

---

# LEHIGH COUNTY, PENNSYLVANIA

DEPARTMENT OF COMMUNITY & ECONOMIC DEVELOPMENT

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

---

## **FY 2013 Consolidated Annual Performance Evaluation Report (CAPER)**

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

Frank Kane, Director  
Department of Community and  
Economic Development



## Table of Contents

A.	CR-00 Executive Summary .....	1
B.	CR-05 Goals and Outcomes – 91.520(a) .....	7
C.	CR-10 Racial and Ehtnic Composition of (person/households/families) Assisted .....	12
D.	CR-15 Resources and Investments – 91.520(a) .....	13
E.	CR-20 Affordable Housing – 91.520(b) .....	16
F.	CR-25 Homeless and Other Special Needs – 91.220(d, e); 91.320(d, e); 91.520(c).....	18
G.	CR-30 Public Housing – 91.220(h); 91.320(j) .....	21
H.	CR-35 Other Actions – 91.220(j)-(k); 91.3320(i)-(j) .....	23
I.	CR-40 Monitoring – 91.220(d, e); 91.520(c) .....	31
J.	CR-45 CDBG – 91.520(c).....	34
K.	CR-50 Section 3 Report .....	36
L.	CR-55 IDIS Reports .....	37
M.	CR-60 Fair Housing .....	38
N.	CR-65 Citizen Participation .....	39

## CR-00 - Executive Summary

In accordance with the Federal regulations found in 24 CFR Part 570, Lehigh County, Pennsylvania has prepared this Consolidated Annual Performance and Evaluation Report (CAPER) for the period of October 1, 2013 to September 30, 2014. This is Lehigh County's 7<sup>th</sup> CDBG program year as a federal entitlement community. Lehigh County became a federal entitlement community receiving Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development (HUD) in 2007. The first Five Year Consolidated Plan was prepared for the program years FY 2007 through FY 2011. The second Consolidated Plan is for the current period of FY 2012 through FY 2016. This second Consolidated Plan sets the priorities for the use of CDBG funding. The Consolidated Plan allows a community to take a comprehensive approach to use resources granted to the community by HUD. Yearly, Lehigh County submits an Annual Action Plan containing the proposed activities outlining the use of CDBG funds for the upcoming program year. The Annual Action Plan relates the activities to goals and objectives outlined in the Five Year Consolidated Plan. This Consolidated Annual Performance and Evaluation Report (CAPER) describes the accomplishments for the second year under the FY 2012 – 2016 Five Year Consolidated Plan. The CAPER describes the activities undertaken during this time period for funding from the U.S. Department of Housing and Urban Development (HUD) under the CDBG Program. The projects/activities and accomplishments described in this CAPER principally benefit low- and moderate-income persons and the funding has been targeted to neighborhoods where there is the highest percentage of low- and moderate-income residents in Lehigh County.

The FY 2013 “draft CAPER” was made available for public review and comment for a 15-day period beginning Monday, December 15, 2014 and ending on Monday, December 29, 2014. The availability for review of the “draft CAPER” was advertised in the local newspaper and the CAPER was on display at the following locations in the County and on the County's website (<http://www.lehighcounty.org/>):

- **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 following is the overall program narrative based on the Five Year Consolidated Plan and FY 2013 Annual Action Plan.

**Grants Received –**

Lehigh County has received the following grant amounts during the time period of October 1, 2013 through September 30, 2014:

	<b>CDBG</b>	<b>TOTALS</b>
Entitlement Grants	\$ 1,151,731.00	\$ 1,151,731.00
Program Income	\$ 0.00	\$ 0.00
<b>Total Funds Received</b>	<b>\$ 1,151,731.00</b>	<b>\$ 1,151,731.00</b>

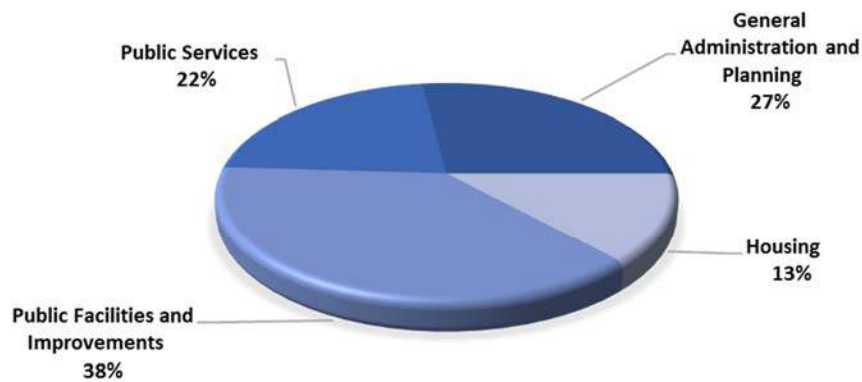
This chart only includes grants received during October 1, 2013 through September 30, 2014. Any previous year’s grants are not included.

**Funds Expended –**

Amounts shown in this table are funds that were expended during the time period of October 1, 2013 through September 30, 2014. These expenditures consist of previous year’s funds that were not used or expended during this time period and also any reprogrammed funds from previous years.

<b>Funding Sources</b>	<b>Total Funds Expended</b>
Community Development Block Grant (CDBG)	\$ 546,300.40
<b>Total</b>	<b>\$ 546,300.40</b>

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



Type of Activity	Expenditure	Percentage
Housing	\$ 71,801.50	13.14%
Public Facilities and Improvements	\$ 206,586.50	37.82%
Public Services	\$ 120,119.34	21.99%
General Administration and Planning	\$ 147,793.06	27.05%
<b>Total:</b>	<b>\$ 546,300.40</b>	<b>100.00%</b>

**Regulatory Caps and Set-Asides –**

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

	CDBG
FY 2013 Entitlement Grants	\$ 1,151,731.00
FY 2013 Program Income	\$ 0.00
Administrative Cap Allowance	20%
Maximum Allowable Expenditures	\$ 230,346.20
Administrative Disbursed in IDIS	\$ 147,793.06
Adjustment to Compute Total Administrative Obligations	\$ 230,346.00
<b>Administrative Percentage</b>	<b>20.00%</b>

Lehigh County’s CDBG Program administrative expenditures for this reporting period were \$230,346.00, which is at the 20% cap on administrative expenditures.

