of inflation, and has actually remained stagnant since 2000.

Lehigh County became a Federal Entitlement in 2007. The County contains the entire City of Allentown, which is an entitlement community itself, and a portion of the City of Bethlehem, which is also an entitlement community. Because Lehigh County was not a Federal entitlement in the base year of 2000, its Census numbers include the other entitlement communities within the County: the City of Allentown and a portion of the City of Bethlehem while the 2015 population only includes the Lehigh County entitlement community. For this reason, Lehigh County incorrectly appears to have lost population below. However, the population and number of households recorded below for 2015 can be taken to reflect the correct population and number of households in Lehigh County outside of the City of Allentown and the portion of the City of Bethlehem in Lehigh County.

Demographics	Base Year: 2000	Most Recent Year: 2015	% Change
Population	349,497	214,055	-39%
Households	129,889	82,875	-36%
Median Income	\$53,551	\$56,117	5%

**Table 5 - Housing Needs Assessment Demographics**

**Data Source:** 2000 Census (Base Year), 2011-2015 ACS (Most Recent Year)

**Number of Households Table**

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	6,075	7,210	13,140	9,325	47,125
Small Family Households *	1,593	1,509	4,230	3,545	26,470
Large Family Households *	138	247	928	786	4,210
Household contains at least one person 62-74 years of age	1,526	1,684	3,408	2,322	9,769
Household contains at least one person age 75 or older	1,388	2,809	3,054	1,108	2,726
Households with one or more children 6 years old or younger *	852	488	1,452	1,349	5,104
* the highest income category for these family types is >80% HAMFI					

**Table 6 - Total Households Table**

Data Source: 2011-2015 CHAS

**Housing Needs Summary Tables****1. Housing Problems (Households with one of the listed needs)**

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Substandard Housing - Lacking complete plumbing or kitchen facilities	165	140	270	40	615	10	0	68	35	113
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	40	10	20	0	70	10	0	0	25	35

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	10	22	95	40	167	0	20	44	8	72
Housing cost burden greater than 50% of income (and none of the above problems)	1,989	929	278	45	3,241	1,835	1,488	1,489	514	5,326
Housing cost burden greater than 30% of income (and none of the above problems)	222	908	1,804	429	3,363	388	1,546	2,620	1,522	6,076
Zero/negative Income (and none of the above problems)	181	0	0	0	181	276	0	0	0	276

Table 7 – Housing Problems Table

Data 2011-2015 CHAS  
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	2,204	1,104	654	125	4,087	1,855	1,508	1,609	582	5,554

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having none of four housing problems	938	1,459	3,590	2,335	8,322	634	3,137	7,290	6,275	17,336
Household has negative income, but none of the other housing problems	181	0	0	0	181	276	0	0	0	276

**Table 8 – Housing Problems 2**

Data 2011-2015 CHAS

Source:

**3. Cost Burden > 30%**

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>								
Small Related	791	617	752	2,160	569	565	1,656	2,790
Large Related	53	103	200	356	58	107	290	455
Elderly	737	713	753	2,203	1,212	2,017	1,681	4,910
Other	742	542	661	1,945	413	329	514	1,256
Total need by income	2,323	1,975	2,366	6,664	2,252	3,018	4,141	9,411

**Table 9 – Cost Burden > 30%**

Data 2011-2015 CHAS

Source:

## 4. Cost Burden &gt; 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>								
Small Related	757	270	79	1,106	534	426	593	1,553
Large Related	53	39	0	92	54	73	104	231
Elderly	588	395	189	1,172	894	775	555	2,224
Other	673	304	74	1,051	373	185	241	799
Total need by income	2,071	1,008	342	3,421	1,855	1,459	1,493	4,807

Table 10 – Cost Burden &gt; 50%

Data 2011-2015 CHAS  
Source:

## 5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Single family households	50	22	115	40	227	0	20	34	29	83
Multiple, unrelated family households	0	0	0	0	0	10	0	10	4	24
Other, non-family households	0	10	10	0	20	0	0	0	0	0
Total need by income	50	32	125	40	247	10	20	44	33	107

Table 11 – Crowding Information – 1/2

Data 2011-2015 CHAS  
Source:

## 6. Households with Children Present

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Households with Children Present	-	-	-	-	-	-	-	-	-	-

Table 12 – Crowding Information – 2/2

Data Source: 2011-2015 CHAS

**Describe the number and type of single person households in need of housing assistance.**

According to the 2011-2015 American Community Survey (ACS), there were 82,875 households in 2015 in Lehigh County. Based on this number of households, 37,347 (45.0%) of all households were single person households living alone. 65% of households with at least one person over the age of 75 have an income that is between 0% to 80% of the Household Median Income. Based on the ACS estimates, 41% of all persons with a cost burden on housing of >50% are classified as elderly. The County will need to assist in obtaining funding and collaborating with housing service and elderly support agencies to provide programs, activities, and accommodations for its elderly population.

Of the 2,802 families/individuals on the public housing waiting list according to the Lehigh County Housing Authority as of June 30, 2019 (last waiting list available), 1,877, or 67%, are single-person households, and 1,877, or 67%, are Extremely Low Income households, and 782, or 26%, are Very Low Income households. This shows that there is a shortage of subsidized, affordable housing for single-person households, many of whom are elderly, disabled, and living on fixed-incomes.

**Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.**

**Disabled Population** – Based on the 2011-2015 CHAS Data and the 2011-2015 ACS Data, it is estimated that 31.5% of all disabled renters have a housing problem that includes cost overburdened by 30% or another type of housing problem, and 25.2% of disabled homeowners have a housing problem that includes cost overburdened by 30% or another type of housing problem. From these estimates, it can be deduced that approximately 2,065 disabled renters have a housing problem and approximately 2,371 disabled homeowners have a housing problem. A breakdown of the types of disability in the County is as follows: hearing difficulty = 11.9% (of the total civilian noninstitutionalized population in Lehigh); vision difficulty = 1.89%; cognitive difficulty = 2.14%; ambulatory difficulty = 5.91%; self-care difficulty = 5.39%; and independent living difficulty = 1.88%.

**Victims of Domestic Violence, Dating Violence, sexual assault, and stalking** – Based on consultation with Turning Point of the LV, it is estimated that more than 2,600 persons in the Lehigh Valley experience domestic violence, dating violence, sexual assault, and stalking per year, and are in need of housing assistance.

The clients that Turning Point of the LV works with need help with issues relating to: housing; jobs; child care; access to a vehicle or transportation; proficiency in the English language; mental health services; doctor/dentist/medical care; budgeting classes; ongoing support (from friends and family); parenting classes/groups/skills; counseling services; etc.

Turning Point of the LV provides temporary housing and connections to employment opportunities for victims of domestic violence. Often times, domestic violence victims require job training, child care, or additional private transportation to make these employment opportunities safe and viable. Housing options for domestic violence victims are slim in Lehigh County due to the lack of affordable housing, and the waiting lists are long. The salary needed for an affordable unit is difficult for a person to earn if they are in a transient situation and victims frequently have limited work histories and credit. There is a need for additional housing and job training for this population.

### **What are the most common housing problems?**

The largest housing problem in Lehigh County is housing affordability. According to the 2011-2015 ACS data, an estimated 44.4% of all renter households are cost overburdened by 30% or more, and an estimated 42.0% of all owner households are cost overburdened by 30% or more. Approximately 51% of owner occupied households with a mortgage are cost overburdened by 30% or more, and an estimated 44% of owner occupied households are cost overburdened by 50% or more.

In consultations, interviews and surveys, the lack of affordable, decent, sustainable housing is the biggest issue in Lehigh County. The lack of affordable housing cuts across demographic groups and affects everyone in the County. There are populations of elderly residents that are affected by the lack of accessibility in the County's housing stock. There are also immigrant populations that are affected by the lack of affordable housing. A large portion of this population rents and faces issues with decent housing and interiors of housing that are code compliant. Because the housing stock is older, most single family residential structures are two stories in height, therefore, are not accessible to the elderly and people with disabilities.

Older properties in the City of Allentown are more affordable than properties outside the City within Lehigh County. Many of these properties are rentals and homeownership is more common outside of the City of Allentown in Lehigh County. Because of the large number of homeowners, there is a need for homeowner rehabilitation as residents of Lehigh County age in place. There is substantial demand for owner-occupied housing and many residents want to purchase a home in the County. Downpayment assistance programs have the potential to assist these populations.

There is also a substantial need for rental housing in the County. There are fewer rental units in the County, but renting is typically more affordable. Additional rental housing units would provide more



affordable housing for all demographics of County residents. The quality of the rental housing is less than ideal, because rehabilitation and maintenance are not always being performed with in older parts of the County and City. In addition, a lot of these rentals are not accessible for the elderly and disabled because there are no elevators.

**Are any populations/household types more affected than others by these problems?**

The population increase in Lehigh County and subsequent high demand for housing have caused all populations to be affected by the lack of affordable housing. Families are the most affected by this lack of affordable housing, because new units in the County are typically one-bedroom or two-bedroom apartments. Many of the immigrants that come to the County do not have bank accounts and struggle to make downpayments, though this is changing and more immigrants that have spent less than five (5) years in the United States have been applying for loans and purchasing homes. As a result of these factors, there is a need for education and outreach on landlord/tenant rights and fair housing rights in both English and in Spanish.

Another group affected by the lack of affordable housing are the homeless and persons at-risk of becoming homeless, including persons who are victims of domestic violence. Most of the population that are at-risk of becoming homeless are facing a housing cost overburden problem and would benefit from emergency housing assistance for rent and/or mortgage payments and utilities to help them avoid homelessness. There are short term assistance options available, but these are scarce and hard to come by, especially if it is needed by the same person more than once. People transitioning from shelter care, prison, or a health care facility are also affected by the cost overburden housing problem, particularly when trying to secure a source of income to maintain housing.

**Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance**

According to the Lehigh County Conference of Churches, Catholic Charities, Valley Youth House, and other organizations that provide services to the homeless, characteristics and needs of both low-income individuals and families with children who receive services at local shelters are as follows:

**Individuals:** Mental Health issues; criminal histories severely limiting job opportunities; lack of sustainable living wages; lack of training for available jobs; evictions; lack of a support system and/or burned bridges with friends and family; a lack of transportation; and substance abuse issues.

**Families with Children:** Single mothers; no means of transportation; no affordable childcare; a lack of education; a lack of job skills; evictions; unemployed, or employed at a low paying job that cannot sustain a family on one income; and no family support and/or burned bridges with friends and family.

**Formerly Homeless Individuals / Families Receiving Rapid Re-Housing Assistance Nearing Termination:**

Further assistance to this target group may be provided for a limited time if an event should occur through no fault of their own and if required documentation can be provided. Examples include hospitalization due to illness or surgery, official lay-off from employment, or a sudden and drastic cut in work hours.

Many residents of the area across all demographics are cost overburdened, and a small financial hardship can affect these people and force them to become homeless. The high cost of rent plays a significant role in making it difficult for residents to remain in their homes. Most low-income families and persons at-risk of becoming homeless, including persons who are victims of domestic violence, are facing eviction due to a housing cost overburden problem, and would benefit from emergency housing assistance for rent and/or mortgage payments and utilities to help them avoid homelessness. These populations can also benefit from job training to gain the skills for permanent employment, and transportation to get to work.

The Eastern PA CoC has seen a 4% increase in the number of homeless people that have exited to Permanent Housing who had previously been housed in Emergency Shelter, Transitional Housing, and Rapid Rehousing. Part of this increase comes from a diversion strategy which helps families identify housing options and supports quickly to return to housing. The CoC will implement Landlord Engagement Training to build relationships with landlords and train them on the Housing First Approach. The CoC has trained case managers to ensure that they address those in Rapid Rehousing using best practices including housing first, housing focused case management, harm reduction, motivational interviewing, and trauma-informed care.

**If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:**

The McKinney-Vento Act established categories in the Homeless Definition Final Rule for the At Risk Group. The Act was amended to include assistance to those at risk of homelessness who did not meet the definition in the Final Rule. These include: 1) individuals and families; 2) unaccompanied children and youth; and 3) families with children and youth.

According to the CoC, the methodology used to generate estimates is based on historical incidence, such as the yearly Point in Time Counts and Homeless Management Information System (HMIS) data, which is a local information technology system used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. Providers participating in the PA HMIS are required to collect and record certain data elements for all new and continuing clients in the HMIS. According to the 2017 PA HMIS Policy, those at-risk of homelessness can be defined in this manner:

**Imminent Risk of Homelessness** - Persons who are housed and at imminent risk of losing housing include people who at program entry or program exit are experiencing one of the following:

- Being evicted from a private dwelling unit (including housing provided by family/friends);
- Being discharged from a hospital or other institution;
- Living in a hotel or motel and lacking the financial resources to remain housed in the establishment; or
- Living in housing that has been condemned by housing officials and is no longer considered meant for human habitation.

Additionally, a person residing in one of these places must also meet the following two conditions:

- Have no appropriate subsequent housing options identified; and
- Lack the financial resources and support networks needed to obtain immediate housing or remain in existing housing.

**Unstably housed and at-risk of losing their housing** - persons who are housed and at-risk of losing housing include people who at program entry or program exit:

- Are in their own housing or doubled up with friends or relatives and at-risk of losing their housing due to high housing costs, conflict, or other conditions negatively impacting their ability to remain housed;
- Living in a hotel or motel and lacking the financial resources to remain housed in the establishment; and
- Lack the resources and support networks needed to maintain or obtain housing.

**Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness**

The high cost of decent, safe, sound, and accessible housing in the County creates instability and an increased risk of homelessness for lower income families in the area. Many families are living from paycheck to paycheck and are paying over 30% of their income for housing, which may or may not be decent, safe, sound, and accessible.

Contributing housing characteristics to instability and increased risk of homelessness include: untreated/undiagnosed mental health issues; substance abuse issues; physical disabilities, rendering a person unable to work, but not currently receiving Social Security Disability benefits; single and unemployed mothers expecting another child; poor rental and credit issues; and unemployed, often troubled, young adults aging out of foster care, who are made to leave the home by the foster parents.

According to housing providers, other housing characteristics that add to instability is the lack of financial literacy and basic life skills. There is a need to teach basic living skills like managing budgets, managing time, and living from crisis to crisis. Residents also need basic housing education to learn how to maintain stable housing.

**Discussion**

The population of Lehigh County is increasing, and many residents are facing the effects of increased housing costs and a shortage of decent, safe, sound, and accessible housing that is affordable to low income persons.

