
LEHIGH COUNTY, PENNSYLVANIA

DEPARTMENT OF COMMUNITY & ECONOMIC DEVELOPMENT

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

FY 2019-2023 Five Year Consolidated Plan – Substantial Amendment # 4

Amended: August 15, 2022

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

Frank Kane, Director
Department of Community and
Economic Development



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**Substantial Amendment # 4:**

The fourth amendment was submitted to HUD on August 15, 2022 to amend the Five Year Consolidated Plan to add the HOME Investment Partnership (HOME) program. Lehigh County has been notified by the U.S. Department of Housing and Urban Development (HUD) that it is eligible to receive HOME Investment Partnership (HOME) funds as a Federal entitlement community. To accept these funds the County needs to amend its FY 2019-2023 Five Year Consolidated Plan to add the HOME funds into this document.

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

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 Saturday, June 4, 2022 of the FY 2019 Annual Action Plan - Substantial Amendment # 3. The County accepted public comments until Tuesday, July 5, 2022. The County held a Public Hearing on the Substantial Amendment on Monday, June 20, 2022 at 11:00 AM. The public hearing was held in Room 519 of the Lehigh County Government Center, 17 South 7th Street, Allentown, PA 18101. The purpose of the Public Hearing was to present the Substantial Amendment to the residents for the CDBG-CV funds.

Substantial Amendment # 4:

Lehigh County ran a newspaper notice on Thursday, July 7, 2022 of the FY 2019-2023 Five Year Consolidated Plan - Substantial Amendment # 4. The County accepted public comments until Monday, August 8, 2022. The County held a Public Hearing on the Substantial Amendment on Tuesday, July 19, 2022 at 12:00 PM. The public hearing was held in Room 524 of the Lehigh County Government Center, 17 South 7th Street, Allentown, PA 18101. The purpose of the Public Hearing was to present the Substantial Amendment to the residents.

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.

Substantial Amendment # 4:

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.

Substantial Amendment # 4:

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 \$165,085 for a new budget amount of \$150,000.
- **Food Security Program** - increase the original budget amount of \$250,000 by \$550,000 for a new budget amount of \$800,000.
- **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** - increase original budget amount of \$750,000 by \$50,000 for a new budget amount of \$800,000.
- **COVID Support Program** - create a new program start-up with a budget of \$175,000.
- **Administration** - decrease the original budget amount of \$265,529 by \$164,759 for a new budget of \$100,770.
- **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 Saturday, June 4, 2022 of the FY 2019 Annual Action Plan - Substantial Amendment # 3. The County accepted public comments until Tuesday, July 5, 2022. The County held a Public Hearing on the Substantial Amendment on Monday, June 20, 2022 at 11:00 AM. The public hearing was held in Room 519 of the Lehigh County Government Center, 17 South 7th Street, Allentown, PA 18101.

The FY 2019 Action Plan – Substantial Amendment # 3 was re-submitted in IDIS to HUD on July 6, 2022 once the public comments period ended.

Substantial Amendment # 4:

Lehigh County ran a newspaper notice on Thursday, July 7, 2022 of the FY 2019-2023 Five Year Consolidated Plan - Substantial Amendment # 4. The County accepted public comments until Monday, August 8, 2022. The County held a Public Hearing on the Substantial Amendment on Tuesday, July 19, 2022 at 12:00 PM. The public hearing was held in Room 524 of the Lehigh County Government Center, 17 South 7th Street, Allentown, PA 18101.

The Substantial Amendment # 4 was re-submitted in IDIS to HUD on or before August 15, 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

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Lehigh County Department of Community & Economic Development submitted a funding request for the County-wide Housing Rehabilitation Program, and for Blighted Property Renovation. The County-wide Housing Rehabilitation Program and the Blighted Property Renovation projects were funded in FY 2019.
2	Agency/Group/Organization	Coplay Borough
	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 Other government - Local
	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.

3	Agency/Group/Organization	Slatington Borough
	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 Other government - Local
	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.

4	Agency/Group/Organization	Coopersburg Borough
	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 Other government - Local
	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.

5	Agency/Group/Organization	Alburtis Borough
	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 Other government - Local
	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.

6	Agency/Group/Organization	Salisbury Township
	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 Other government - Local
	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.

7	Agency/Group/Organization	Macungie Borough
	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 Other government - Local
	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.
8	Agency/Group/Organization	Lehigh County Housing Authority
	Agency/Group/Organization Type	Housing PHA Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs

	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.
9	Agency/Group/Organization	Workforce Board Lehigh Valley
	Agency/Group/Organization Type	Services-Employment Regional organization
	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.
10	Agency/Group/Organization	Lehigh Valley Economic Development Corporation
	Agency/Group/Organization Type	Regional organization Business Leaders Business and 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.
11	Agency/Group/Organization	Neighborhood Housing Services of the Lehigh Valley, Inc.
	Agency/Group/Organization Type	Housing Services - Housing
	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.
12	Agency/Group/Organization	LVHN Comprehensive Health Services
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS Health Agency Business Leaders Major Employer
	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.
13	Agency/Group/Organization	Lehigh Valley Planning Commission
	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 Regional organization Planning organization 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.
14	Agency/Group/Organization	Lehigh County Emergency Management Department

	Agency/Group/Organization Type	Other government - Local Regional organization Planning organization
	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 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.
	15 Agency/Group/Organization	VIA of the Lehigh Valley
15	Agency/Group/Organization Type	Services-Children Services-Persons with Disabilities Services-Health Services-Education
	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.