**CDBG Public Service Activity Cap –**

	CDBG
FY 2013 Entitlement Grants	\$ 1,151,731.00
Prior Year Program Income	\$ 0.00
Public Service Cap Allowance	15%
Maximum Allowable Expenditures	\$ 172,759.65

Total Public Services Funds Actually Expended	\$ 120,119.34
Total Public Services Obligations	\$ 126,000.00
<b>Public Service Percentage</b>	<b>10.94%</b>

Lehigh County obligated \$126,000.00 in funds for public services, which was 10.94% of the allowable expenditures and under the 15% cap on expenditures for public services.

### **Performance Measurements –**

During the FY 2013 CAPER period, the County addressed the following priority need categories identified in its Five Year Consolidated Plan:

#### **GOAL: HOUSING - H**

##### **H-1: Retain Existing Housing Stock**

The County met this goal by:

- Nine (9) owner-occupied housing units are being rehabilitated. No rehabilitations were completed during this CAPER period.
- The County funded an activity to assist 21 rental units through rehabilitation of the building's fire escape. Project is receiving bids for the work, but construction has not begun.

##### **H-2: Development of Affordable Housing**

The County met this goal by:

- Funded Community Action Committee of Lehigh Valley which is in the process of purchasing one (1) or two (2) homes in the Borough of Catasauqua. The Community Action Committee of Lehigh Valley has yet found a house or houses to purchase during this CAPER period.

##### **H-3: Homebuyer's Assistance**

The County met this goal by:

- During this CAPER period, the County allocated \$180,000.00 of the AHTF to support affordable housing projects.

**GOAL: HOMELESS - HA****HA-1: Homelessness Prevention**

The County met this goal by:

- Funded Catholic Charities which assisted 58 households to prevent homelessness.

**HA-2: Services**

The County met this goal by:

- Funded the Lehigh County Conference of Churches – COMPASS/SOAR Benefits Counseling which assisted 28 homeless persons.
- Funded Meals on Wheels of Lehigh County which assisted 84 low-income elderly during this CAPER period.

**HA-3: Shelter and Transitional Housing**

The County met this goal by:

- Lehigh County did not fund any projects/activities during this CAPER period.

**HA-4: Permanent Housing**

The County met this goal by:

- Lehigh County supported the Northeast Pennsylvania Continuum of Care Network with its FY 2013 CoC Application.

**HA-5: Non-Homeless Special Needs**

The County met this goal by:

- Lehigh County did not fund any projects/activities during this CAPER period.

**GOAL: NON-HOUSING COMMUNITY DEVELOPMENT - CD**

Community Development Block Grant (CDBG) funds will be directed to local municipalities to address the quality of life in low-income areas through infrastructure and public facility improvements.

**CD-1: Public Facilities and Infrastructure**

The County met this goal by:

- Funded the following activities: Borough of Coopersburg - Sanitary Sewer Rehabilitation, Borough of Emmaus - Curb Cuts, Lower Macungie - Curb Cuts, Borough of Macungie - Curb Cuts, and Borough of Slatington - Street Reconstruction and Curb Cuts. These projects/activities are not yet completed. Borough of Fountain Hill - Cherokee Street Reconstruction and Curb Cuts project was completed during this CAPER period.

**CD-2: Economic Development**

The County met this goal by:

- Funded Lehigh Carbon Community College - Commercial Motor Vehicle Training for Low-Income County Residents. Four (4) low-income residents completed the program.

**CD-3: Public Services**

The County met this goal by:

Assisted human service organizations with funds to provide essential services to at-risk populations.

- Homeless prevention services (86 persons)
- Housing referral and counseling (90 persons)
- Subsistence services (142 persons)
- Fair Housing outreach, education and advocacy (70 persons)
- Employment Training (4 persons)
- Career Counseling (23 persons)



## CR-05 - Goals and Outcomes

**Progress the jurisdiction has made in carrying out its strategic plan and its action plan.**

### **91.520(a)**

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

This is Lehigh County's second year of the FY 2012-2016 Five-Year Consolidated Plan designed to address the housing and non-housing needs of County residents. This year's CAPER reports on the actions and achievements the County accomplished in Fiscal Year 2013.

The CAPER for the FY 2013 Annual Action Plan for Lehigh County encompasses the County's CDBG Program and outlines which activities the County undertook during the program year beginning October 1, 2013 and ending September 30, 2014. The Lehigh County Department of Community and Economic Development is the lead entity and administrator for the CDBG funds.

The CDBG Program and the activities outlined in this FY 2013 CAPER principally benefited low- and moderate-income persons and funding was targeted to neighborhoods where there is the highest percentage of low- and moderate-income residents.

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

- **Housing Goal – H** – Budget \$--231,385.00, expended \$0.00.
- **Homeless Goal – HA** – Budget \$72,116.14, expended \$61,269.34.
- **Non-Housing Community Development Goal – CD** – Budgeted \$622,850.00, expended \$202,470.36.

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

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

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
CD-1 Public Facilities and Infrastructure	Non-Housing Community Development	CDBG: \$564,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	26	8,001	30,773.08%	3,409	8,001	234.70%
CD-1 Public Facilities and Infrastructure	Non-Housing Community Development	CDBG: \$564,000	Buildings Demolished	Buildings	2	0	0.00%	-	0	-
CD-1 Public Facilities and Infrastructure	Non-Housing Community Development	CDBG: \$564,000	Other	Other	-	0	-	1	0	0.00%
CD-2 Economic Development	Non-Housing Community Development	CDBG: \$6,800	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	-	0	-	15	0	0.00%
CD-2 Economic Development	Non-Housing Community Development	CDBG: \$6,800	Facade treatment/business building rehabilitation	Business	1	0	0.00%	-	0	-
CD-2 Economic Development	Non-Housing Community Development	CDBG: \$6,800	Businesses assisted	Businesses Assisted	2	0	0.00%	-	0	-
CD-3 Public Services	Non-Housing Community Development	CDBG: \$126,000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	-	241	-	202	241	119.31%