**Broadband Needs:**

Through phone interviews, Lehigh County determined that the rural portions of Lehigh County are the regions most affected by a lack of broadband internet access. Each state has a plan or is charged with developing a plan for broadband access. In the Commonwealth of Pennsylvania, the Department of Community and Economic Development's role is to increase broadband access, and there is no countywide plan. Housing stock in the unincorporated, rural areas of the County require additional broadband access to connect them to the broadband in the City of Allentown and the Boroughs of the County.

## NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

During the planning process for the preparation of Lehigh County's Five Year Consolidated Plan, an evaluation and comparison was made to determine if any racial or ethnic group is disproportionately affected by housing problems in the County. Disproportionately greater need is defined as a group having at least 10 percentage points higher than the percentage of persons as a whole. The total number of White Households in Lehigh County is 73,466 households (88.7%); the number of Black/African American Households is 1,623 households (1.9%); the number of American Indian and Alaska Native Households is 94 households (0.1%), the number of Asian Households is 2,920 households (3.5%); the number of Native Hawaiian and Other Pacific Islander Households is 0 households (0.0%), and the total number of Hispanic Households is 3,989 households (4.8%).

### 0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,659	958	457
White	3,703	734	367
Black / African American	350	15	0
Asian	185	110	60
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	405	89	39

**Table 13 - Disproportionally Greater Need 0 - 30% AMI**

Data Source: 2011-2015 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

**30%-50% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	5,043	2,124	0
White	4,538	1,969	0
Black / African American	154	10	0
Asian	68	40	0
American Indian, Alaska Native	0	30	0
Pacific Islander	0	0	0
Hispanic	274	55	0

**Table 14 - Disproportionally Greater Need 30 - 50% AMI**

Data Source: 2011-2015 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

**50%-80% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,699	6,453	0
White	5,754	5,942	0
Black / African American	189	40	0
Asian	113	114	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	588	254	0

**Table 15 - Disproportionally Greater Need 50 - 80% AMI**

Data Source: 2011-2015 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

**80%-100% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,652	6,680	0
White	2,367	6,010	0
Black / African American	75	94	0
Asian	14	143	0
American Indian, Alaska Native	0	15	0
Pacific Islander	0	0	0
Hispanic	99	349	0

**Table 16 - Disproportionally Greater Need 80 - 100% AMI**

Data Source: 2011-2015 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

**Discussion**

The racial composition of Lehigh County households, according to the 2011-2015 American Community Survey data, was 88.7% White; 4.8% Hispanic or Latino; 3.5% Asian; and 1.9% African American. In the 0%-30% of Area Median Income category, 61% of White households had one or more housing problem. The White population also has a large need in terms of housing problems in the 50-80% of Area Median Income category with 43.7% of total households in that category.

Also of note are the groups of Hispanic households at 0%-30% of Area Median Income, with a percentage of 7.2% of households that have one or more housing problems, and African American/Black households at 0%-30% with 6.2% of households that have one or more housing problems. Though no group meets the ten-percentage point threshold for disproportionate need, these groups are notably higher than the proportions of the population in the County as a whole.

## NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

During the planning process for the preparation of Lehigh County's Five Year Consolidated Plan, an evaluation and comparison was made to determine if any racial or ethnic group is disproportionately affected by severe housing problems in the County. Disproportionately greater need is defined as a group having at least 10 percentage points higher than the percentage of persons as a whole. Severe housing problems are distinguished from housing problems by a threshold of more than 1.5 persons per room as opposed to more than 1 person per room for overcrowding, as well as a cost burden threshold of over 50% of income as opposed to over 30% of income. Data detailing information by racial group and Hispanic origin has been compiled from the 2011-2015 CHAS data and the 2011-2015 American Community Survey Five Year Estimates. The following tables illustrate the disproportionate needs of Lehigh County.

### 0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,059	1,572	457
White	3,127	1,312	367
Black / African American	330	35	0
Asian	185	110	60
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	390	104	39

**Table 17 – Severe Housing Problems 0 - 30% AMI**

Data Source: 2011-2015 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%



**30%-50% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	2,612	4,596	0
White	2,292	4,240	0
Black / African American	75	89	0
Asian	40	68	0
American Indian, Alaska Native	0	30	0
Pacific Islander	0	0	0
Hispanic	205	124	0

**Table 18 – Severe Housing Problems 30 - 50% AMI**

Data Source: 2011-2015 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

**50%-80% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	2,263	10,880	0
White	1,957	9,704	0
Black / African American	85	144	0
Asian	79	149	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	120	717	0

**Table 19 – Severe Housing Problems 50 - 80% AMI**

Data Source: 2007-2011 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

**80%-100% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	707	8,610	0
White	562	7,815	0
Black / African American	55	109	0
Asian	4	153	0
American Indian, Alaska Native	0	15	0
Pacific Islander	0	0	0
Hispanic	14	439	0

**Table 20 – Severe Housing Problems 80 - 100% AMI**

Data Source: 2011-2015 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

**Discussion**

The racial composition of households in Lehigh County, according to the 2011-2015 American Community Survey, was 88.71% White; 4.8% Hispanic or Latino; 3.5% Asian; and 1.96% Black/African American. This data set shows that 51.3% of White households with 0%-30% of Area Median Income, have one or more severe housing problems.

Also of note are the groups of Hispanic households in the 0%-30% of Area Median Income category, that make up 7.8% of all total households in the income category with one or more severe housing problems. The Black/African American population also has a need in terms of severe housing problems in the 0-30% of Area Median Income category at 8.13% of total households in that category. Though these groups do not meet the ten-percentage point threshold for disproportionate need, they are notably higher than the proportions of the population in the County as a whole.

## NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction:

During the planning process for the preparation of Lehigh County's Five Year Consolidated Plan, an evaluation and comparison was made to determine if any racial or ethnic group is disproportionately affected by housing problems in the County. Disproportionately greater need is defined as a group having at least 10 percentage points higher than the percentage of persons as a whole.

The greatest housing problem facing Lehigh County is the lack of affordable housing and the fact that many of the County's lower income households are paying more than 30% of their total household income on housing related costs. The following information was noted: 12,190 White households were cost overburdened by 30% to 50%, and 7,640 White households were severely cost overburdened by greater than 50%; 753 Hispanic households were cost overburdened by 30% to 50%, and 700 Hispanic households were severely cost overburdened by greater than 50%; 343 Black/African American households were cost overburdened by 30% to 50%, and 370 Black/African American households were severely cost overburdened by greater than 50%; and lastly, 212 Asian households were cost overburdened by 30% to 50%, and 365 Asian households were severely cost overburdened by greater than 50%.

### Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	59,608	13,546	9,131	533
White	53,254	12,190	7,640	382
Black / African American	850	343	370	60
Asian	2,283	212	365	60
American Indian, Alaska Native	94	0	0	0
Pacific Islander	0	0	0	0
Hispanic	2,497	753	700	39

**Table 21 – Greater Need: Housing Cost Burdens AMI**

Data Source: 2011-2015 CHAS

**Discussion:**

A total of 12,190 White households were considered cost overburdened by between 30% and 50%, which is 90% of the total cases of households that were considered cost overburdened by between 30% and 50%. This number is above the 88.7% of the total number of households that the White category comprises. A total of 343 Black/African American households were considered cost overburdened by between 30% and 50%, which is 2.5% of the total number of households that were considered cost overburdened by between 30% and 50%. This number is slightly above the 1.9% of the total number of households that the Black/African American category comprises. A total of 212 Asian households were considered cost overburdened by between 30% and 50%, which is 1.5% of the total cases of households that were considered cost overburdened by between 30% and 50%. This number is below the 3.4% of the total number of households that the Asian category comprises. A total of 753 Hispanic households were considered cost overburdened by between 30% and 50%, which is 5.5% of the total cases of households that were considered cost overburdened by between 30% and 50%. This number is slightly above the 4.8% of the total number of households that the Hispanic category comprises.

A total of 7,640 White households were considered severely cost overburdened by greater than 50%, which is 83.6% of the total number of households that were considered cost overburdened by greater than 50%. This number is below the 88.7% of the total number of households that the White category comprises but still substantial. A total of 370 Black/African American households were considered cost overburdened by greater than 50%, which is 4.0% of the total cases of households that were considered cost overburdened by between 30% and 50%. This number is slightly above the 1.9% of the total number of households that the Black/African American category comprises. A total of 365 Asian households were considered severely cost overburdened by greater than 50%, which is 4.0% of the total cases of households that were considered cost overburdened by greater than 50%. This number is slightly higher than the 3.5% of the total number of households that the Asian category comprises. A total of 700 Hispanic households were considered severely cost overburdened by greater than 50%, which is 7.6% of the total cases of households that were considered cost overburdened by greater than 50%. This number is slightly higher than the 4.8% of the total number of households that the Hispanic category comprises.

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**NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)****Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?**

The racial composition of Lehigh County households, according to the 2011-2015 American Community Survey data, was 88.7% White; 4.8% Hispanic or Latino; 3.5% Asian; and 1.9% African American. There are no disproportionately impacted ethnic or racial groups (at least 10 percentage points higher than the percentage of persons as a whole) with a housing problem, severe housing problem, housing cost burden or severe housing cost burden.

When examining the percentage of each racial or ethnic group that have a housing problem, severe housing problem, or are housing cost overburdened, compared to that racial or ethnic group overall, a different picture presents itself. According to the 2011-2015 CHAS data, 16.6% of all White households, 21.13% of Black/African American households, 0.0% of American Indian and Alaska Native households, 7.26% of Asian households, and 18.88% of Hispanic households are cost-overburdened by 30%-50%, while 10.4% of White households, 22.8% of Black households, 12.5% of Asian households, and 17.55% of Hispanic households were cost overburdened by over 50%. When examining housing problems, 52.1% of White households, 82.8% of Black/African American households, 44.8% of Asian households, and 63.4% of Hispanic households have a housing problem. The populations most affected by cost overburdens are Black/African American households and Hispanic households. The numbers are lower for severe housing problems, with 25.3% of White households, 59.1% of Black/African American households, 36.3% of Asian households, and 33.8% of Hispanic households are experiencing severe housing problems. Overall, these numbers show that African American/Black households in Lehigh County are much more likely to experience a housing problem than to be cost overburdened, and that minority households in general are more likely to be cost overburdened and have a housing problem than White households.

**If they have needs not identified above, what are those needs?**

Within Lehigh County, there is no racial or ethnic group that has a disproportionate need in regards to housing problems. However, this analysis excludes the Cities of Allentown and Bethlehem. Much of the low-quality rental housing with substantial housing problems in Lehigh County lies outside its jurisdiction in the Cities of Allentown and Bethlehem. Though there may be disparities and disproportionate needs in the County, they are concentrated in the County's core cities. The County can mitigate these problems by working to create affordable housing throughout its jurisdiction.

**Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?**

There are no Racially Concentrated Areas of Poverty or Ethnically Concentrated Areas of Poverty (RCAPS or ECAPS) in Lehigh County's jurisdiction.

Some areas have higher concentrations of minorities than the County as a whole. The following areas have higher rates of minority residents when compared to the County as a whole according to American Community Survey data: Fountain Hill Borough with 20.78% Hispanic and 6.94% Black; Macungie Borough with 9.58% Hispanic; Slatington Borough with 5.58% Hispanic; Lower Macungie Township (Ancient Oaks CDP) with 6.22% Asian, 5.78% Hispanic, and 3.78% Black; and Whitehall Township (Fullerton CDP) with 21.04% Hispanic, 9.55% Asian, and 7.26% Black. While these racial cohorts are slightly concentrated within Lehigh County, the White population is fairly evenly spread out throughout the County.

According to National Origin maps and data, there is a higher rate of concentration of residents by national origin than by race. A Vietnamese population is concentrated in Lower Macungie Township (Ancient Oaks CDP), Macungie Borough, Upper Saucon Township, and Whitehall Township (Hokendauqua CDP). A German population is concentrated in Fogelsville, Whitehall Township (Fullerton CDP), Lower Macungie Township (Ancient Oaks CDP), and Upper Saucon Township. Residents of Chinese descent are concentrated in Coopersburg Borough, Upper Macungie Township, and Catasauqua Borough. Descendants of the Dominican Republic are concentrated in the areas around Emmaus Borough, Whitehall Township (Hokendauqua CDP), and Whitehall Township (Fullerton CDP). An Indian population is concentrated in North Whitehall Township (Schnecksville Section), Alburtis Borough, and the immediate areas just north and west of the City of Allentown.

Attached to this Plan are maps which illustrate Lehigh County's demographics which are included in the Exhibits section of the Plan.

## **NA-35 Public Housing – 91.205(b)**

### **Introduction**

The Lehigh County Housing Authority’s mission is to “provide affordable housing in the most efficient and effective manner to qualified individuals in accordance with the rules and regulations prescribed by the U.S. Department of Housing and Urban Development, the Commonwealth of Pennsylvania, the County of Lehigh and/or any other entity providing funding for affordable housing programs.” The Lehigh County Housing Authority is not rated as a “troubled” agency by HUD.

The Lehigh County Housing Authority owns and professionally manages six (6) public housing communities and two (2) publicly subsidized housing communities, and administers the Section 8 Housing Choice Vouchers for the County. Three (3) of these public housing communities are senior apartment communities: George Dilliard Manor in Slatington; Ridge Manor in Emmaus; and Clarence Aungst Towers in Fountain Hill. The number of units in each community are as follows:

- 7th Street Village – 25 family units
- George Dilliard Manor – 75 elderly units
- Coplay Family – 25 units
- Ridge Manor – 75 elderly units
- Clarence Aungst Towers – 75 elderly units
- Fountain Hill – 75 Senior units and 14 family units

Many of the residents of these communities are 0%-30% AMI, and the Housing Authority faces difficulties reaching potential tenants for public housing with higher incomes. Generally, potential tenants above 30% AMI would prefer vouchers.

The waiting lists for both public housing and Section 8 Housing Choice Vouchers are closed. The breakdown of the waiting lists are 67% single-person households, 5% two-person households, 4% three-person households, and less than 1% four-person or more households, for a total of 2,802 households as of June 30, 2019 on the public housing waiting list (the last waiting list available). The breakdown of the waiting lists are 7% elderly households and 39% disabled households. 93% of households on the Section 8 Housing Choice Voucher waiting list are Extremely Low Income for a total of 1,084 households as of June 30, 2019 on the Section 8 Housing Choice Vouchers waiting list (the last waiting list available). Public housing occupancy is at 96.2%. The Lehigh County Housing Authority does not support any homeownership initiatives.

The Lehigh County Housing Authority's development division is known as Valley Housing Development Corporation. Valley Housing Development Corporation has built 289 units since its creation in 1983. These units are managed by the Housing Authority. 69 of the units are family units and the remaining 220 units are for elderly residents. Lehigh County owns an additional 433 units that are not Federally assisted.

### Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	15	289	1,401	26	1,365	10	0	0

**Table 22 - Public Housing by Program Type**

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

### Characteristics of Residents

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	
Average Annual Income	0	6,676	13,905	12,885	9,396	12,896	20,394		0
Average length of stay	0	5	6	6	3	6	1		0
Average Household size	0	1	1	1	1	1	1		0



	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers				Special Purpose Voucher
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
# Homeless at admission	0	0	1	1	1	0	0	0
# of Elderly Program Participants (>62)	0	1	209	487	0	484	3	0
# of Disabled Families	0	6	33	533	15	513	5	0
# of Families requesting accessibility features	0	15	289	1,401	26	1,365	10	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

**Race of Residents**

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	12	265	1,222	23	1,192	7	0	0
Black/African American	0	2	21	157	3	151	3	0	0
Asian	0	1	2	15	0	15	0	0	0
American Indian/Alaska Native	0	0	1	4	0	4	0	0	0

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Pacific Islander	0	0	0	3	0	3	0	0	0
Other	0	0	0	0	0	0	0	0	0
* includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

### Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	2	36	272	8	263	1	0	0
Not Hispanic	0	13	253	1,129	18	1,102	9	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

**Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:**

The Lehigh County Housing Authority has been found in compliance with Section 504. No additional compliance is needed.

The Lehigh County Housing Authority currently has 15 fully accessible units and 11 semi-accessible units. Additionally, LCHA owns thirty-five accessible units in non-Federally assisted properties.

**Most immediate needs of residents of Public Housing and Housing Choice voucher holders**

The most immediate needs of Public Housing residents is for employment, training, and transportation for shopping and medical services. The immediate needs of Housing Choice Voucher Holders is similar, but there is a lack of safe, sound, and affordable housing units that are available for rent and within the FMR allowance.

According to LCHA's 2019 Five Year and Annual Plan, the strategies for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year include preserving quality housing for the very low-income (50% or below AMI) and extremely low-income (30% or below AMI) residents in the County, in addition to expanding housing choices for the elderly, disabled, and Voucher Holders. With public housing occupancy at 96.2%, and a Housing Authority policy to keep site-based public housing waiting lists open, there is more demand than supply. Also, there is a shortage of availability of Section 8 Vouchers, which is evidenced by the fact that the waiting list is currently closed, and has been closed since August 16, 2016.

The Family Self-Sufficiency (FSS) Program gives Section 8 Voucher Holders the opportunity to set and reach goals that they set for themselves and their families, as well as save a significant amount of money. Section 8 Voucher Holders may also use their vouchers to realize the American dream of becoming a homeowner. Both of these opportunities are available to Section 8 Holders who choose to become participants in Section 8's Family Self-Sufficiency Program. There are two parts to the program. The first part of the program is the Self-Sufficiency program where participants have the opportunity to work towards and meet goals that they set for their families, as well as save money that will become theirs when they have completed their goals. The second part of the program is the Homeownership Program. In this part of the program, a Section 8 participant can choose to use his or her Section 8 Voucher to assist with the purchase and payment of a home.

**How do these needs compare to the housing needs of the population at large**

These housing needs are similar to the population at large based on the fact that there is a shortage of decent, safe, and sanitary housing in Lehigh County.

LCHA will continue to provide quality affordable housing by preserving, maintaining and promoting the 239 units of public housing and affordable housing. The Authority will work within HUD funding commitments to maximize the number of families assisted by the Housing Choice Voucher Program and

other programs. LCHA will continue its commitment to remain a part of local and affordable housing committees where the objective is to seek out methods of expanding affordable housing for seniors, low income families and individuals with disabilities. LCHA will continue to work with local, county, state and federal government to access programs and continue dialogue to improve programs that provide or have the potential to develop new or preserve existing affordable housing opportunities.

### **Discussion**

Lehigh County has identified the need for affordable housing that is decent, safe, and sanitary. The Lehigh County Housing Authority is a valuable resource in addressing that need. There is a significant number of households in the County that are at or below 50% of AMI and are affected by housing problems, severe housing problems and housing cost burdens.

LCHA will continue achieving high-performer standards of Federal programs. The LCHA will continue to improve communication with residents and provide a secure and friendly living environment that fosters tenant satisfaction and well-being.

LCHA will also continue to maintain their developments through preventative and ordinary maintenance as well as the capital fund program so that they remain quality housing for those in their community well into the future.

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## **NA-40 Homeless Needs Assessment – 91.205(c)**

### **Introduction:**

Lehigh County is part of the Eastern PA Continuum of Care, which is part of the Balance of State CoC. The Balance of State is split into five regional groups, called RHABs, each consisting of the governance structure for a CoC. Each of the RHABs/CoCs identify regional and local homeless issues; coordinate planning for projects; identify housing gaps and needs, strategies and priorities; review, select, and monitor projects; participate in the completion of the Exhibit 1 application; monitor Homeless Management Information System (HMIS) participation and implementation issues; and help coordinate and follow up on the point-in-time count and AHAR (Annual Homeless Assessment Report). Committees of the RHAB/CoC review and rank new and renewal projects annually. Finally, the RHABs/CoCs provide input and feedback to the PA Homeless Steering Committee on policies, priorities, and issues of statewide significance.

The Homeless Steering Committee consists of a collaboration between various State Agencies, Entitlement Grantees, and direct Homeless Service Providers split into two groups: An Entitlement Committee representing direct HUD-entitlement Jurisdictions, and the Balance of State. The roles of the Steering Committee are to identify & address policy issues, set state priorities, ensure coordination among public and private agencies, and maximize use of mainstream and state resources. It also is the lead entity in the Ten Year planning process; conducting research, coordinating the Continuum of Care (CoC) application process, and providing technical assistance to 18 regional Continuums of Care and individual grantees. It provides updates on discharge plans and state disaster planning. During monthly meetings the Regional Housing Advisory Board (RHAB) and Entitlement Committee Chairs report on regional, municipal and county activities and concerns. The group also addresses issues and topics of common interest that impact state and local homeless systems.

The Lehigh Valley RHAB addresses regional issues related to homelessness in both Lehigh and Northampton Counties. The City of Allentown coordinates with the Lehigh Valley RHAB to use its ESG funding to meet the needs of those in these Counties. Coordinated Entry in the region has been concentrated in the City of Allentown to address the high populations of homeless youth and youth at risk of becoming homeless.

## Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	51	327	378	0	69	0
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	161	56	217	0	34	0
Chronically Homeless Individuals	28	15	43	9	0	0
Chronically Homeless Families	5	0	5	2	0	0
Veterans	19	1	20	10	0	0
Unaccompanied Child	12	7	19	0	9	0
Persons with HIV	0	0	0	0	0	0

**Table 36 - Homeless Needs Assessment**

**Data Source Comments:** Eastern PA CoC 2019 Point In Time Count Summary

Indicate if the homeless population is:	Has No Rural Homeless
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**If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):**

**Chronically homeless individuals and families** – The Chronically Homeless are defined as an individual or family that is homeless and lives or resides in a place not meant for human habitation, a safe haven or in an emergency shelter. They have been homeless and living there continually for at least one year or on at least four separate occasions in the last three years. They have an adult head of household (or a minor head of household if no adult is present in the household) with a diagnosable substance use disorder, serious mental illness, developmental disability (as defined in Section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C 15002)), post-traumatic

stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability, including the co-occurrence or two or more to those conditions. The CoC has PSH beds dedicated for the chronically homeless, and they have adopted a policy to prioritize chronically homeless for PSH beds at turnover. According to the Point-In-Time count data, it was reported that there was 18 chronically homeless persons in 2017, 19 in 2018, and 28 in 2019. There were 5 chronically homeless families with children in 2017, 3 in 2018, and 5 in 2019 in Lehigh County. Because there is an increase in the number of chronically homeless individuals in the area, there is a need for increased outreach and services for the chronically homeless adult population.

**Families with children** – The Point In Time count for 2019 reported 51 homeless households with children in Lehigh County, for a total of 166 persons. There were approximately the same number of families and persons (49 and 157, respectively) in 2017, but numbers were higher in 2018 at 64 homeless households and 201 persons. Of the homeless households in 2019, none were unsheltered, but 8 families (22 persons) were in transitional housing and the remainder were in emergency shelter. Therefore, it can be estimated that there is a need for housing for 43 families (with 144 persons).

**Veterans and their families** – The Lehigh Valley Homeless Veteran Task Force was created in February 2015. The Lehigh County Office of Veterans Affairs coordinates the Task Force. The main SSVF provider serving Lehigh and Northampton Counties is Catholic Charities. This is the major resource for rapid re-housing and homelessness prevention. This organization has the financial resources to provide rental assistance immediately to qualifying veterans. Veterans are also linked to agency Support Coordinators by shelters and community resource providers. The Allentown Housing Authority administers the HUD-VASH program for the Lehigh Valley. This program is coordinated through the Wilkes-Barre VA Medical Center. There were 8 homeless veterans in 2017; 9 homeless veterans in 2018; and 19 homeless veterans in 2019. The increase in homeless Veteran in the area shows the need to restore funding for the programs that had previously been successful in addressing veteran homelessness.

**Unaccompanied youth** – Teens aging out of foster care, and young adults in the 18-24 transition stage are sometimes hard to locate. The Eastern PA CoC has aggressively targeted youths experiencing homelessness in response to their prevalence in Lehigh County. Ending homelessness among unaccompanied youth will require increased discharge planning from systems of care, family reunification services, positive youth development, independent living programs, youth-centered strategies, and targeted outreach. There were 12 unaccompanied youths counted in the 2019 Point-in-Time count for Lehigh County, which was a decrease from 21 in 2018. All unaccompanied youths counted were aged 18-24.

**Nature and Extent of Homelessness: (Optional)**

<b>Race:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
<b>White</b>	149	42
<b>Black or African American</b>	87	11
<b>Asian</b>	0	1
<b>American Indian or Alaska Native</b>	1	0
<b>Pacific Islander</b>	1	0
<b>Ethnicity:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
<b>Hispanic</b>	108	7
<b>Not Hispanic</b>	155	49

**Data Source Comments:** Eastern PA Continuum of Care

**Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.**

The CoC has reallocated its projects to better assist families with children that experience homelessness. There were 26 transitional housing projects that were converted to rapid re-housing to address the need of this population. The Point-In-Time count for 2019 indicated that there were 51 homeless households with children in Lehigh County, for a total of 166 persons. There were approximately the same number of homeless households and persons (49 and 157, respectively) in 2017, as in previous years, but numbers were higher in 2018 at 64 homeless households with 201 persons. Of the homeless households in 2019, none were unsheltered, but 8 families (22 persons) were in transitional housing and the remainder were in emergency shelters. Therefore, it can be estimated that there is a need for housing for 43 families (with 144 persons).

The number of homeless Veterans in Lehigh County has increased from 8 in 2017, to 9 in 2018, and 19 in 2019. Lehigh County had a viable program for addressing Veteran homelessness in 2017 and 2018. Because the program was effective, it was determined that the problem of Veteran homelessness had decreased substantially enough to end the program in the County and the funding was cut by the Federal government. The rise in Veteran homelessness in 2019 is a result of those funding cuts.

**Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.**

Throughout the Eastern PA CoC, the majority of homeless individuals and families, both sheltered and unsheltered, are white. Approximately 15% of homeless individuals are Black or African American throughout the Eastern PA CoC. All other racial groups, as identified by the Census, experience homelessness less prevalently in the Eastern PA CoC. One (1) homeless person was Asian, Nine (9) homeless persons were American Indian or Native Alaskan, and five (5) homeless persons were Native



Hawaiian or Other Pacific Islander. 21 persons were considered Multi-Racial. Approximately 18% of homeless individuals and families throughout the Eastern PA CoC were Hispanic or Latino.

**Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.**

Unsheltered Homelessness would refer to the segment of a homeless community who do not have ordinary lawful access to buildings in which to sleep, as referred to in the HUD definition as persons occupying "place not meant for human habitation", (examples: bus stop, beach, riverbed, van, RV, sidewalk). Many of the unsheltered homeless suffer from substance abuse and/or mental illness, and are reluctant to abide by the rules of shelters.

Sheltered Homelessness would refer to those in an emergency shelter, in transitional housing, or are exiting an institution where they temporarily resided lacking a fixed night time residence. People will be considered homeless if they are exiting an institution where they have resided for up to 90 days (it was previously 30 days). People who are losing their primary night time residence, which may be a motel, hotel or a doubled up situation within 14 days and lack resources or a support network to remain in housing, are considered sheltered homeless as well. The sheltered homeless typically do not have a steady source of income or any source of income.

The Point-In-Time Count for Lehigh County in 2019 reported a total of 327 homeless persons and 206 homeless households. Of these, only 56 persons (51 households), or 17%, were unsheltered. There were 53 persons (39 households) in transitional housing, and 218 persons (116 households) that were housed in emergency shelters. There were 51 homeless families with children, 28 chronically homeless families, 12 unaccompanied youths, and no persons with HIV/AIDS were counted in 2019. Of the 327 homeless people counted, 28 were considered chronically homeless, and 13 chronically homeless individuals were sheltered in emergency shelters. There were 19 Veterans (1 unsheltered), 6 with severe mental illness (none were unsheltered), 11 that were chronic substance abusers (5 unsheltered), 21 victims of domestic violence (1 unsheltered), and 70 with a disability of some kind. Of the 70 homeless with a disability of some kind, 20 (28.6%) were unsheltered. This indicates a need for greater outreach and shelter/housing options for these special needs groups.

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## **NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)**

### **Introduction:**

The assessment of non-homeless special needs includes the following:

- Elderly persons (age 65 years and older)
- Frail elderly
- Persons with mental, physical and/or developmental disabilities
- Persons with alcohol or other drug additions
- Persons with HIV/AIDS and their families
- Victims of domestic violence, dating violence, sexual assault, and stalking

The housing need of each of these groups was determined by consultation with social service providers and statistical information provided by social service provider agencies.

### **Describe the characteristics of special needs populations in your community:**

**Elderly Persons** are defined as persons who are age 65 years and older. According to the 2013-2017 American Community Survey, elderly persons represent 15.9% of the County's total population. Approximately 7.3% of the elderly population are age 75 years and older. In addition, roughly 56.6% of the total elderly population lives alone as a single person household (24.2% of the total number of households in the County).

**Frail Elderly** are those persons who are elderly and have a disability, ranging from a loss of hearing, vision difficulty, cognitive difficulty, ambulatory problems, and lack of self-help skills. It is estimated that approximately 35.0% of the total elderly population may be classified as frail elderly.