16	Agency/Group/Organization	North Penn Legal Services
	Agency/Group/Organization Type	Services - Housing Service-Fair Housing
	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.
17	Agency/Group/Organization	The Literacy Center
	Agency/Group/Organization Type	Services-Persons with Disabilities Services-Education Services-Employment
	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.

18	Agency/Group/Organization	Meals on Wheels of the Greater Lehigh Valley
	Agency/Group/Organization Type	Services-Elderly Persons Services-Health Health Agency
	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.
19	Agency/Group/Organization	Center for Vision Loss
	Agency/Group/Organization Type	Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-Health Health Agency
	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.
20	Agency/Group/Organization	Community Action Development Corporation of Allentown
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless Service-Fair Housing Regional organization Planning organization Neighborhood Organization
	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.
21	Agency/Group/Organization	Lehigh Conference of Churches
	Agency/Group/Organization Type	Housing Services-Children Services-Elderly Persons Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services - Victims

	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.
22	Agency/Group/Organization	Valley Youth House
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-homeless Service-Fair Housing Child Welfare Agency Publicly Funded Institution/System of Care
	What section of the Plan was addressed by Consultation?	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
	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.

23	Agency/Group/Organization	Community First Fund
	Agency/Group/Organization Type	Housing Services - Housing Services-Employment Community Development Financial Institution
	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.
24	Agency/Group/Organization	Catholic Charities Diocese of Allentown
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services - Victims Publicly Funded Institution/System of Care

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
25	Agency/Group/Organization	The Salvation Army
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Victims of Domestic Violence Services-homeless Services - Victims
	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.

26	Agency/Group/Organization	Lehigh Valley Center for Independent Living
	Agency/Group/Organization Type	Housing Services-Elderly Persons Services-Persons with Disabilities
	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.
27	Agency/Group/Organization	Turning Point of the LV, Inc.
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Victims of Domestic Violence Services - Victims Child Welfare Agency Publicly Funded Institution/System of Care
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; housing and community development priorities; social service and economic development needs.
28	Agency/Group/Organization	The ARC: Lehigh & Northampton Counties
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Health Services-Education Health Agency Child Welfare Agency
	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.
29	Agency/Group/Organization	Casa Guadalupe Center
	Agency/Group/Organization Type	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	BB&T
	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	Pennsylvania Eastern Continuum of Care Collaborative
	Agency/Group/Organization Type	Housing Services - Housing Publicly Funded Institution/System of Care Correctional Institutions

	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group meeting held, phone calls; homeless priorities; social service and economic development needs.
32	Agency/Group/Organization	USDA Rural Utilities
	Agency/Group/Organization Type	Broadband Service Provider
	What section of the Plan was addressed by Consultation?	Broadband Access Plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	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?
CoC Consolidated Application	Lehigh Valley Regional Homeless Advisory Board	They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans.
Annual and Five Year Capital Plans	Lehigh County Housing Authority	Lehigh County Housing Authority is the lead agency providing public housing assistance in Lehigh County. The goals of the County and the Housing Authority are complementary.
Lehigh County Emergency Management Plan	Lehigh County Emergency Management	They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans.
2017 Childhood Lead Surveillance Annual Report	PA Department of Health	They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans.
Pennsylvania Broadband Initiative	PA Department of Community and Economic Development	They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans.
Livable Landscapes – Lehigh County Open Space Plan	Lehigh Valley Planning Commission	They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans.
Analysis of Impediments to Fair Housing Choice	Lehigh County Department of Community and Economic Development	They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans.

Table 3 – Other local / regional / federal planning efforts

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.

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 Saturday, June 4, 2022 of the FY 2019 Annual Action Plan - Substantial Amendment # 3. The County accepted public comments until Tuesday, July 5, 2022. The County held a Public Hearing on the Substantial Amendment on Monday, June 20, 2022 at 11:00 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 July 6, 2022.

Substantial Amendment # 4:

Lehigh County ran a newspaper notice on Thursday, July 7, 2022 of the FY 2019-2023 Five Year Consolidated Plan - Substantial Amendment # 4. The County accepted public comments until Monday, August 8, 2022. The County held a Public Hearing on the Substantial Amendment on Tuesday, July 19, 2022 at 12:00 PM. The FY 2019-2023 Five Year Consolidated Plan – Substantial Amendment # 4 was submitted to the U.S. Department of Housing and Urban Development Philadelphia Office on or before August 15, 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.	https://www.surveymonkey.com/r/2019LehighCounty

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.	CARES Act Substantial Amendment # 3 - Newspaper Ad	<p>Minorities Persons with disabilities</p> <p>Non-targeted/ broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Agencies/ Organizations</p>	On Saturday, June 4, 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.	CARES Act Substantial Amendment # 3 - Public Meeting	<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 Monday, June 20, 2022 at 11:00 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.

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)
7.	Substantial Amendment # 4 - Newspaper Ad	Minorities Persons with disabilities Non-targeted/ broad community Residents of Public and Assisted Housing Agencies/ Organizations	On Thursday, July 7, 2022, Lehigh County published the Substantial Amendment Public Hearing Notice in the "Morning Call."	None.	None.	Not Applicable.

8.	Substantial Amendment # 4 - Public Meeting	<p>Minorities Persons with disabilities</p> <p>Non-targeted/ broad community</p> <p>Residents of Public and Assisted Housing Agencies/ Organizations</p>	<p>The Substantial Amendment # 4 Public Meeting was held on Tuesday, July 19, 2022 at 12:00 PM to discuss the Substantial Amendment # 4 for the County. The County received no public comments on the draft Substantial Amendment # 4.</p>	<p>Meeting minutes can be found in the appendix section of this Annual Action Plan – Substantial Amendment.</p>	None.	Not Applicable.
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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.