CD-3 Public Services	Non-Housing Community Development	CDBG: \$126,000	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	-	0	-	25	0	0.00%
CD-3 Public Services	Non-Housing Community Development	CDBG: \$126,000	Homelessness Prevention	Persons Assisted	-	57	-	-	57	-
CD-3 Public Services	Non-Housing Community Development	CDBG: \$126,000	Other	Other	15	0	0.00%	-	0	-
H-1 Retain Existing Housing Stock	Affordable Housing	CDBG: \$186,385	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	150	0	0.00%	25	0	0.00%
H-1 Retain Existing Housing Stock	Affordable Housing	CDBG: \$186,385	Rental units rehabilitated	Household Housing Unit	150	0	0.00%	-	0	-
H-1 Retain Existing Housing Stock	Affordable Housing	CDBG: \$186,385	Homeowner Housing Rehabilitated	Household Housing Unit	50	0	0.00%	-	0	-
H-2 Development of Affordable Housing	Affordable Housing	CDBG: \$45,000	Rental units constructed	Household Housing Unit	150	0	0.00%	-	0	-
H-2 Development of Affordable Housing	Affordable Housing	CDBG: \$45,000	Homeowner Housing Added	Household Housing Unit	10	0	0.00%	1	0	0.00%
H-3 Homebuyer's Assistance	Affordable Housing	CDBG: \$0	Direct Financial Assistance to Homebuyers	Households Assisted	20	0	0.00%	-	0	-
HA-1 Homeless Prevention	Homeless	CDBG: \$29,700	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	-	0	-	25	0	0.00%

HA-1 Homeless Prevention	Homeless	CDBG: \$29,700	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	50	0	0.00%	-	0	-
HA-2 Services	Homeless	CDBG: \$42,416.14	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	-	0	-	97	0	0.00%
HA-2 Services	Homeless	CDBG: \$42,416.14	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	250	0	0.00%	-	0	-
HA-3 Shelter and Transitional Housing	Homeless	CDBG: \$0	-	-	-	-	-	-	-	-
HA-4 Permanent Housing	Affordable Housing Homeless	CDBG: \$0	Housing for Homeless added	Household Housing Unit	34	0	0.00%	-	0	-
HA-5 Non- Homeless Special Needs	Affordable Housing Non-Homeless Special Needs	CDBG: \$0	Rental units constructed	Household Housing Unit	15	0	0.00%	-	0	-

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

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

During the FY 2013 CDBG Program Year, Lehigh County addressed the following goals from the Five Year Consolidated Plan:

**GOAL HOUSING – H:**

- H1: Retain Existing Housing Stock
- H2: Development of Affordable Housing
- H3: Homebuyer's Assistance

**GOAL HOMELESS – HA:**

- HA-1: Homelessness Prevention
- HA-2: Services
- HA-3: Shelter and Transitional Housing
- HA-4: Permanent Housing

**GOAL NON-HOUSING COMMUNITY DEVELOPMENT – CD:**

- CD-1: Public Facilities and Infrastructure
- CD-2: Economic Development
- CD-3: Public Services

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

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

91.520(a)

	<b>CDBG</b>
White	1,936
Black or African American	26
Asian	25
American Indian or American Native	9
Native Hawaiian or Other Pacific Islander	0
Hispanic	67
Not Hispanic	1,929
<b>Total</b>	<b>1,996</b>

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

**Narrative**

Lehigh County's programs benefitted 1,936 (96.99%) White families, 26 (1.30%) Black or African American families, and 34 (1.70%) Other Minorities families. Also, 67 families (3.36%) were Hispanic, versus 1,929 families (96.64%) who were not Hispanic.

**CR-15 - Resources and Investments 91.520(a)**

**Identify the resources made available**

Source of Funds	Source	Expected Amount Available	Actual Amount Expended Program Year X
CDBG	HUD	\$0.00	\$546,300.40

**Table 3 - Resources Made Available**

**Narrative**

Lehigh County received the following grant amounts during the time period of October 1, 2013 through September 30, 2014:

- CDBG Allocation - \$1,151,731.00
- CDBG Program Income - \$0.00

**Total Funds Received - \$1,151,731.00**

Under the FY 2013 Program Year, Lehigh County received the above amounts of Federal Entitlement Grants. These funds were made available to the County after October 23, 2013 when Mr. Nadab O. Bynum, Director of the Office of Community Planning and Development, HUD Philadelphia Office signed the FY 2013 CDBG Grant Agreement.

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

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
N/A	N/A	N/A	N/A

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

**Narrative**

Each year, Lehigh County selects projects, activities, and programs it will fund with its CDBG Grant. Rationale for funding activities are based on the following: the eligibility of the activity; the activity must meet a national objective; and the County or the agency/organization must show evidence of the need in the community. Additional consideration is given based on: the community’s or the agency/organization’s past history of expenditure of the CDBG funds; the ability to leverage other funds for this activity; and whether the FY 2013 request was related to projects that if not funded, would result in a special assessment against low-income residents. Finally, a high priority was given to activities based on the community’s or agency/organization’s ability to complete the project in a timely manner. Lehigh County will provide CDBG funds to activities principally benefitting low/mod income persons in the

participating jurisdictions of the Urban County. Such assistance is not directed to any specific geographic area, but based on income benefit.

Lehigh County did not anticipate any obstacles in the performance of the FY 2013 CDBG activities. Affordable housing was identified as the largest underserved need in Lehigh County in the Five Year Consolidated Plan. Lehigh County is not a HUD entitlement jurisdiction under the HOME program. Therefore, resources for housing activities are limited. The primary obstacle to meeting the underserved needs is the limited resources available to address the identified priorities in the County. Lehigh County will continue to partner with other agencies when feasible to leverage resources and maximize outcomes in housing and community development needs.



**Leveraging**

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

The following public (non-federal) and private financial resources were made available to Lehigh County and its agencies and organizations to address the needs identified in the FY 2013 Annual Action Plan:

- Lehigh County received \$500,000 of PA DCED HOME funds to expand the housing rehabilitation program.
- The County received \$207,500.00 of PA DCED ESG funds for the renovations at the Sixth Street Shelter in Allentown to improve facilities for the homeless.
- Affordable Housing Trust Funds have been created by Lehigh County from document recording fees to be used for affordable housing projects. During this CAPER period, the County allocated \$180,000.00 of the AHTF to support affordable housing projects.
- Lehigh County Housing Authority received \$255,492.00 in Capital Funds for the renovations and improvements to public housing to support affordable housing in the County.