**Persons with mental, physical and development disabilities**, according to the ACS data for 2013-2017, persons with a disability comprise 13.9% (49,395 persons) of the total population of Lehigh County.

**Persons with HIV/AIDS and their families** comprise a small percentage of the County's overall population, but they are served by a network of service providers. Roughly 60% of those seeking help through Comprehensive Health Services of the Lehigh Valley are under 50% of the poverty line. Comprehensive Health Services assists over 1,000 people with HIV/AIDS, approximately 40 of whom have an active addiction. Approximately 40% of those infected with HIV/AIDS have a history of addiction.

**Victims of Domestic Violence, dating violence, sexual assault and stalking** is rapidly increasing both locally and nationally. Turning Point of the LV has been working with victims of domestic violence and sexual assault in the Lehigh Valley Region to provide free and confidential services to victims of domestic

and sexual violence and to the partners of victims. Turning Point of the LV serves approximately 2,600 victims/partners in Lehigh County per year.

**What are the housing and supportive service needs of these populations and how are these needs determined?**

**Elderly Persons** frequently age in place in Lehigh County, and require assistance in both housing and supportive services. The existing housing needs accessibility improvements, and the funding for elderly persons to make such improvements is not always readily available. Currently, the Area Agency on Aging has a freeze on accepting new clients, so organizations such as the Center for Vision Loss and Meals on Wheels must make up the gap in services.

**Frail Elderly** also frequently age in place in Lehigh County. Frail elderly require additional case work from supportive service organizations, and also require affordable housing. Low-income senior housing, which is provided by the Lehigh County Housing Authority, can assist these residents.

**Persons with mental, physical and developmental disabilities** typically live close to services because public transit is unreliable. Due to the lack of affordable housing, persons with disabilities are pushed further from the services that they need. Persons with mental disabilities need employment. The ARC of the Lehigh Valley works to educate the greater population on the benefit of employing persons with developmental disabilities. Persons with physical disabilities need assistance in accessing public and local organizations or with the completion of paperwork to access these organizations.

**Persons with HIV/AIDS and their families** receive supportive services from Comprehensive Health Services. Comprehensive Health Services provides medical care for persons with HIV/AIDS. Comprehensive Health Services will partner with organizations that assist with drug and alcohol addictions. All persons with HIV/AIDS will be required to treat HIV/AIDS before beginning the recovery process. Many of the people in this cohort will experience homelessness, but there are no homeless shelters specifically targeted to this population.

**Victims of Domestic Violence, dating violence, sexual assault and stalking** receive wrap around services from Turning Point of the LV. Turning Point of the LV will assist victims of domestic violence with immediate placement in their shelter or in local hotels when their beds are full. They will also work directly with employers to find jobs for the women they assist. Oftentimes, the lack of daycare makes it difficult for the victims to work on the jobs that Turning Point of the LV can secure. Turning Point also partners with Northampton Community College to provide job training for clients.

**Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:**

Persons with HIV/AIDS and their families comprise a small percentage of the County's overall population. However, many of those infected with HIV/AIDS are under the poverty rate, where roughly

60% of those seeking help through Comprehensive Health Services of the Lehigh Valley are under 50% of the poverty line. Comprehensive Health Services assists over 1,000 people with HIV/AIDS, approximately 40 of whom have an active addiction. Approximately 40% of those infected with HIV/AIDS have a history of addiction, but recovery centers will not serve this population unless they are actively being treated for HIV/AIDS.

There is a need for additional public transit, opioid counseling, legal representation, and affordable housing for those infected with HIV/AIDS.

**Discussion:**

The needs for these various groups of the Special Needs Population are only estimates, based on HUD data, U.S. Census Data, ACS data and interviews with housing providers and social service agencies. Accurate statistics are not available for all of these groups, so therefore “best estimates” are presented.

While many supportive service providers for the special needs population are located in the City of Allentown, their service area and clients are in Lehigh County, and sometimes throughout the Lehigh Valley Region. Though many services exist, there are still unmet needs in the Lehigh County area for additional services for these populations.

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## **NA-50 Non-Housing Community Development Needs – 91.215 (f)**

### **Describe the jurisdiction's need for Public Facilities:**

- Many of the municipalities in Lehigh County need to make improvements to their parks and recreational facilities.
- The recreation trail in the Borough of Slatington needs to be improved, including benches, additional off-street parking, and event space at the trailhead.
- The swimming pool in Coplay Borough was built in 1971 and is in need of major renovation work. The pool is currently inaccessible and not in compliance with ADA.
- The children's pool in Coplay Borough is in need of major renovation work. A splash pad could potentially replace the pool.
- Coplay Borough would like to install new basketball courts in its recreational facilities.
- The Borough Building in Coopersburg Borough needs to be made accessible. It also has asbestos insulation, which needs to be removed.
- There is a need in Coopersburg Borough to improve the rail trail access and improvements are also needed to other recreation facilities.
- Salisbury Township has a Park Master Plan, and is currently seeking funding to make the needed park improvements.
- The Lehigh Valley Planning Commission has created a Walk-Roll Plan that addresses the need to connect bicycle trails and alternative transit trails to sidewalks.
- The County has many parks that follow streams. There is a need to develop good buffers to prevent flooding.

### **How were these needs determined?**

These public improvements needs were determined through: the resident surveys; meetings with municipal officials; agency needs surveys; interviews with County staff, the County Commissioners, the County's Department of Community and Economic Development staff, the regional Planning Commission, and other County agencies; public hearing comments on needs; and the County's Comprehensive Plan. There are additional public facility needs and improvements that were not provided during the interview process.

### **Describe the jurisdiction's need for Public Improvements:**

- Truck freight traffic has taken a heavy toll on the roads in the area. The emergence of Lehigh County as a shipping and distribution hub has caused increased damage to infrastructure that was not built to meet current demands and weight limits.
- There is a need for ADA accessibility improvements across the County for the public facilities.

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- Stormwater runoff is a major problem in Lehigh County. The City of Allentown taxes stormwater runoff, but the smaller municipalities within the County cannot do this.
  - Many of the municipalities in Lehigh County have a mandate to improve stormwater mitigation but lack the funding to do so.
  - There are many public improvements projects that could be implemented more effectively through partnerships between municipalities in the County.
  - The Borough of Slatington has a misaligned intersection that causes traffic problems and potentially can cause accidents. The Borough needs to realign the street.
  - Stormwater in Slatington Borough will flow down the hills on the outskirts and create pools of water in the center of the Borough. There is a need to improve storm drainage to prevent flooding as a result of storms.
  - Coplay Borough is currently replacing its storm inlets when it repairs its streets. The Borough still needs to repair additional inlets which would mitigate flooding issues.
  - The Borough of Fountain Hill also has a need to mitigate stormwater pooling.
  - The Borough of Coopersburg needs to improve its traffic signalization and pedestrian crossings.
  - The Borough of Alburtis needs to separate its storm and sanitary sewers.

### **How were these needs determined?**

These public improvements needs were determined through: the resident surveys; meetings with municipal officials; agency needs surveys; interviews with County staff, the County Commissioners, the County's Department of Community and Economic Development staff, the regional Planning Commission, and other County agencies, public hearing comments on needs, and the County's Comprehensive Plan.

### **Describe the jurisdiction's need for Public Services:**

- There is a need throughout the County for improved service via public transit. Many of the public services in the County are difficult to access without a car and public transit is the best alternate solution.
- Many working families in Lehigh County require affordable childcare so they can earn a living.
- There is a need for adult education programs. Many adults lack the necessary skills for employment. While there are GED programs in the area, they do not reach the total unemployed or underemployed population.
- Meals on Wheels serves homebound disabled and elderly persons in Lehigh County. They have continued to serve more and more clients, but require a new kitchen.
- The Area Agency on Aging has currently put a freeze on new clients intakes. There is a need to assist senior citizens in the County with casework and "aging in place" programs.

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- There are no counseling programs for opioid addictions in the County, yet it is a serious problem in the County.
  - There are many adults who are illiterate in English, often because they are recent arrivals from Spanish-speaking countries in Central and South America and the Caribbean.
  - There is a need for English as a Second Language programs in the County. It is likely that there are far more persons that only speak Spanish in Lehigh County than currently estimated, especially given the number of Puerto Ricans moving to the area in the aftermath of Hurricane Maria in 2017.
  - Many of the poorer residents of Lehigh County lack the financial resources to purchase new shoes and clothing.
  - The number of students with special academic and educational needs in the County continues to grow. There is a need for more services to assist these students.
  - Adult education programs are also lacking for persons with special needs.
  - There are no universal pre-K programs in Lehigh County.
  - There is a need throughout communities in Lehigh County to educate people on the benefits of employing persons with special needs.
  - Smaller nonprofits struggle to build capacity to provide more services throughout the County.

### **How were these needs determined?**

These public service needs were determined through: the resident surveys; meetings with municipal officials; agency needs surveys; interviews with County staff, the County Commissioners, the County's Department of Community and Economic Development staff, the regional Planning Commission, and other County agencies; public hearing comments on needs; and the County's Comprehensive Plan.

## Housing Market Analysis

### MA-05 Overview

#### Housing Market Analysis Overview:

Lehigh County is an urban county in Eastern Pennsylvania with areas ranging from urban to rural. The City of Allentown is the County Seat of Lehigh County and it is the third largest City in the State of Pennsylvania. A portion of the City of Bethlehem also lies in Lehigh County, and suburban boroughs and townships located outside of the two cities are located within the County. Lehigh County and Northampton County are the core counties of the Lehigh Valley Region, which is the third largest metropolitan area in the Commonwealth of Pennsylvania. It is located approximately 100 miles west of New York City and approximately 60 miles north of Philadelphia, and is an attractive exurban community to people who work in either of those larger metropolitan areas. Lehigh County's economy was originally based on manufacturing. The County and region have many assets, including educational institutions and dense downtowns in the Cities of Allentown, Bethlehem, and Easton (located in Northampton County). Due to the area's connections to New York and Philadelphia, the region has become attractive to shipping companies and the number of shipping jobs in the area has grown substantially. Migrants from Latin America, mostly from Puerto Rico and the Dominican Republic, have also moved to Lehigh County over the last 20 years. This has led to Lehigh County becoming one of the fastest growing counties in the nation. Its population was 312,090 in 2000, and was 365,371 in 2017 according to the 2013-2017 American Community Survey estimates, which was a 17% growth rate over 17 years.

Approximately two-fifths (40.6%) of all the owner-occupied housing units were built before 1960, which is close to 60 years ago. About one-fifth (21.8%) of the housing was built between 1960-1979, and another fifth (22.4%) was built between 1980-1999. In the last twenty years, about 15.1% of the housing stock was built.

According to 2013-2017 American Community Survey Data, the County now has 89,550 owner-occupied housing units, with 71,355 of those housing units located outside the City of Allentown. There were 47,689 renter-occupied housing units, with 23,949 located outside the City of Allentown. In the county (outside the City of Allentown), 25.1% of housing is occupied by renters, and 74.9% of housing is owner-occupied.

The condition of the housing stock is adequate, but a small percentage of the housing stock is either neglected or not adequately maintained. According to the ACS data for 2013-2017, there are 7,857 vacant housing units in the County, 3,855 of which are in the City of Allentown. This means that Lehigh County has a vacancy rate of 5.4%, and 4.0% when the City of Allentown is excluded.

The median home value as of 2017 was \$201,600 and the median contract rent was \$841/month for the same time period.



## MA-10 Number of Housing Units – 91.210(a)&(b)(2)

### Introduction

According to the 2011-2015 ACS data, there are 86,943 total housing units. There are 82,854 occupied housing units (64,396 owner-occupied and 18,458 renter-occupied), which leaves 4,089 vacant housing units. The majority of the owner-occupied housing are 3 or more bedrooms (86% of all owner-occupied houses). Approximately 36% of all renter-occupied households have 2 bedrooms.

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	54,485	63%
1-unit, attached structure	16,145	19%
2-4 units	3,959	5%
5-19 units	6,147	7%
20 or more units	3,190	4%
Mobile Home, boat, RV, van, etc	3,017	3%
<b>Total</b>	<b>86,943</b>	<b>100%</b>

**Table 27 – Residential Properties by Unit Number**

Data Source: 2011-2015 ACS

### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	50	0%	689	4%
1 bedroom	719	1%	5,459	30%
2 bedrooms	8,120	13%	6,700	36%
3 or more bedrooms	55,507	86%	5,610	30%
<b>Total</b>	<b>64,396</b>	<b>100%</b>	<b>18,458</b>	<b>100%</b>

**Table 28 – Unit Size by Tenure**

Data Source: 2013-2017 ACS

### Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

The following number of units in Lehigh County that are assisted with Federal, State and Local Programs is as follows:

- **Public Housing** - There are 289 public housing units located in Lehigh County. The public housing developments are: 7th Street Village – 25 family units; George Dilliard Manor – 75 elderly units;

Coplay Family – 25 units; Ridge Manor – 75 elderly units; Clarence Aungst Towers – 75 elderly units; Fountain Hill – 75 Senior units and 14 family units. These public housing communities are all located outside the City of Allentown.

- **Low Income Housing Tax Credit (LIHTC)** – According to HUD’s Low-Income Housing Tax Credit Database, there are a total of 1,844 Low Income Housing Tax Credit units in Lehigh County, of which 1,491 are considered low-income units.
- **Housing Choice Vouchers** – The Housing Authority administers 1,652 vouchers that are tenant based.

**Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.**

Lehigh County Housing Authority does not expect to lose any affordable housing inventory during the FY 2019-2023 Five Year Consolidated Plan period.

**Does the availability of housing units meet the needs of the population?**

There is not a sufficient supply of rental housing units by various types within Lehigh County. There are 18,458 renter-occupied housing units with a 7.0% vacancy rate. When looking at homeownership supply, the market is extremely tight at 1.2% vacancy. There are approximately 1,034 units for rent. The problem is not only the “availability” of units in Lehigh County, but mainly the “affordability” and the “quality” of the units in the County. The need for affordable housing for singles is evidenced by the Housing Authority’s public housing waiting lists.

The majority of applicants on the public housing waiting list (67%) are waiting for a 1 bedroom unit. There are 1,877 persons on the public housing waiting list that are waiting for an efficiency or one bedroom apartment, 41% that identify themselves as elderly, and/or 56% with a disability.

The Section 8 Housing Choice Voucher waiting list includes applicants who are 88% extremely low income and 12% very low income. These applicants include 60% who are families with children, 14% are elderly, and 38% are families with disabilities. In addition to housing for those with extremely low incomes, the biggest needs for applicants on the Section 8 waiting list are for units for families with children, and for those with a disability. The Housing Authority’s Five Year Plan did not indicate the bedroom sizes requested for people on the waiting list for Section 8 Vouchers.

**Describe the need for specific types of housing:**

The greatest needs for residents of Lehigh County is housing for those that are extremely low income (0-30% AMI). Families with incomes at 0-30% of the median income are the population most represented on the Lehigh County Housing Authority waiting list.

The Valley Housing Development Corporation is currently working to meet the needs of residents of Lehigh County through its expansion. VHDC began in 1983 to take advantage of Low Income Housing Tax

Credits (LIHTC). In the past five (5) years, VHDC has created approximately 500 affordable housing units, either through construction or arranging funding to make the units profitable. VHDC also works to preserve affordable housing that already exists within the County.

**Discussion**

More than two-thirds of the housing in Lehigh County is homeownership housing. There is a need for a wider variety of housing types in Lehigh County, particularly with the lack of affordable housing in the area. Additional affordable rental housing is needed for residents of Lehigh County. There is a need for homeownership initiatives and rehabilitation to utilize existing housing units for homeowners.

## MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

### Introduction

The cost of housing has decreased from \$195,700 to \$191,700 in the last 11 years for a single-family home. Research on Zillow.com shows that the average list price for a home in the Lehigh County area in the Spring of 2019 was \$239,500, which is 23.5% higher than the average sold price in the county (\$182,700).

The cost of rent has increased by 16% during the period from 2000 to 2015, and the rental vacancy rate is 7.0% [MSA for 4<sup>th</sup> quarter 2018], which is close to the homeowner vacancy rate of 1.2%. These numbers seem to show demand focused on both rental housing and homeownership.

Because Lehigh County was not a Federal entitlement in the base year of 2000, its Census numbers include the other entitlement communities within the County: the City of Allentown and a portion of the City of Bethlehem, while the 2015 population only includes the Lehigh County entitlement community. For this reason, Lehigh County incorrectly appears to have lost home value below. Based on consultations and non-census related data it can be concluded that the County needs to continue its efforts to maintain affordable rental options for the elderly and disabled.

### Cost of Housing

	Base Year: 2000	Most Recent Year: 2015	% Change
Median Home Value	\$195,700	\$191,700	-2%
Median Contract Rent	\$685	\$792	16%

**Table 29 – Cost of Housing**

**Data Source:** 2000 Census (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	3,081	16.7%
\$500-999	9,608	52.0%
\$1,000-1,499	4,617	25.0%
\$1,500-1,999	855	4.6%
\$2,000 or more	259	1.4%
<b>Total</b>	<b>18,420</b>	<b>99.8%</b>

**Table 30 - Rent Paid**

**Data Source:** 2011-2015 ACS

### Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	1,023	No Data

% Units affordable to Households earning	Renter	Owner
50% HAMFI	2,509	2,273
80% HAMFI	8513	10,000
100% HAMFI	No Data	18,086
<b>Total</b>	<b>12,045</b>	<b>30,359</b>

**Table 31 – Housing Affordability**

Data Source: 2011-2015 CHAS

## Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	668	824	1,048	1,352	1,427
High HOME Rent	668	824	1,048	1,227	1,350
Low HOME Rent	653	700	840	970	1,082

**Table 32 – Monthly Rent**

Data Source: HUD FMR and HOME Rents

## Is there sufficient housing for households at all income levels?

Based on the HUD - CHAS data in the chart above, approximately 57% of housing is affordable for low-income families and individuals with incomes at or below 80% of Area Median Income. Additionally, 13% of renters and homeowners live in housing that is affordable for those at 50% or below of Area Median Income. However, when looking at different CHAS data, there is not sufficient housing for all income levels due to the cost over burden criteria for the following groups:

The following households have housing costs that are 0% to 30% of their AMI:

- White households = 53,254 or 64.3% of households
- Black/African American households = 850 or 1.0% of households
- Asian households = 2,283 or 2.7% of households
- Hispanic households = 2,497 or 3.0% of households

The following households have housing costs that are greater than 50% of their AMI:

- White households = 7,640 or 9.2% of households
- Black/African American households = 370 or 0.4% of households
- Asian households = 365 or 0.4% of households
- Hispanic households = 700 or 0.8% of households

When examining the percentage of each racial or ethnic group that have a housing problem, severe housing problem, or are housing cost overburdened, compared to that of the racial or ethnic group overall, a different picture presents itself. According to the 2011-2015 CHAS data, 72.5% of all White households, 52.3% of Black/African American households, 78.1% of Asian households, and 62.6% of Hispanic households are cost-overburdened by over 30%, while 10.4% of White households, 22.8% of Black households, 12.5% of Asian households, and 17.5% of Hispanic households were cost overburdened by over 50%. When examining housing problems for households at median income or less, 52.1% of White households, 82.8% of Black/African American households, 44.8% of Asian households, and 63.4% of Hispanic households have a housing problem. When comparing these numbers to the cost overburdened numbers, it seems as though cost overburdens are affecting White households, while housing problems are affecting Black households. The numbers are often higher for severe housing problems with 25.3% of White households, 59.1% of Black/African American households, 36.3% of Asian households, and 33.8% of Hispanic households experiencing severe housing problems. Overall, these numbers show that many residents of Lehigh County have a severe housing problem; African American/Black households in Lehigh County are much more likely to experience a housing problem or a severe housing problem than any other group.

### **How is affordability of housing likely to change considering changes to home values and/or rents?**

Median Home Value has dropped over the past two decades by 2%; however, housing affordability is still currently a chief concern for Lehigh County. Lehigh County has experienced a significant (16%) increase in the price of rental housing. Though the rental housing market only encompasses 21% of the overall housing market, it still will likely affect the affordability of housing for low income households. Also, the median income in Lehigh County has increased at a slower rate than the increase in the price of rental housing. This could cause additional housing affordability issues.

### **How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?**

According to RentOMeter ([www.Rentometer.com](http://www.Rentometer.com)), it is estimated that the Area Median Rent is for a one bedroom apartment is \$718 per month, for a two bedroom apartment is \$885 per month, for a three bedroom apartment \$1,150 per month, and for a four bedroom apartment \$1,193 per month. These estimates are less than the HOME rents and Fair Market rents for one, two, and three bedroom apartments in Lehigh County but higher than the Low HOME rent for one, two, three, and four bedroom apartments. Although market rents appear to be slightly lower than the HOME and Fair Market rents for Allentown, housing affordability is still the biggest housing problem for low-income families and individuals according to the CHAS data, indicating a need for housing subsidies and assistance.

**Discussion**

The housing market is a problem in Lehigh County. Affordability and housing quality are becoming an increasing problem for the lower income residents. There is a shortage of housing in the county and, with the influx of new residents, the housing market is getting worse. The supply of housing is not keeping pace with demand.

## MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Lehigh County contains 16,522 housing units that were constructed prior to 1950, which is 19.9% of all the housing units in the County. Approximately, 10,338 housing units are occupied by families with children and may contain a risk of lead-based paint within the unit. Of all the 86,943 total housing units, 82,879 are occupied. It is estimated that over 28% of the housing units are in need of housing rehabilitation work, from minor work to major rehabilitation work.

### Definitions

The following definitions are used in the table below:

“Selected Housing Conditions:”

- Over-crowding (1.01 or more persons per room)
- Lacking a complete kitchen
- Lack of plumbing facilities and/or other utilities
- Cost overburden

“**Substandard Condition:**” Does not meet code standards, or contains one of the selected housing conditions.

“**Suitable for Rehabilitation:**” The amount of work required to bring the unit up to minimum code standards and the existing debt on the property together are less than the fair market value of the property.

“**Not Suitable for Rehabilitation:**” The amount of work required to bring the unit up to minimum code standard exceeds the fair market value of the property after rehabilitation work is complete.

### Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	15,520	24%	7,183	39%
With two selected Conditions	228	0%	690	4%
With three selected Conditions	4	0%	45	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	48,660	76%	10,549	57%
<b>Total</b>	<b>64,412</b>	<b>100%</b>	<b>18,467</b>	<b>100%</b>

Table 33 - Condition of Units



Data Source: 2011-2015 ACS

**Year Unit Built**

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	12,083	19%	2,382	13%
1980-1999	17,779	28%	3,934	21%
1950-1979	22,619	35%	7,556	41%
Before 1950	11,917	18%	4,605	25%
<b>Total</b>	<b>64,398</b>	<b>100%</b>	<b>18,477</b>	<b>100%</b>

**Table 34 – Year Unit Built**

Data Source: 2011-2015 CHAS

**Risk of Lead-Based Paint Hazard**

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	34,536	54%	12,161	66%
Housing Units built before 1980 with children present	5,705	9%	4,633	25%

**Table 35 – Risk of Lead-Based Paint**

Data Source: 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)

**Vacant Units**

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	3,042	960	4,002
Abandoned Vacant Units	235	74	309
REO Properties	70	21	91
Abandoned REO Properties	0	0	0

**Table 36 - Vacant Units**

Data Source: ACS Five Year Estimates and RealtyTrac.com

**Need for Owner and Rental Rehabilitation**

Based on consultation with Lehigh County’s housing providers, homes and structures that are in need of rehabilitation tend to be in the older, built-up areas of the County. These areas often include the Boroughs and incorporated areas that are adjacent to the Cities of Allentown or Bethlehem, as opposed to the townships, where most of the housing stock is newer.

The older housing stock in areas such as the Borough of Slatington or the Borough of Catasauqua is often in poorer shape than the newer housing stock in the townships. There is a great need for owner

and rental housing rehabilitation in these areas. Many workers in the area require affordable housing and improvements to their current homes. Housing is usually not located near employment centers, and workers in the warehouse distribution centers with lower incomes often cannot afford to repair their homes. There is a need for owner and rental housing rehabilitation work for this subset of County residents.

Much of the high-end housing development is taking place in the City of Allentown. Because the prices in Allentown are rising, especially in the Downtown, residents of Allentown that are being priced out of the area move to the outskirts of the City of Allentown, where the housing stock is in poorer condition. Furthermore, the City of Allentown has only recently reinstated their housing rehab program in 2019 after many years of being on hold. This creates a greater demand for housing in Lehigh County, where homeowners and renters have access to newer housing stock and housing rehabilitation programs. Funding is available for county housing rehabilitation projects through multiple sources and programs, including Affordable Housing Trust Funds. The Lehigh Valley Community Land Trust also purchases housing within the County to assist in providing affordable housing.

### **Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards**

According to the 2011-2015 CHAS data, 12,161 renters live in housing constructed before 1980 and are at risk of lead-based paint, and 34,536 homeowners live in similar housing and face similar risks.

There is a need for a housing advocacy program for tenants to make them aware of their rights for decent, safe, sanitary, and accessible housing. The County includes lead disclosures in its applications for housing rehab programs, and ensures that any Federal or State lead-based paint regulations will be followed by contractors that work on housing rehabilitation programs.

### **Discussion**

The County needs to continue to spend funds to rehabilitate homes and to construct new housing to increase the housing supply in the high-demand areas of the County. The County also needs to continue to preserve its existing housing to lead to revitalization in areas of the County that are lower income. The need for affordable rental housing is the largest unmet need in Lehigh County.

### **Emergency Management:**

Lehigh County consulted with the County Emergency Manager to determine the emergency management needs of the County. Flooding is the primary emergency in Lehigh County, followed by fires, hurricanes, and other natural disasters. Renters in Lehigh County tend to lose the most property in any flood or other emergency because they do not have insurance. There is additional need for storm sewer separation in the County to mitigate flooding, and there is a need to backfill areas along stone roads in more rural areas of the County. Each jurisdiction in the region creates its own mitigation strategy that is complemented by the emergency management plan should such an emergency occur.

## MA-25 Public and Assisted Housing – 91.210(b)

### Introduction

The Lehigh County Housing Authority (LCHA) is a high performing housing authority that owns and professionally manages family communities and elderly/disabled rental apartments. The apartments are located throughout Lehigh County. LCHA has a total of 289 public housing units, with 15 fully accessible units and 11 semi-accessible units. Additionally, LCHA has 433 non-Federally assisted units. The Housing Authority manages Section 8 Housing Choice Vouchers. The Housing Authority administers 1,652 baseline vouchers, with 1,100 under contract as of March, 2019.

There are a total of 289 public housing units in Lehigh County. According to the Five Year and Annual Plan for 2019-2023, LCHA's progress in meeting their mission and goals states that LCHA achieved high performer status. Lehigh County Housing Authority received inspection scores over 90 in 2013, 2014, 2015, and 2016 and was considered a "high performer."

### Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	16	289	1,652	26	1,626	0	849	0
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

**Table 37 – Total Number of Units by Program Type**

Data Source: PIC (PIH Information Center)

### Describe the supply of public housing developments:

- 7th Street Village – 25 family units
- George Dilliard Manor – 75 elderly units
- Coplay Family – 25 units
- Ridge Manor – 75 elderly units
- Clarence Aungst Towers – 75 elderly units
- Fountain Hill – 75 Senior units and 14 family units

LCHA also owns and manages Section 8 Housing for families at Catasauqua Family Apartments and elderly and disabled apartments at Franklin Balliet Apartments at Macungie Meadows. Catasauqua Family Apartments consists of ten (10) units.

**Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:**

The 289 public housing units are in good condition. Through its Capital Program, repaired rehabilitation work takes place on a regular basis.

**Public Housing Condition**

Public Housing Development	Average Inspection Score
Lehigh County Housing Authority	91

**Table 38 - Public Housing Condition**

**Describe the restoration and revitalization needs of public housing units in the jurisdiction:**

The Lehigh County Housing Authority recently submitted its Five Year Plan Update for its FY 2019 through FY 2023 Public Housing Capital Fund Program Grant. The Capital Fund Grant award for FY 2019 was \$506,299. The LCHA proposed various activities to improve the overall living environment in the Authority's public housing communities. The activities are as follows:

**2019 Fund:**

- Replacement of windows at Clarence Aungst Towers
- Rehabilitation of kitchens at Cherokee and Delaware Apartments
- Replacement of siding, sheeting, and windows at 17<sup>th</sup> Street Village

**2020 Fund:**

- Parking lot site improvements at Ridge Manor
- Rehabilitation of kitchens at Cherokee and Delaware Apartments
- Replacement of siding, sheeting and windows at 17<sup>th</sup> Street Village
- Increase the size of the parking lot at George Dilliard Manor

**2021 Fund:**

- Increase the size of the parking lot at George Dilliard Manor
- Replace apartment light fixtures at George Dilliard Manor
- Replace doors and frames at 17<sup>th</sup> Street Village
- Rehabilitate bathrooms at Cherokee and Delaware Apartments

**2022 Fund:**

- Rehabilitate kitchens at Cherokee and Delaware Apartments
- Rehabilitate kitchens at Ridge Manor

**2023 Fund:**

- Rehabilitate kitchens at Ridge manor

**Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:**

The Lehigh County Housing Authority currently does not have active resident councils at any of its communities. Though attempts have been made to create resident councils, they have all dissolved.