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

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

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

	<b>One-Year Goal</b>	<b>Actual</b>
Number of homeless households to be provided affordable housing units	0	0
Number of non-homeless households to be provided affordable housing units	51	58
Number of special-needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>51</b>	<b>58</b>

**Table 5 – Number of Households**

	<b>One-Year Goal</b>	<b>Actual</b>
Number of households supported through rental assistance	25	58
Number of households supported through the production of new units	0	0
Number of households supported through the rehab of existing units	26	0
Number of households supported through the acquisition of existing units	0	0
<b>Total</b>	<b>51</b>	<b>58</b>

**Table 6 – Number of Households Supported**

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

During this CAPER period, Lehigh County supported 58 households through rental assistance, which was over the proposed 25 households. Lehigh County funded Countywide Housing Rehabilitation Program, but during this CAPER period, none of the housing units were completed. The County proposed to rehabilitate 26 housing units.

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

Lehigh County is working toward achieving its goal of providing decent, safe, sound, and affordable housing for its low- and moderate-income residents. The County is providing CDBG funds for self-

sufficiency and owner-occupied housing rehabilitation to keep the housing stock decent, safe, sound, and affordable.

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

Number of Persons Served	CDBG Actual
Extremely Low-income	1,993
Low-income	85
Moderate-income	30
<b>Total</b>	<b>2,108</b>

**Table 7 – Number of Persons Served**

**Narrative Information**

During this CAPER period, Lehigh County used its CDBG funds to assist 2,108 persons, of which 94.54% were Extremely Low-Income, 4.03% were Low-Income, and 1.42% were Moderate-Income.

Lehigh County provided CDBG and State HOME funds to develop or rehabilitate housing in the County. None of these projects/activities were completed during this CAPER period.

The County had the following During the FY 2013 CAPER period:

**H-1: Retain Existing Housing Stock**

- Nine (9) owner-occupied housing units are being rehabilitated. No rehabilitations were completed during this CAPER period.
- The County funded an activity to assist 21 rental units through rehabilitation of the building’s fire escape. Project is receiving bids for the work, but construction has not begun.

**H-2: Development of Affordable Housing**

- Funded Community Action Committee of Lehigh Valley which is in the process of purchasing one (1) or two (2) homes in the Borough of Catasauqua. The Community Action Committee of Lehigh Valley has yet found a house or houses to purchase during this CAPER period.

**H-3: Homebuyer’s Assistance**

- During this CAPER period, the County allocated \$180,000.00 of the AHTF to support affordable housing projects.

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

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

During this CAPER period Lehigh County applied for and received a PA DCED Emergency Solutions Grant (ESG) in the amount of \$207,500. The \$207,500 in ESG funds was for the renovations of the Sixth Street Shelter in Allentown and for funds for Lehigh County to administrate the project.

In addition, during this CAPER period the County applied for PA DCED FY 2014 ESG funds.

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

The Northeast Pennsylvania Regional Continuum of Care completes a regular "Point In Time Survey" each January to determine the number of homeless individuals and families in the Northeast Pennsylvania Region. Based on the "Point In Time Survey" conducted during January 2014, the following numbers of homeless persons were reported:

- **Unsheltered** - 128 individuals, 9 families with children, and 0 children only
- **Transitional Housing** - 100 individuals, 288 families with children, and 0 children only
- **Emergency Shelter** - 218 individuals, 164 families with children, and 2 children only

The shelter and transitional housing in Lehigh County include:

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

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

Finding availability and affordable units are a major challenge most households face in their efforts to move from a shelter or transitional housing, to permanent housing. Housing supply is limited and is often priced higher than the household can afford. The supply of affordable units may not be safe or meet the minimum housing code standards. The Lehigh County continues to encourage the development of affordable housing. The NE-RHAB encourages the shelters and the transitional housing providers to access the listing of affordable units on Pennsylvania Housing Finance Agency's (PHFA) housing locator website. The NE-RHAB is going to start to track the length of time households remain homeless and work to reduce that amount of time. The NE-RHAB hopes to partner with housing authorities in the region to give preference to homeless families. They also plan to address employment and training opportunities to increase the income of homeless individuals and households before they leave the shelters or transitional housing.

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

The NE-RHAB is participating with other state CoCs through the PA Homeless Steering Committee to develop partnerships with state agencies that operate programs that discharge individuals to homelessness. Progress has been made with several agencies. Discharge planning by youth type agencies includes steps to prepare youth for discharge from foster care and penal institutions. Mental health discharge is coordinated with the County Office of Mental Health. The departments of Corrections and Public Welfare are working to implement a new protocol to ensure that those leaving penal institutions are enrolled in Medical Assistance through the Pennsylvania COMPASS Program. This process will tie into food stamps and cash assistance. Providing housing and supportive services to those discharged from health care facilities is more difficult due to the special needs and short time frame involved. The PA Homeless Steering Committee is working with the Department of Health's Division of Acute and Ambulatory Care to research and establish protocols.

Coordination of services and local advocacy ensures that families that are already enrolled in one system of care are properly referred to other agencies providing appropriate services. The implementation of the

2-1-1 system will help expand the degree of coordination.

Lehigh County used FY 2013 CDBG funds to fund Catholic Charities - Self-Sufficiency & Intervention Program in the budget amount of \$29,700, and assisted fifty-eight (58) households. This program provides counseling, short-term rent, and utility payments that prevent homelessness. Lehigh County, through its various human services programs, provides support to all the categories of non-homeless special needs populations.

The Lehigh County Department of Human Services provides a wide range of programs for its elderly, substance abusers, people with mental health and intellectual disabilities, children and youth and veterans. During this program year the County did not use CDBG funds to meet these needs. The County is addressing these needs to the best extent possible using County and State grant funds.