Section 8 Voucher Holders have the opportunity to set and reach goals that they set for themselves and their families, as well as saving a significant amount of money. Section 8 Voucher Holders may also use their vouchers to realize the “American Dream” of becoming a homeowner. Both of these opportunities are available to Section 8 Voucher Holders who choose to become participants in Section 8’s Family Self-Sufficiency Program. There are two parts to the program. The first part of the program is the Self-Sufficiency program where participants have the opportunity to work on meeting goals that they set for their families as well as save money that will become theirs when they have completed their goals. The second part of the program is the Homeownership Program. In this part of the program, a Section 8 participant can choose to use his or her Section 8 voucher for the purchase and mortgage payments of a home. Each part of the Self-Sufficiency program is detailed below.

Family Self-Sufficiency (FSS) is a voluntary HUD program that encourages and assists families to become self-sufficient. Anyone currently on the Section 8 Housing Choice Voucher Program is eligible for this program. FSS offers a financial incentive to families through an escrow account, which is based on an increase in a family’s earned income. An example of an increase in earned income would be when a family member has a pay raise, obtains employment or has an increase in his or her working hours that results in an increase in the portion of rent that the family pays each month. For example, if a family member begins working 40 hours per week, and the family’s rent increase \$25.00 dollars per month, that \$25.00 dollars goes into an escrow account that the Housing Authority establishes for the family. This account becomes available to the family when the family successfully completes their FSS Contract of Participation. Depending upon each participant’s situation, the FSS Program can connect tenants with job training, resource planning, credit repair resources, basic skills education, high school equivalency (GED) programs, post-secondary education, and assistance with securing meaningful employment. Advisors provide emotional support, case management, and personalized assistance.

The Housing Authority does not support any other homeownership initiatives.

**Discussion:**

Lehigh County Housing Authority is the primary provider of housing for the very low- and extremely low-income residents of Lehigh County. The Lehigh County Housing Authority assists individuals and families through its Public Housing communities, Low Income Housing Tax Credit communities, and Section 8 Housing Choice Vouchers program.

## MA-30 Homeless Facilities and Services – 91.210(c)

### Introduction

The Lehigh Valley Regional Homeless Advisory Board (RHAB) implements the CoC's policies to address homelessness in Lehigh County. It is comprised of various stakeholders from Lehigh and Northampton Counties, including City of Allentown, City of Bethlehem, and County Departments, social service agencies, veterans support groups, faith-based organizations, homeless advocates, and other interested parties. In Lehigh County, Valley Youth House, Turning Point of the Lehigh Valley, Lehigh Valley Conference of Churches, YMCA of Lehigh County, Salvation Army, Catholic Charities, and County service groups provide housing and supportive services for the County's homeless and at risk of being homeless population. The Lehigh Valley RHAB's mission is: "Covering all communities in Lehigh and Northampton Counties, the Lehigh Valley RHAB is a consortium of individuals, agencies and other stakeholders that direct and coordinate community-wide efforts toward ending chronic homelessness." The Lehigh Valley RHAB absorbed the City of Allentown's Homelessness Commission in 2015 to better plan services for the homeless from a regional perspective.

### Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	187	0	30	110	0
Households with Only Adults	75	64	36	136	0
Chronically Homeless Households	n/a	n/a	n/a	0	n/a
Veterans	n/a	n/a	n/a	2	n/a
Unaccompanied Youth	n/a	n/a	6	n/a	n/a

**Table 39 - Facilities and Housing Targeted to Homeless Households**

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**Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons**

Enrollment in mainstream services and other subsidized housing resources are available through COMPASS, the state's web-based system for accessing resources. The CoC distributes the updated list of Housing and Homeless Liaisons in every PA County Assistance Office to all agency caseworkers in the Region in order to facilitate linkages and eliminate barriers to accessing mainstream resources. Case workers use COMPASS to access Medicaid, Children's Health Insurance Program, mental health and substance abuse care, Child Care Works Program, Food Stamps, TANF-funded services, Energy Assistance, School Meals, Home and Community Based Services, Long Term Care, and Select Plan for Women. They also work with PA's Health Insurance Marketplace providers to access health insurance under the Affordable Care Act and coordinate with the VA Medical Centers to improve access to VA medical services.

The CoC provides up-to-date information to program staff at the County level during homeless coalition meetings. The Executive Housing Director of the Pennsylvania Department of Human Services is also a member of the Governing Board of the CoC and provides relevant updates. The CoC undertakes this strategy to increase collaboration between local service provider coalition members.

Local providers help clientele access mainstream health and mental health services and job training and education. Many homeless populations, particularly young adult homeless populations, are difficult to reach with mainstream services. In response, Lehigh Valley Health Network's Comprehensive Health Services brings health care services to the locations of the homeless. Organizations such as Workforce LV provide services that could be utilized by homeless populations for employment training.

**List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.**

The Eastern PA CoC does not directly receive ESG funds. ESG funds for the Lehigh Valley RHAB are administered through the Pennsylvania Department of Community and Economic Development (DCED) in a partnership with the City of Allentown, which also receives ESG funds as a direct HUD ESG entitlement. DCED has developed a process for allocating funds, evaluating outcomes, and developing policies and procedures. The CoC consults with DCED regarding past program performance and involvement of ESG applicants. To supplement the ESG funds received by the City of Allentown, Lehigh County DCED completes an application for the PA Department of Community and Economic Development to obtain more ESG funds for community homeless service providers. It is to be determined if this application will be approved.



The Lehigh County Conference of Churches is currently the largest provider of homeless services in Lehigh County. Previously, the Conference of Churches ran the winter weather emergency shelter during the coldest weeks of the year, but this role has shifted to the YMCA for homeless males and to the Salvation Army for homeless females. The Conference of Churches partners with Catholic Charities to provide food at meal services, though both organizations would like to accomplish more in that area. The Conference of Churches provides emergency shelters for needy families, and has also used motels to assist with Rapid Rehousing. The Conference of Churches has created a smaller program to assist those released from prison to find housing.

Valley Youth House is another major provider of services for the homeless, though their programs focus on the youth of 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 projects. 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 LV 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 program's funding was cut.

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## **MA-35 Special Needs Facilities and Services – 91.210(d)**

### **Introduction**

Lehigh County has identified the priorities for services and facilities for its special needs population. This includes the elderly, frail elderly, persons with disabilities, persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, and public housing residents.

**Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs**

The following needs and objectives are established under this Five Year Consolidated Plan:

- **Elderly** - rehabilitation of existing owner-occupied housing units and construction of new affordable and accessible apartments
- **Frail Elderly** - construction of new affordable and accessible apartments with supportive services; removal of architectural barriers in their homes
- **Persons with Disabilities** - rehabilitation of existing housing units for accessibility improvements, reasonable accommodations to rental housing units, destruction of supportive housing units, and supportive employment opportunities
- **Alcohol and Other Drug Addictions** - supportive services to end addictions and training to re-enter the work force
- **Public Housing Residents** - Down payment homebuyer assistance, job training and job opportunities, housing counseling for home ownership, and assistance in finding affordable housing
- **Victims of Domestic Violence** – Need for additional temporary shelters, supportive services and training programs, and permanent supportive housing options

**Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing**

Hospitals and state institutional facilities must have written discharge policies for "appropriate referral and transfer plans" including evaluation of a patient's capacity for self-care and possibility of being cared for in "the environment from which s/he entered the hospital." The actual discharge varies with the individual being discharged, their primary and behavioral health needs, and resources and supports

available. While institutions try to send individuals home or to family, sometimes they discharge to a nursing home, rehab hospital or as last resort, non-HUD funded shelter. Some shelters have protocols against accepting certain individuals directly from a hospital. Plans are coordinated with foster care, health care, mental health care, and correctional facilities. The CoC conducts additional discharge planning for youth exiting systems of care to adhere to its strategy of preventing youth homelessness.

**Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)**

Lehigh County proposes as its "Vision" of the Five Year Consolidated Plan the following under "Other Special Needs Strategy":

**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.

**For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))**

Not Applicable.

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## **MA-40 Barriers to Affordable Housing – 91.210(e)**

### **Negative Effects of Public Policies on Affordable Housing and Residential Investment**

Lehigh County's 2018 Analysis of Impediments to Fair Housing Choice has identified the following impediments, along with goals and strategies to address those impediments and affirmatively further fair housing 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.

**Goal:** Increase the supply of affordable housing by new construction and rehabilitation of various types of housing that is affordable to lower income households.

**Strategies:** In order to address the need and achieve the goal for more affordable housing, the following activities and strategies should be undertaken:

- **1-A:** Continue to promote the need for affordable housing by supporting and encouraging private developers and non-profits to develop, construct, and/or rehabilitate housing that is affordable.
- **1-B:** Encourage and promote the development, construction, and/or rehabilitation of mixed-income housing in areas of the County which do not have a concentration of low-income households.
- **1-C:** Encourage and promote the development, construction, and/or rehabilitation of affordable housing in mixed-use properties with retail/office space on the lower levels and residences above.
- **1-D:** Support financially, the rehabilitation of existing housing owned by seniors and lower-income households to conserve the existing affordable housing stock in the County.
- **1-E:** Provide financial and development incentive to private developers and non-profits to construct and/or rehabilitate affordable housing.
- **1-F:** Continue to work with the Lehigh Valley Planning Commission Housing Study Group to promote the development, construction, and rehabilitation of affordable 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.

**Goal:** Increase the supply of accessible housing by new construction and rehabilitation of accessible housing for persons who are disabled.

**Strategies:** In order to address the need and achieve the goal for more accessible housing, the following activities and strategies should be undertaken:

- **2-A:** Continue to promote the need for accessible housing by supporting and encouraging private developers and non-profits to develop, construct, and/or rehabilitate housing that is accessible to persons who are disabled.
- **2-B:** Support financially, improvements to single-family owner-occupied homes to make them accessible for the elderly and/or disabled so they can continue to live in their homes.
- **2-C:** Encourage and promote the development of accessible housing units in multi-family buildings as a percentage of the total number of housing units.
- **2-D:** Encourage and financially support landlords to make accommodations to units in their building so persons who are disabled can reside in their apartments.
- **2-E:** Enforce the Americans with Disabilities Act (ADA) and the Fair Housing Act (FHA) in regard to making new multi-family housing developments accessible and visitable for persons who are physically disabled.

**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.

**Goal:** Eliminate physical, economic, and social barriers in Lehigh County and increase housing choices and opportunities for low-income households and members of the protected classes throughout Lehigh County.

**Strategies:** In order to achieve the goal for more housing choice, the following activities and strategies should be undertaken:

- **3-A:** Deconcentrate pockets of racial and ethnic poverty by providing affordable housing choices for persons and families to move outside of these areas.
- **3-B:** Support and promote the development of affordable housing in areas of opportunity where low-income persons and families may move.
- **3-C:** Support and promote the planning and model zoning efforts of the Lehigh Valley Planning Commission to eliminate "exclusionary zoning" and land development ordinances which restrict the development of affordable housing.
- **3-D:** Eliminate architectural barriers in public accommodations, public facilities, and multi-family new housing developments.
- **3-E:** Encourage LANta (the public transportation system) to develop additional routes to provide better access to job opportunities for low-income households.

**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.

**Goal:** Improve knowledge and awareness of the Fair Housing Act (FHA), related housing and discriminatory laws, and regulations, so that the residents in Lehigh County can Affirmatively Further Fair Housing (AFFH).

**Strategies:** In order to address the need and achieve the goal of promoting open and fair housing, the following activities and strategies should be undertaken:

- **4-A:** Continue to educate and make residents aware of their rights under the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).
- **4-B:** Continue to educate and make realtors, bankers, and landlords aware of discriminatory housing policies and to promote fair housing opportunities for all County residents.
- **4-C:** Sponsor and participate in a “Regional Housing Summit” to discuss housing needs and approaches to achieve more affordable housing in the County.
- **4-D:** Continue to financially support the Fair Housing organizations and legal advocacy groups to assist persons who may be victims of housing discrimination and/or not aware of how to file a housing complaint.
- **4-E:** Continue to monitor the data from the Home Mortgage Disclosure Act (HMDA) to ensure that discriminatory practices in home mortgage lending not take place.

**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.

**Goal:** Improve the job opportunities in the County, which will increase household income and make it financially feasible to live outside concentrated areas of poverty.

**Strategies:** In order to address the need and achieve the goal for better economic opportunities, the following activities and strategies should be undertaken:

- **5-A:** Encourage and strengthen partnerships between public and private entities to promote economic development, improve the local tax base, and create a sustainable economy.
- **5-B:** Promote and encourage the expansion of existing commercial and light industrial enterprises, which will create more employment opportunities.
- **5-C:** Provide financial and development assistance to enterprises, which will create new job opportunities and higher wages for County residents.
- **5-D:** Identify development sites for potential private investment and/or expansion of existing enterprises.
- **5-E:** Continue to improve the infrastructure to underdeveloped areas of the County to promote new development and create new job opportunities.
- **5-F:** Continue to partner with Lehigh Career & Technical Institute to develop training programs for unemployed and underemployed persons in the County.

## MA-45 Non-Housing Community Development Assets – 91.215 (f)

### Introduction

The goal of Lehigh County's Department of Community and Economic Development is to help to plan and design the County's form and character, support community values, preserve the environment, promote the wise use of resources and protect public health and safety through code enforcement. The Department of Community and Economic Development is the administrator of the Community Development Block Grant. The office also provides outreach and technical assistance for a variety of downtown and County-wide community and economic development projects.

### Economic Development Market Analysis

#### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	420	452	0	0	0
Arts, Entertainment, Accommodations	8,732	10,808	9	9	0
Construction	4,195	4,161	5	3	-1
Education and Health Care Services	20,678	27,295	22	23	1
Finance, Insurance, and Real Estate	5,320	5,068	6	4	-1
Information	1,855	1,789	2	2	-1
Manufacturing	11,167	12,929	12	11	-1
Other Services	3,093	2,935	3	2	-1
Professional, Scientific, Management Services	9,645	10,726	10	9	-1
Public Administration	0	0	0	0	0
Retail Trade	10,885	14,604	12	12	1
Transportation and Warehousing	5,051	10,967	5	9	4
Wholesale Trade	4,799	7,028	5	6	1
Total	85,840	108,762	--	--	--

**Table 40 - Business Activity**

**Data Source:** 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

**Labor Force**

Total Population in the Civilian Labor Force	116,091
Civilian Employed Population 16 years and over	109,160
Unemployment Rate	5.95
Unemployment Rate for Ages 16-24	18.31
Unemployment Rate for Ages 25-65	4.03

**Table 41 - Labor Force**

Data Source: 2011-2015 ACS

Occupations by Sector	Number of People
Management, business and financial	27,979
Farming, fisheries and forestry occupations	4,188
Service	9,261
Sales and office	27,450
Construction, extraction, maintenance and repair	7,709
Production, transportation and material moving	6,226

**Table 42 – Occupations by Sector**

Data Source: 2011-2015 ACS

**Travel Time**

Travel Time	Number	Percentage
< 30 Minutes	70,475	69%
30-59 Minutes	23,652	23%
60 or More Minutes	8,545	8%
<b>Total</b>	<b>102,672</b>	<b>100%</b>

**Table 43 - Travel Time**

Data Source: 2011-2015 ACS

**Education:**

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	2,966	451	1,986
High school graduate (includes equivalency)	24,800	1,363	6,499
Some college or Associate's degree	26,050	1,308	4,478



Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Bachelor's degree or higher	37,759	1,554	5,669

**Table 44 - Educational Attainment by Employment Status**

Data Source: 2011-2015 ACS

## Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	152	157	317	946	2,526
9th to 12th grade, no diploma	1,362	650	719	2,658	4,012
High school graduate, GED, or alternative	5,418	5,257	6,630	20,775	15,620
Some college, no degree	5,658	4,309	4,405	10,659	4,865
Associate's degree	1,077	2,434	3,271	6,768	1,799
Bachelor's degree	2,075	7,600	6,918	12,585	4,343
Graduate or professional degree	58	3,479	4,482	9,959	3,620

**Table 45 - Educational Attainment by Age**

Data Source: 2011-2015 ACS

## Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	22,604
High school graduate (includes equivalency)	30,943
Some college or Associate's degree	36,943
Bachelor's degree	53,576
Graduate or professional degree	74,498

**Table 46 – Median Earnings in the Past 12 Months**

Data Source: 2011-2015 ACS

**Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?**

The Education and Health Care Services Sector is the largest single sector in terms of number of employees in Lehigh County, at 20,678 employees. Following the Education and Health Care Services sector, Manufacturing employs the second-most employees at 11,167. Retail trade also employ more than 10,000 employees. Lehigh County currently has 27,295 jobs in the Education and Health Care Services Sector, showing a slight imbalance between jobs available and employees in that sector with 75% of jobs in that sector filled. Similarly, 80.7% of the 10,808 jobs in Arts, Entertainment, Accommodation sectors are filled. There are 10,967 jobs in Transportation and Warehousing sector, with only 46.0% of jobs filled in this sector.

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**Describe the workforce and infrastructure needs of the business community:**

- There is an imbalance between the number of jobs available and the number of employees qualified to fill the positions. Workforce Board LV attempts to help unemployed persons find employment.
- Lehigh County has become a major shipping and distribution hub.
- The increase in truck traffic causes the infrastructure in the area to age quickly. Infrastructure near the shipping and distribution centers is in need of repairs and replacement.
- Shipping companies tend to not be located on public transit lines. This makes it difficult for employees without vehicles to access these jobs.
- Carpooling and vanpooling have only been successful in select communities, such as immigrant groups. Otherwise, carpooling and vanpooling programs fall apart.
- Federal apprenticeship programs are generally underutilized, though they are available.
- Many employees need daycare for their children. Daycare is a major issue for all potential workers.
- Community Colleges in the area have seen shrinking enrollment, and people are not utilizing these services to gain employment.
- Workforce Board LV is starting a pilot program to provide wrap-around services for 13-16 people seeking employment in the Lehigh Valley.
- A portion of Lehigh County's immigrant population is very educated, but cannot access jobs with higher compensation rates due to their limited English proficiency.
- There is a need for improved career readiness programs across the County.

**Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.**

Lehigh County is a large geographic area that expects consistent population growth and subsequent economic growth. ADP® plans to open a large headquarters in downtown Allentown, which will bring a large number of jobs to the region and bring additional workers. Benefits to Allentown will cause economic growth in the surrounding peripheral communities in the County and provide additional opportunities for job growth. Additional workforce development and job training will be required to fill positions at ADP®, as well as other positions that may open with the continued revitalization of downtown Allentown.

There are transportation and shipping hubs that have developed in Lehigh County. These developments require additional employees and infrastructure. Many of these hubs are located in industrial parks that have few transit links for employees. The heavy freight traffic also causes the infrastructure in the area to deteriorate faster than initially anticipated at the time of construction. There is a need for additional infrastructure and improved infrastructure to reach these transportation and shipping hubs.

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**How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?**

With employment in Lehigh County focused on Education/Health Care and the Manufacturing Sectors, the County has a relatively even mix of Associate/Bachelor/Graduate degree individuals (42%) and High School Graduate/Some College individuals (50%). It should be noted, that over 60% of the workforce in Lehigh County is above the age of 45. Additionally, of that older workforce age 45 and above, 30,507 (26%) have a bachelor's degree or higher.

**Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.**

Workforce Board Lehigh Valley has multiple initiatives to train workers in the region. Workforce Board Lehigh Valley provides training for multiple types of positions and attempts to fill gaps that arise from the poor school system in the area. They are beginning a pilot program for 13-16 individuals seeking employment in the Lehigh Valley which will include wrap-around services for trainees. Communities in Schools also seeks to fill these gaps with career supports and soft skill education for at-risk youth.

There is also a need to assist workers that do not speak English. There is a population of workers who have advanced degrees, but their English skills are lacking and they are underemployed. Lehigh County works with Lehigh Carbon Community College and the Literacy Center to provide ESL lessons to residents of the County at various levels of education. The Literacy Center also provides Adult Basic Education and GED courses for workforce development.

**Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?**

No.

**If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.**

Lehigh County does not participate in a Comprehensive Economic Development Strategy.

Lehigh Economic Development Corporation seeks to meet the needs of employers in the area with the goal of attracting larger businesses to the region. They market the land, space, and talent for companies to come to the Lehigh Valley Region and either open a business or grow their business. Lehigh Economic Development Corporation works to market the region to employers, which benefits the residents of Lehigh County and creates opportunities for community and economic development in the county.

**Discussion**

As of April 2019, the unemployment rate in Lehigh County was 3.5%, compared to 3.4% for Lehigh Valley Region, 3.8% for the Commonwealth of Pennsylvania, and 3.6% for the Country as a whole. The County has enjoyed a relatively low unemployment rate; however, the need for jobs and job training for the disabled and very low income remains a priority.

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## **MA-50 Needs and Market Analysis Discussion**

### **Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")**

Generally, housing problems in Lehigh County are concentrated in the older areas of the County. These are typically the incorporated sections of the County, such as the Boroughs of Alburtis, Catasauqua, Coopersburg, Coplay, Emmaus, Fountain Hill, Macungie, and Slatington. The Borough of Slatington in particular has a concentration of housing problems.

### **Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")**

There are no Racially Concentrated Areas of Poverty or Ethnically Concentrated Areas of Poverty (RCAPS or ECAPS) in Lehigh County's jurisdiction.

An area, which has a higher concentration of minorities than the County as a whole, can be considered a place where these families are concentrated. The following areas have higher rates of minority residents when compared to the County as a whole according to American Community Survey data: Fountain Hill Borough has a population which is 20.78% Hispanic and 6.94% Black; Macungie Borough has a population which is 9.58% Hispanic; Slatington Borough has a population which is 5.58% Hispanic; Lower Macungie Township (Ancient Oaks CDP) has a population which is 6.22% Asian, 5.78% Hispanic, and 3.78% Black; and Whitehall Township (Fullerton CDP) has a population which is 21.04% Hispanic, 9.55% Asian, and 7.26% Black.

According to National Origin maps and data, there is a higher rate of concentration of residents by national origin than by race. A Vietnamese population is concentrated in Lower Macungie Township (Ancient Oaks CDP), Macungie Borough, and Upper Saucon Township. There are Vietnamese and German populations in Whitehall Township (Hokendauqua CDP and Fullerton CDP respectively). There are also German populations in Lower Macungie Township (Ancient Oaks CDP), and Upper Saucon Township. Residents of Chinese descent are concentrated in Coopersburg Borough, Upper Macungie Township, and Catasauqua Borough. Descendants of the Dominican Republic are concentrated in the areas around Emmaus Borough, Whitehall Township (Hokendauqua CDP), and Whitehall Township (Fullerton CDP). An Indian population is concentrated in North Whitehall Township (Schnecksville Section), Alburtis Borough, and the immediate areas just north and west of the City of Allentown.

### **What are the characteristics of the market in these areas/neighborhoods?**

These boroughs and sections of townships vary in their characteristics, where some of the municipalities have active commercial districts while others have vacant commercial properties that line their business districts. The housing stock in these areas also range from "sound" to "in need of major rehabilitation."

There are other portions of the County that are rural in character but have a high demand for growth in industry and housing in these areas. The County seeks to balance the development and preservation of farmland.

**Are there any community assets in these areas/neighborhoods?**

Multiple municipalities in Lehigh County have historic districts that can provide a focal point for rehabilitation and growth within their communities. There are historic districts in the Boroughs of Catasauqua, Coopersburg, Fountain Hill, and Slatington.

There are strong linkages between many of the governmental organizations, non-profits, and private industries in Lehigh County. Because of stakeholders' willingness to collaborate, there is the potential for partnerships that can vastly improve neighborhoods.

**Are there other strategic opportunities in any of these areas?**

The continued growth of Lehigh County's population is a major opportunity for the area. Population growth will lead to a demand for improved housing and amenities, and subsequent private investment to meet these demands.

Much of the high growth in Lower Saucon Township can lead to its designation as an Opportunity Zone. However, the land prices in this area are high, and that can act as a barrier.

## Strategic Plan

### SP-05 Overview

#### Strategic Plan Overview

The "Vision" of this Five Year Consolidated Plan is to serve as a consolidated planning document, an application, and a strategic plan for Lehigh County. As part of the Five Year Consolidated Plan, the community develops goals and objectives. The following strategies with subsequent goals and priorities have been identified for Lehigh County for the period of FY 2019 through FY 2023 for the Community Development Block Grant (CDBG) Program:

#### HOUSING STRATEGY - HSS

##### Goal:

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

##### Objectives:

- **HSS-1 Home Ownership** - Promote and assist in developing homeownership opportunities for low- and moderate-income persons & families.
- **HSS-2 Mixed Income Housing** - Promote and assist in the development of mixed income housing, both rental housing and housing for homebuyers.
- **HSS-3 Housing Rehabilitation** - Promote and assist in the preservation of existing owner and renter occupied housing stock in the County.
- **HSS-4 Housing Construction** - Promote and assist in the development of affordable housing, both rental and sales housing.
- **HSS-5 Revitalization** - Promote and assist in the stabilization of residential neighborhoods by removing slums and blight, assembling sites for new housing, rehabilitation of existing housing, and code enforcement.
- **HSS-6 Fair Housing** - Affirmatively further fair housing by promoting fair housing choice throughout Lehigh County.
- **HSS-7 Housing Support** - Promote and assist in housing counseling and support services to low- and moderate-income persons and families.

#### HOMELESS STRATEGY - HOM

##### Goal:

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

**Objectives:**

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

**SPECIAL NEEDS STRATEGY - SNS**

**Goal:**

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

**Objectives:**

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

**COMMUNITY DEVELOPMENT STRATEGY - CDS**

**Goal:**

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

**Objectives:**

- **CDS-1 Community Facilities** - Assist in improving parks, recreational centers, trails, libraries, and other public and community facilities throughout the County.
- **CDS-2 Infrastructure** - Assist in improving the public infrastructure through rehabilitation, reconstruction, and new construction.



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

### **ECONOMIC DEVELOPMENT STRATEGY - EDS**

#### **Goal:**

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

#### **Objectives:**

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

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

#### **Goal:**

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

#### **Objectives:**

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

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

**SP-10 Geographic Priorities – 91.215 (a)(1)****Geographic Area**

<b>1.</b>	<b>Area Name:</b>	County Wide
	<b>Area Type:</b>	Local Target area
	<b>Other Target Area Description:</b>	Low- and Moderate-Income Areas
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	28.23%
	<b>Revital Type:</b>	Comprehensive
	<b>Other Revital Description:</b>	

<p><b>Identify the neighborhood boundaries for this target area.</b></p>	<ul style="list-style-type: none"> <li>• C.T. 1900, B.G. 1</li> <li>• C.T. 5100, B.G. 3</li> <li>• C.T. 5100, B.G. 4</li> <li>• C.T. 5702, B.G. 2</li> <li>• C.T. 5702, B.G. 3</li> <li>• C.T. 5703, B.G. 3</li> <li>• C.T. 5704, B.G. 1</li> <li>• C.T. 5800, B.G. 1</li> <li>• C.T. 5901, B.G. 4</li> <li>• C.T. 5901, B.G. 5</li> <li>• C.T. 6001, B.G. 2</li> <li>• C.T. 6101, B.G. 1</li> <li>• C.T. 6800, B.G. 1</li> <li>• C.T. 6800, B.G. 4</li> </ul> <p>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:</p> <ul style="list-style-type: none"> <li>• C.T. 5100, B.G. 2</li> <li>• C.T. 5200, B.G. 3</li> <li>• C.T. 5601, B.G. 1</li> <li>• C.T. 5602, B.G. 4</li> <li>• C.T. 5702, B.G. 1</li> <li>• C.T. 5704, B.G. 2</li> <li>• C.T. 5800, B.G. 3</li> <li>• C.T. 5901, B.G. 3</li> <li>• C.T. 5902, B.G. 1</li> <li>• C.T. 6001, B.G. 3</li> <li>• C.T. 6001, B.G. 5</li> <li>• C.T. 6101, B.G. 3</li> <li>• C.T. 6202, B.G. 2</li> <li>• C.T. 6202, B.G. 3</li> <li>• C.T. 6303, B.G. 3</li> <li>• C.T. 6500, B.G. 2</li> <li>• C.T. 6500, B.G. 3</li> <li>• C.T. 6701, B.G. 2</li> <li>• C.T. 6702, B.G. 2</li> <li>• C.T. 6703, B.G. 3</li> <li>• C.T. 6902, B.G. 2</li> </ul>
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<b>Include specific housing and commercial characteristics of the area.</b>	Housing in the older areas require rehabilitation, both for renters and homeowners. Some of these block groups lie in the flood plain.
<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	HUD's Low-Mod Income data assisted in the identification of these areas. Consultations with local public officials and social services that served the area confirmed the Census Tracts and Block Groups with the highest need.
<b>Identify the needs in this target area.</b>	There is a need for new housing construction, housing rehabilitation, infrastructure improvements, improvements in parks and recreational facilities, social services to assist groups with special needs, and demolition to clear vacant, blighted properties.
<b>What are the opportunities for improvement in this target area?</b>	Many of the target areas have older housing stock that would be desirable if rehabilitated. The County is growing and there are multiple high-demand locations within the County that can be served with housing construction programs, housing rehabilitation programs, and infrastructure improvements.
<b>Are there barriers to improvement in this target area?</b>	Funding is limited for improvements in these areas and the County must decide where to prioritize the use of its funding.