**CR-30 - Public Housing 91.220(h); 91.320(j)****Actions taken to address the needs of public housing**

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

Each year, LCHA receives an allocation of funds from HUD under the Capital Fund Program to undertake physical improvements. In addition, the LCHA receives operating subsidies to offset the operating deficits associated with public housing units and to carry out maintenance. The Lehigh County Housing Authority received \$255,492.00 under a HUD Capital Fund grant for FY 2013. The FY 2013 allocation was used for the following activities:

- **Operations** - \$25,549.00
- **Administration** - \$25,549.00
- **Fees and Costs** - \$25,000.00
- **Dwelling Structures** - \$170,000.00
- **Contingency** - \$9,394.00

**Total = \$255,492.00**

The Lehigh County Housing Authority (LCHA) maintains 289 units of public housing and has a 100% occupancy rate. The public housing authority unit waiting list for 2-bedrooms and 3-bedrooms is closed, and has been closed since 2011. The waiting list for 225 senior units remains open. LCHA has 1,230 Section 8 Housing Choice Vouchers, with approximately 300 individual households on the waiting list as of June 2014. The Section 8 Housing Choice waiting list has been closed since 2010.

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

Lehigh County supports the Housing Authority's efforts to work with tenants of public housing and Section 8 Housing Choice Vouchers to achieve self-sufficiency. There are no joint projects planned for the 2013 program year.

Family Self-Sufficiency (FSS) programs are provided to Section 8 Housing Choice Voucher holders and public housing tenants. FSS program residents work with a case manager to develop goals that will, over a five (5) year period, lead to self-sufficiency. These goals may include education, specialized training, job readiness, job placement activities, and career advancement objectives. The goals for each participating family member are laid out in Individual Training and Services Plans. There are 50 families participating, and all are Section 8 voucher holders. In addition, there is a Family Savings Account program which is available to residents who participate in FSS. This program enables families to save funds to help with larger purchases, such as education or homeownership.

Lehigh County Housing Authority has residents of its public housing communities which serve as representatives to review the LCHA Annual Action Plan. The LCHA senior citizen developments in both Emmaus and Slatington have active resident advisory boards that focus on social programs in these communities.

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

The Lehigh County Housing Authority is not designated as “troubled” by HUD and is performing satisfactorily according to HUD guidelines and standards. Therefore, no assistance needed to improve operations of this Public Housing Authority.



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

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

North Penn Legal Services (NPLS) is a sub-recipient of FY 2013 CDBG funds from Lehigh County. NPLS is funded as a public service activity and provides legal aid related to affordable housing. NPLS serves low- and moderate-income residents living in Lehigh County outside of Allentown and Bethlehem. NPLS staff provides assistance to residents who face eviction, are denied housing, or are forced to live in uninhabitable conditions. This activity is conducted through workshops held at local social service agencies and in mobile home parks. Information on foreclosures, consumer issues, and fair housing is also provided to the residents of Lehigh County.

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

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

Lehigh Valley Center for Independent Living (LVCIL) receives CDBG funds to carry out public service activities. The FY 2013 CDBG funds were used to provide housing location assistance to persons with disabilities. Services included case management, housing search, placement, and specialized support services.

The Lehigh Valley Economic Development Corporation (LVEDC) received an award of \$2.3 million as a Sustainable Communities Regional Planning Grant from HUD. Eleven (11) agencies came together to apply for this grant. These agencies formed the Lehigh Valley Sustainability Consortium (LVSC).

LVSC hired an independent consulting firm to complete the Regional Analysis of Impediments to Fair Housing Choice. The RAI was submitted to HUD on October 30, 2014. LVSC is waiting for HUD's approval.

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

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

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

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

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

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

Lead-based paint poses a particular hazard to children under the age of six, and is the focus of efforts by the U.S. Department of Housing and Urban Development (HUD) to raise awareness of the problem and

mitigate or eliminate the hazard. Lead-based paint was banned in 1978, but housing constructed prior to that time typically contains lead-based paint to some degree. Lead hazards are addressed during housing rehabilitation efforts. All homes that receive rehabilitation assistance are tested for the presence of lead-based paint. When evidence is found, the paint surfaces are removed or the material is encapsulated to prevent exposure.

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

During this CAPER period, two (2) housing units were abated for lead based paint hazards with CDBG funds.

### **Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)**

Approximately 12.9% of Lehigh County's residents live in poverty, which is less than the Commonwealth of Pennsylvania where 13.1% of residents live in poverty. Female-headed households with children are particularly affected by poverty at 40.4%. This information is taken from the U.S. Census "2008-2012 ACS Five-Year Estimates." The County's goal is to reduce the extent of poverty by actions the County can control, and through work with other agencies/organizations.

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

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

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

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

- The Lehigh County Department of Community and Economic Development (DCED) works with the Lehigh Valley Chamber of Commerce through the Borough Business Revitalization Program (BBRP) to provide economic development services to the Lehigh Valley's small towns. The BBRP mobilizes volunteers and partners in the public and private sectors to target investment and development into Lehigh Valley's smaller urban cores and central business districts.
- Lehigh County works in conjunction with the Lehigh Valley Economic Development Corporation (LVEDC), community organizations, other economic development groups and the Workforce Investment Board to help enhance programs and create opportunities in the County.
- Lehigh County Economic Development Corporation (LVEDC) is able to provide manufacturing, industrial, and nonprofit organizations with low interest financing generated through tax exempt revenue bonds.
- Lehigh County CareerLink offers job search counseling, skills assessment programs, GED courses, information on training programs and workshops on many subjects, including resume writing and interview skills. Considered a one-stop location for all employment needs, CareerLink offers a multi-faceted approach to the job market.

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

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

In order to address the County's housing and community development needs, the County has established an extensive public private partnership aimed at revitalization in the County. In 2013, the partnership included the following agencies:

- North Penn Legal Services
- Catholic Charities, Diocese of Allentown
- Carbon Lehigh Intermediate Unit 21
- CIS Career Services At Whitehall High School
- Lehigh County Conference of Churches
- Lehigh Carbon Community College
- Meals on Wheels of Lehigh County, Inc.

- Lehigh Valley Center for Independent Living (LVCIL)
- New Bethany Ministries
- Northeast Regional Housing Advisory Board (NE RHAB)
- Lehigh Valley Community Land Trust (LVCLT)

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

- The Greater Lehigh Valley Chamber of Commerce
- Community Action Committee of Lehigh Valley
- Local elected officials, through its Congress of Government (COG) members

The Department of Community and Economic Development has been working closely with CACLV and the Lehigh Valley Community Land Trust (LVCLT). The LVCLT plays a major role in the implementation of the NSP I Program.

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

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

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

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

The primary responsibility for the administration of the Annual Action Plan is assigned to Lehigh County Department of Community and Economic Development. This agency will coordinate activities among local municipalities, public entities, and private organizations, in their efforts to implement different elements and to realize the prioritized goals of the Annual Action Plan. The County is committed to continuing its participation and coordination with public, housing, and social service organizations. The County solicits applications for CDBG funds. In addition, the County sends out applications to a list of agencies,

organizations, housing providers, and local municipalities that have previously submitted an application, or have expressed an interest in submitting an application. The applications are reviewed by the Department of Community and Economic Development staff. The staff discusses any questions with the applicant.

Lehigh County has continued its efforts to enhance coordination between agencies by creating partnerships such as the implementation of the Section 3 and MBE/WBE outreach initiatives. The Section 3 outreach effort partners with the CareerLink, the Lehigh County Housing Authority and CACLV to identify Section 3 individuals and businesses and to provide feedback on available job opportunities. Such partnerships help to develop a better understanding of community needs.

The Affordable Housing Task Force is a regional group that includes Lehigh County. This group is developing the tools for and interest of the local municipalities for inclusionary zoning, cottage housing development, density bonuses, and transit oriented development. The Lehigh Valley was awarded a Sustainable Communities Regional Planning Grant from HUD. Through this effort, the Five Year Strategic Plan and the larger regional plan is being prepared. As described in *Prosper Lehigh Valley*, a blog on economic development in the Lehigh Valley, eleven agencies came together to apply for this grant through the U.S. Department of Housing and Urban Development (HUD). This grant was one of a few programs that are made possible through the Federal Office of Sustainable Communities, a historic collaboration among HUD, U.S. Department of Transportation, and the U.S. Environmental Protection Agency. Locally, the 11 partners applied through the Lehigh Valley Economic Development Corporation as the Lehigh Valley Sustainability Consortium (LVSC).

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

During this CAPER period, Lehigh County took the following actions to overcome the effects of the impediments identified in the Analysis of Impediments to Fair Housing Choice:

- **Impediment #1 – Increase and Enhance Fair Housing Education and Outreach** - Lehigh County has been participating in the Regional Analysis of Impediments through a Sustainability Grant with Lehigh Valley Economic Development Corporation. During this CAPER period, North Penn Legal Services received CDBG funding to continue its fair housing outreach and education. They held the following Quarterly Meetings to discuss Fair Housing Issues with its funders: September 8, 2014; June 9, 2014; March 14, 2014; and December 9, 2014. In addition, a show entitled the “Focus Show” was taped on May 8, 2014 at PBS 39. This show featured members from Lehigh Valley Association of Realtors (LVAR) and Community Action Committee of the Lehigh Valley, Inc. (CACLV). The Show aired on May 9, 2014.
- **Impediment #2 – Continue Support of Affordable Housing Programs** – The County continued to support affordable housing through the use of the County’s Affordable Housing Trust Fund dollars. In addition, the County used CDBG funds to assist the Community Action Committee of

Lehigh Valley with funds for the Community Land Trust Housing Acquisition.

Attached at the end of the CAPER in the Fair Housing Section are the following items:

- Flyers from the Lehigh Fair Housing Summit
- Lehigh Valley Fair Housing Summit Survey Results
- Lehigh Valley Association of REALTORS Press Release
- The new RAI Impediments for Lehigh County
- The new RAI Impediments for Lehigh County

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

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

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

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

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

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

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

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

There are monitoring responsibilities that go beyond the time of completion of various activities. The overall performance of the program relative to the Five Year Strategic Plan goals is monitored at least bi-annually through the selection of the annual activities and again during the preparation of the



Comprehensive Annual Performance and Evaluation Report (CAPER). If it appears that proposed goals are not being addressed, the County will re-evaluate the goals, project performance and determine the course of action needed to bring the program into compliance.

During this CAPER period, the County Department of Community and Economic Development (DCED) staff did the following monitoring's:

- **Lehigh Carbon Community College** - September 8, 2014
- **Meals on Wheels** - September 12, 2014
- **North Penn Legal Services** - September 19, 2014
- **Lehigh County Conference of Churches** - September 23, 2014
- **Community in Schools of Lehigh Valley** - September 25, 2014
- **Catholic Charities of the Allentown Diocese** - September 26, 2014
- **Lehigh Center for Independent Living** - September 29, 2014
- **Lehigh Valley Community Land Trust** - September 30, 2014
- **Lehigh Valley Community Land Trust for NSP** - September 30, 2014

Lehigh County had no findings from the onsite monitoring.

### **Citizen Participation Plan 91.105(d); 91.115(d)**

#### **Description of the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.**

Lehigh County placed the FY 2013 CAPER document on public display for a period of 15 days beginning on Friday, December 12, 2014 through Friday, December 26, 2014. A copy of the Public Notice was published in the "Morning Call" on Thursday, December 11, 2014, a copy of which is attached in the Citizen Participation Section of this CAPER document.

The "Draft" FY 2013 CAPER was on display at the following locations in Lehigh County:

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

No comments were received during the period the draft was on public display.

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

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

Lehigh County has not made any changes to the FY 2012-2016 Five Year Consolidated Plan and its program objectives during this reporting period.

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

- **Housing** - \$71,801.50, which is 13.14% of the total expenditures.
- **Public Facilities and Improvements** - \$206,586.50, which is 37.82% of the total expenditures.
- **Public Services** - \$120,119.34, which is 21.99% of the total expenditures.
- **General Administration and Planning** - \$147,793.06, which is 27.05% of the total expenditures.
- **Total = \$546,300.40**

The Lehigh County Timeliness Ratio of unexpended funds as a percentage of the FY 2013 CDBG allocation is 1.13, which is under the maximum 1.5 ratio.