**Table 47 - Geographic Priority Areas**

### General Allocation Priorities

**Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)**

Lehigh County has allocated its CDBG funds for FY 2019 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 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 2019 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)

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- 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)

**SP-25 Priority Needs - 91.215(a)(2)****Priority Needs****Table 4 – Priority Needs Summary**

<b>1</b>	<b>Priority Need Name</b>	<b>Housing Priority</b>
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly
	<b>Geographic Areas Affected</b>	County Wide
	<b>Associated Goals</b>	HSS-1 Home Ownership HSS-2 Mixed Income Housing HSS-3 Housing Rehabilitation HSS-4 Housing Construction HSS-5 Revitalization HSS-6 Fair Housing HSS-7 Housing Support
	<b>Description</b>	Improve, preserve, and expand the supply of affordable housing for low- and moderate-income persons and families in Lehigh County.



	<b>Basis for Relative Priority</b>	There is a need for affordable, accessible, decent housing in Lehigh County. There is a need to increase the quality of the housing stock in the County for renters, homeowners, and homebuyers.
2	<b>Priority Need Name</b>	<b>Homeless Priority</b>
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	<b>Geographic Areas Affected</b>	County Wide
	<b>Associated Goals</b>	HOM-1 Housing HOM-2 Operation/Support HOM-3 Homeless Prevention
	<b>Description</b>	Improve the living conditions and services for homeless persons and families in Lehigh County.
	<b>Basis for Relative Priority</b>	There is a need to assist the homeless by providing housing, counseling, and other services in Lehigh County.

3	<b>Priority Need Name</b>	<b>Other Special Needs Priority</b>
	<b>Priority Level</b>	Low
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	<b>Geographic Areas Affected</b>	County Wide
	<b>Associated Goals</b>	SNS-1 Housing SNS-2 Social Services SNS-3 Accessibility
	<b>Description</b>	Improve, preserve, and expand facilities for persons with special needs and the disabled in Lehigh County.
	<b>Basis for Relative Priority</b>	There is a need to assist persons with special needs by expanding facilities and services for individuals with disabilities, the elderly, and other persons who have special needs.
4	<b>Priority Need Name</b>	<b>Community Development Priority</b>
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Non-housing Community Development
	<b>Geographic Areas Affected</b>	County wide
	<b>Associated Goals</b>	CDS-1 Community Facilities CDS-2 Infrastructure CDS-3 Public Services CDS-4 Accessibility CDS-5 Public Safety CDS-6 Clearance CDS-7 Public Transit
	<b>Description</b>	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.
	<b>Basis for Relative Priority</b>	There is a need to improve public and community facilities, infrastructure, public transit, public services, public safety, and the quality of life in Lehigh County.
<b>5</b>	<b>Priority Need Name</b>	<b>Economic Development Priority</b>
	<b>Priority Level</b>	Low

	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Non-housing Community Development
	<b>Geographic Areas Affected</b>	County Wide
	<b>Associated Goals</b>	EDS-1 Employment EDS-2 Financial Assistance EDS-3 Revitalization EDS-4 Financial Incentives
	<b>Description</b>	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.
	<b>Basis for Relative Priority</b>	There is a need to increase employment, self-sufficiency, education, job training, technical assistance, and economic empowerment of the residents of Lehigh County.
	<b>6</b>	
	<b>Priority Need Name</b>	<b>Administration, Planning, and Management Priority</b>
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	<b>Geographic Areas Affected</b>	County Wide
	<b>Associated Goals</b>	APM-1 Coordination APM-2 Planning
	<b>Description</b>	Provide sound and professional planning, administration, oversight and management of Federal, state, and local funded programs.
	<b>Basis for Relative Priority</b>	There is a continuing need for planning, administration, management, and oversight of Federal, state, and local funded programs.

**Narrative (Optional)**

The priority ranking of needs for housing; homelessness; other special needs; community development; economic development; and administration, planning, and management are as follows:

- **High Priority** - Activities are assigned a high priority if the County expects to fund them during the Five Year Consolidated Plan period.
- **Low Priority** - Activities are assigned a low priority if the activity may not be funded by the County during the Five Year Consolidated Plan period. The County may support applications for other funding if those activities are consistent with the needs identified in the Five Year Consolidated Plan.

**SP-30 Influence of Market Conditions – 91.215 (b)****Influence of Market Conditions**

<b>Affordable Housing Type</b>	<b>Market Characteristics that will influence the use of funds available for housing type</b>
Tenant Based Rental Assistance (TBRA)	Lehigh County does not provide Tenant Based Rental Assistance.
TBRA for Non-Homeless Special Needs	Lehigh County does not provide Tenant Based Rental Assistance.
New Unit Production	There is a high priority for new housing units in Lehigh County. The County needs affordable, decent, safe, and sanitary housing.
Rehabilitation	There is a high demand in Lehigh County to provide rehabilitation assistance. The County needs affordable, accessible, decent, safe, and sanitary housing that could be accomplished through rehabilitation.
Acquisition, including preservation	The cost to acquire property is expensive, especially when relocation benefits are required. There are four (4) historic districts in the County outside of the Cities of Allentown and Bethlehem, located in Fountain Hill, Slatington, Catasauqua, and Coopersburg. There is also the George Taylor House Museum in the Borough of Catasauqua.

**Table 48 – Influence of Market Conditions**

**SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)****Introduction**

Lehigh County is receiving \$1,216,119 from CDBG funds. The program year goes from October 1<sup>st</sup> through September 30<sup>th</sup> of each year. These funds will be used to address the following priority needs:

- Housing
- Homeless
- Other Special Needs
- Community Development
- Economic Development
- Administration, Planning, and Management

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



**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				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	\$1,216,119.00	\$0.00	\$0.00	\$1,216,119.00	\$4,286,067.00	Five Years of funding at a reduction level each year of 5%.  16 projects/activities were funded based on FY 2019 CDBG allocations.

**Table 49 - Expected Resources – Priority Table****Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

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

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

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

- **Lehigh County Affordable Housing Trust Funds (AHTF)** - The Pennsylvania Optional County Affordable Housing Trust Funds Act of 1992 (Act 137), allows counties to raise revenues for affordable housing efforts by increasing the fees charged by the Recorder of Deeds Office for recording deeds and mortgages. The County raised the fee from \$13 to \$26 per document. Affordable Housing Trust Funds revenue is used to fund affordable housing initiatives and up to 15 percent may be used for the administrative costs to implement the initiatives. Eligible activities include using the revenues as the local matching funds to secure Federal and State Funds, construction or rehabilitation financing, housing-related services, match for other State or Federal funds, and supporting first-time homebuyer second mortgage programs. Lehigh County has recommended allocating \$574,736 for FY 2109 from the Affordable Housing Trust Fund to allow the funds to grow and be used for future projects.
- **HOME Investment Partnership** - Lehigh County will be receiving HOME funds from the Commonwealth of Pennsylvania's Department of Community and Economic Development. The County will receive \$500,000 in HOME funds in FY 2019.
- **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 2018, the Lehigh Valley received multi-year funding for thirteen (13) projects totaling \$2,466,453.00 for support services and permanent supportive housing projects throughout the region. Of the thirteen (13) projects funded, twelve (12) were Tier 1 awards, and one (1) was Tier 2 awards.
- **The Lehigh County Housing Authority** - Expects to receive \$506,299.00 in FY 2019 funds from the Public Housing Capital Fund Program, as well as Public Housing Operating funds and Section 8 Housing Choice Voucher assistance.
- **Emergency Solutions Grant (ESG) Funds** - Lehigh County will apply for ESG grants from the Pennsylvania Department of Community and Economic Development during FY 2019.
- Other federal funds that may be used in support of housing, community development, and economic development during FY 2019 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 any land, property, or buildings that are available for sale by using CDBG funds.

## Discussion

## SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Lehigh County	Government	Planning	Jurisdiction
Lehigh County Housing Authority	PHA	LIHTC Public Housing Rental	Region
Eastern PA Continuum of Care	Continuum of Care	Homelessness Non-homeless special needs Planning Public Services Rental	Region
Lehigh County Conference of Churches	Non-profit organization	Homelessness	Region

**Table 50 - Institutional Delivery Structure**

### Assess of Strengths and Gaps in the Institutional Delivery System

The following services are targeted to the homeless:

The Lehigh County Conference of Churches provides food for homeless people and families in conjunction with Catholic Charities. Both organizations also provide shelter for homeless people.

Valley Youth House serves unaccompanied youth in the Lehigh Valley. They offer shelter for youth up to the age of 18.

Turning Point of the LV provides shelter for domestic violence victims in Lehigh County. They provide Emergency Shelter and Rapid Rehousing services for victims and their families.

The YMCA and Salvation Army will provide emergency shelter during weather advisory days, particularly during the coldest weeks of the winter. The YMCA provides shelter for men and the Salvation Army provides shelter for women.

Lehigh Valley Health Network's Comprehensive Health Services provides free care for those infected with HIV/AIDS. Individuals with HIV/AIDS will not be allowed to seek treatment for addictions unless they are treated for HIV/AIDS first.

## Availability of services targeted to homeless persons and persons with HIV and mainstream services

Persons with HIV/AIDS and their families comprise a small percentage of the County's overall population, but that population is often more impoverished than the remainder of the County. Roughly 60% of those seeking help through Comprehensive Health Services of the Lehigh Valley are under 50% of the poverty line. Comprehensive Health Services assists over 1,000 people with HIV/AIDS, approximately 40 of whom have an active addiction. The Point in Time Count for Lehigh County in 2017 counted 2 persons with HIV/AIDS that were either sheltered or unsheltered homeless, 1 person in 2018 and 0 persons in 2019.

Comprehensive Health Services of the Lehigh Valley assists persons infected with HIV/AIDS. Many of their programs follow patients for multiple years. Though many of the persons they serve have previously had addictions, the majority of their patients do not have active addictions. Comprehensive Health Services will serve persons with active addictions who are also infected with HIV/AIDS before they are allowed to participate in recovery services. Many of these programs assist in the prevention of homelessness by providing wrap-around assistance to those at risk of becoming homeless.

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X		
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X		
Utilities Assistance	X		
<b>Street Outreach Services</b>			
Law Enforcement			
Mobile Clinics			
Other Street Outreach Services	X	X	
<b>Supportive Services</b>			
Alcohol & Drug Abuse	X	X	
Child Care	X		
Education	X		
Employment and Employment Training	X	X	
Healthcare	X		
HIV/AIDS	X		
Life Skills	X	X	
Mental Health Counseling	X		
Transportation	X		

**Table 51 - Homeless Prevention Services Summary**

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**Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)**

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**Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above**

Many of the homeless providers in Lehigh County cooperate and are capable of ensuring homeless persons and persons with special needs are able to find relevant services. This includes public entities. Valley Housing Development Corporation, which is Lehigh County Housing Authority's development entity, receives CoC funding for Supportive Housing Programs to provide housing for homeless individuals to make the transition from homelessness to permanent housing and self-sufficiency.

There is a need for a shelter that operates year-round at all hours of the day. However, this type of shelter is difficult to fund. There is also a need for a shelter for youths aged 18-24. This is a large homeless demographic in the Lehigh Valley Area, and the CoC has been aggressively conducting outreach to ensure that these youths are referred to relevant services. There is also a need for programs to treat opioid addictions, as they are severely lacking in Lehigh County. Public transit in the area has also been resistant to create referral-based bus routes for people with special needs.

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

Lehigh County has partnered with various County agencies, nonprofits, and service providers to carry out the services required by special needs populations. However, there are significant needs for mental health services and addiction counseling services in the region. There is also a need to provide public transit to bring special needs populations to the places where they can receive services. Lehigh County

will continue to partner with nonprofits that manage partnerships with these organizations and assist persons with special needs.

**SP-45 Goals Summary – 91.215(a)(4)****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	CDBG: \$0	Homeowner Housing Added: 0 Household Housing Unit
2	HSS-2 Mixed Income Housing	2019	2023	Affordable Housing	County Wide	Housing Priority	CDBG: \$0	Homeowner Housing Added: 0 Household Housing Unit
3	HSS-3 Housing Rehabilitation	2019	2023	Affordable Housing	County Wide	Housing Priority	CDBG: \$1,000,000	Homeowner Housing Rehabilitated: 15 Household Housing Unit
4	HSS-4 Housing Construction	2019	2023	Affordable Housing	County Wide	Housing Priority	CDBG: \$0	Rental units constructed: 0 Household Housing Unit  Homeowner Housing Added: 0 Household Housing Unit
5	HSS-5 Revitalization	2019	2023	Affordable Housing	County Wide	Housing Priority	CDBG: \$0	Other: 0 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	HSS-6 Fair Housing	2019	2023	Affordable Housing	County Wide	Housing Priority	CDBG: \$50,000	Public service activities for Low/Moderate Income Housing Benefit: 200 Households Assisted  Other: 5 Other
7	HSS-7 Housing Support	2019	2023	Affordable Housing	County Wide	Housing Priority	CDBG: \$0	Public service activities for Low/Moderate Income Housing Benefit: 0 Households Assisted
8	HOM-1 Housing	2019	2023	Homeless	County Wide	Homeless Priority	CDBG: \$148,500	Public service activities for Low/Moderate Income Housing Benefit: 150 Households Assisted
9	HOM-2 Operation/Support	2019	2023	Homeless	County Wide	Homeless Priority	CDBG: \$0	Overnight/Emergency Shelter/Transitional Housing Beds added: 0 Beds



Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
10	HOM-3 Homeless Prevention	2019	2023	Homeless	County Wide	Homeless Priority	CDBG: \$0	Homelessness Prevention: 0 Persons Assisted
11	SNS-1 Housing	2019	2023	Non-Homeless Special Needs	County Wide	Other Special Needs Priority	CDBG: \$0	Public service activities for Low/Moderate Income Housing Benefit: 0 Households Assisted  Rental units constructed: 0 Household Housing Unit  Homeowner Housing Added: 0 Household Housing Unit