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

- **FY 2013 Percentage of Expenditures Assisting Low- and Moderate-Income Persons and Households Either Directly or On an Area Basis** – 100.00%
- **FY 2013 Percentage of Expenditures that Benefit Low- and Moderate-Income Areas** – 31.37%
- **FY 2013 Percentage of Expenditures that Aid in the Prevention or Elimination of Slum or Blight** – 0.00

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

- **Extremely Low Income (<=30%)** – 94.54%
- **Low Income (30-50%)** – 4.03%
- **Moderate Income (50-80%)** – 1.42%
- **Total Low- and Moderate-Income (<=80%)** – 100.00%
- **Non Low- and Moderate-Income (>80%)** – 0.00%

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

- **Actual Jobs Created** – 0

- **Actual Jobs Retained – 0**
- **Households Receiving Housing Assistance - 0**
- **Persons Assisted Directly, Primarily by Public Services and Public Facilities – 2,108**
- **Persons for Whom Services and Facilities were Available – 0**
- **Units Rehabilitated - Single Units - 0**
- **Units Rehabilitated - Multi Units Housing - 0**

During this CAPER period, the County leveraged \$275,893.94 for CDBG Activities based off the PR54 CDBG Community Development Block Grant Performance Profile Report.

During this CAPER period, none of the CDBG funds were not used to meet a National Objective. Lehigh County did not fund any projects that involved displacement and/or relocation. The County did not make any lump sum agreements during this CAPER period. The County did not do any float funded activities during this FY 2013 CAPER period. Lehigh County did not have any disallowed expenditures, nor did the County return any funds to the line-of-credit.

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

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

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

**CR-50 – Section 3 Report**

Attached are the Section 3 Summary Report HUD – 60002 for the CDBG Program for Lehigh County.



**SECTION 3 Summary Report**Economic Opportunities for  
Low - and Very Low-Income Persons**Part II: Contracts Awarded**

1. Construction Contracts	\$	-
A. Total dollar amount of all contracts awarded on the project	\$	-
B. Total dollar amount of contracts awarded to Section 3 businesses	\$	-
C. Percentage of the total dollar amount that was awarded to Section 3 businesses		0.00%
D. Total number of Section 3 businesses receiving contracts		0
1. Non-Construction Contracts	\$	-
A. Total dollar amount of all non-construction contracts awarded on the project/activity	\$	-
B. Total dollar amount of non-construction contracts awarded to Section 3 businesses	\$	-
C. Percentage of the total dollar amount that was awarded to Section 3 businesses		0.00%
D. Total number of Section 3 businesses receiving non-construction contracts		0

**Part III: Summary**

Indicate the efforts made to direct the employment and other economic opportunities generated by HUD financial assistance for housing and community development programs, to the greatest extent feasible, toward low-and very low-income persons, particularly those who are recipients of government assistance for housing. (Check all that apply.)

Included Section 3 clause in covered solicitations and contracts. Refrained from contracting with enterprises in violation of Section 3.

Other; describe below.

**CR-55 – IDIS Reports**

Attached are the following U.S. Department of Housing and Urban Development (HUD) Reports from IDIS for the period from October 1, 2013 through September 30, 2014.

Attached are the following IDIS reports:

- IDIS Report PR26 – CDBG Financial Summary
- IDIS Report PR01 – HUD Grants and Program Income
- IDIS Report PR06 – Summary of Consolidated Plans





Office of Community Planning and Development  
 U.S. Department of Housing and Urban Development  
 Integrated Disbursement and Information System  
 PR26 - CDBG Financial Summary Report  
 Program Year 2013  
 LEHIGH COUNTY , PA

DATE: 12-09-14  
 TIME: 9:25  
 PAGE: 1

PART I: SUMMARY OF CDBG RESOURCES

01 UNEXPENDED CDBG FUNDS AT END OF PREVIOUS PROGRAM YEAR	520,929.32
02 ENTITLEMENT GRANT	1,151,731.00
03 SURPLUS URBAN RENEWAL	0.00
04 SECTION 108 GUARANTEED LOAN FUNDS	0.00
05 CURRENT YEAR PROGRAM INCOME	0.00
05a CURRENT YEAR SECTION 108 PROGRAM INCOME (FOR SI TYPE)	0.00
06 RETURNS	0.00
07 ADJUSTMENT TO COMPUTE TOTAL AVAILABLE	0.00
08 TOTAL AVAILABLE (SUM, LINES 01-07)	1,672,660.32

PART II: SUMMARY OF CDBG EXPENDITURES

09 DISBURSEMENTS OTHER THAN SECTION 108 REPAYMENTS AND PLANNING/ADMINISTRATION	398,507.34
10 ADJUSTMENT TO COMPUTE TOTAL AMOUNT SUBJECT TO LOW/MOD BENEFIT	0.00
11 AMOUNT SUBJECT TO LOW/MOD BENEFIT (LINE 09 + LINE 10)	398,507.34
12 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	147,793.06
13 DISBURSED IN IDIS FOR SECTION 108 REPAYMENTS	0.00
14 ADJUSTMENT TO COMPUTE TOTAL EXPENDITURES	0.00
15 TOTAL EXPENDITURES (SUM, LINES 11-14)	546,300.40
16 UNEXPENDED BALANCE (LINE 08 - LINE 15)	1,126,359.92

PART III: LOWMOD BENEFIT THIS REPORTING PERIOD

17 EXPENDED FOR LOW/MOD HOUSING IN SPECIAL AREAS	0.00
18 EXPENDED FOR LOW/MOD MULTI-UNIT HOUSING	0.00
19 DISBURSED FOR OTHER LOW/MOD ACTIVITIES	398,507.34
20 ADJUSTMENT TO COMPUTE TOTAL LOW/MOD CREDIT	0.00
21 TOTAL LOW/MOD CREDIT (SUM, LINES 17-20)	398,507.34
22 PERCENT LOW/MOD CREDIT (LINE 21/LINE 11)	100.00%

LOW/MOD BENEFIT FOR MULTI-YEAR CERTIFICATIONS

23 PROGRAM YEARS(PY) COVERED IN CERTIFICATION	PY: 2013 PY: 2014 PY: 2015
24 CUMULATIVE NET EXPENDITURES SUBJECT TO LOW/MOD BENEFIT CALCULATION	398,507.34
25 CUMULATIVE EXPENDITURES BENEFITING LOW/MOD PERSONS	398,507.34
26 PERCENT BENEFIT TO LOW/MOD PERSONS (LINE 25/LINE 24)	100.00%

PART IV: PUBLIC SERVICE (PS) CAP CALCULATIONS

27 DISBURSED IN IDIS FOR PUBLIC SERVICES	120,119.34
28 PS UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	10,846.80
29 PS UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	4,966.14
30 ADJUSTMENT TO COMPUTE TOTAL PS OBLIGATIONS	0.00
31 TOTAL PS OBLIGATIONS (LINE 27 + LINE 28 - LINE 29 + LINE 30)	126,000.00
32 ENTITLEMENT GRANT	1,151,731.00
33 PRIOR YEAR PROGRAM INCOME	0.00
34 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PS CAP	0.00
35 TOTAL SUBJECT TO PS CAP (SUM, LINES 32-34)	1,151,731.00
36 PERCENT FUNDS OBLIGATED FOR PS ACTIVITIES (LINE 31/LINE 35)	10.94%

PART V: PLANNING AND ADMINISTRATION (PA) CAP

37 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	147,793.06
38 PA UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	82,552.94
39 PA UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	0.00
40 ADJUSTMENT TO COMPUTE TOTAL PA OBLIGATIONS	0.00
41 TOTAL PA OBLIGATIONS (LINE 37 + LINE 38 - LINE 39 +LINE 40)	230,346.00
42 ENTITLEMENT GRANT	1,151,731.00
43 CURRENT YEAR PROGRAM INCOME	0.00
44 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PA CAP	0.00
45 TOTAL SUBJECT TO PA CAP (SUM, LINES 42-44)	1,151,731.00
46 PERCENT FUNDS OBLIGATED FOR PA ACTIVITIES (LINE 41/LINE 45)	20.00%



Office of Community Planning and Development  
 U.S. Department of Housing and Urban Development  
 Integrated Disbursement and Information System  
 PR26 - CDBG Financial Summary Report  
 Program Year 2013  
 LEHIGH COUNTY , PA

DATE: 12-09-14  
 TIME: 9:25  
 PAGE: 2

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

Report returned no data.

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

Report returned no data.

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

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2007	12	19	5647888	COUNTYWIDE HOUSING REHAB DELIVERY	14H	LMH	\$2,585.88
2007	12	91	5647888	Countywide Rehab Construction Costs	14A	LMH	\$14,715.00
2010	14	109	5693949	County Wide Housing Program Construction Costs	14A	LMH	\$17,280.00
2010	14	109	5725917	County Wide Housing Program Construction Costs	14A	LMH	\$3,020.00
2010	15	110	5647897	County Wide Housing Rehab Program Delivery	14H	LMH	\$7,559.52
2010	15	110	5663227	County Wide Housing Rehab Program Delivery	14H	LMH	\$2,852.70
2010	15	110	5725917	County Wide Housing Rehab Program Delivery	14H	LMH	\$1,021.20
2010	15	110	5757734	County Wide Housing Rehab Program Delivery	14H	LMH	\$212.00
2011	16	133	5647907	County Wide Housing Rehabilitation Delivery Costs	14H	LMH	\$1,531.80
2011	16	133	5663224	County Wide Housing Rehabilitation Delivery Costs	14H	LMH	\$4,795.20
2011	16	133	5725905	County Wide Housing Rehabilitation Delivery Costs	14H	LMH	\$5,305.80
2011	19	179	5725905	Commerical Motor Vehicle Training	05H	LMCSV	\$4,966.14
2012	2	142	5647920	Catasauqua Borough Curb Cuts Project	03L	LMC	\$58,000.00
2012	17	157	5647920	CWHR Program Delivery Costs	14H	LMH	\$3,851.70
2012	17	157	5663222	CWHR Program Delivery Costs	14H	LMH	\$1,698.30
2012	17	157	5725898	CWHR Program Delivery Costs	14H	LMH	\$5,372.40
2013	3	163	5757571	Emmaus Borough Curb Cuts	03L	LMC	\$23,586.50
2013	4	164	5757571	Fountain Hill Borough Street Reconstruction	03K	LMA	\$125,000.00
2013	11	168	5693946	Self Sufficiency & Intervention Program	05Q	LMC	\$2,388.13
2013	11	168	5725894	Self Sufficiency & Intervention Program	05Q	LMC	\$13,798.16
2013	11	168	5757571	Self Sufficiency & Intervention Program	05Q	LMC	\$6,258.51
2013	12	170	5663220	Career Services Program	05H	LMC	\$4,733.05
2013	12	170	5693946	Career Services Program	05H	LMC	\$5,081.92
2013	12	170	5725894	Career Services Program	05H	LMC	\$4,838.12
2013	12	170	5757571	Career Services Program	05H	LMC	\$6,996.91
2013	13	173	5693946	COMPASS/SOAR Benefits Counseling Program	03T	LMC	\$962.22
2013	13	173	5725894	COMPASS/SOAR Benefits Counseling Program	03T	LMC	\$8,433.46
2013	13	173	5757571	COMPASS/SOAR Benefits Counseling Program	03T	LMC	\$8,762.72
2013	14	172	5725894	Commercial Motor Vehicle Training	05H	LMC	\$1,833.86
2013	15	169	5663220	PLACE Program	05B	LMC	\$4,696.32
2013	15	169	5693946	PLACE Program	05B	LMC	\$7,716.46
2013	15	169	5757571	PLACE Program	05B	LMC	\$7,987.22
2013	16	174	5663220	Meal Preparation and Delivery Program	05	LMC	\$11,174.91
2013	16	174	5693946	Meal Preparation and Delivery Program	05	LMC	\$7,827.29
2013	16	174	5725894	Meal Preparation and Delivery Program	05	LMC	\$1,663.94
2013	17	176	5663220	Legal Aide for Low to Moderate Income Residents	05C	LMC	\$5,315.40
2013	17	176	5693946	Legal Aide for Low to Moderate Income Residents	05C	LMC	\$3,612.59
2013	17	176	5725894	Legal Aide for Low to Moderate Income Residents	05C	LMC	\$1,072.01
Total							\$398,507.34

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

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2011	19	179	5725905	Commerical Motor Vehicle Training	05H	LMCSV	\$4,966.14
2013	11	168	5693946	Self Sufficiency & Intervention Program	05Q	LMC	\$2,388.13
2013	11	168	5725894	Self Sufficiency & Intervention Program	05Q	LMC	\$13,798.16



Office of Community Planning and Development  
 U.S. Department of Housing and Urban Development  
 Integrated Disbursement and Information System  
 PR26 - CDBG Financial Summary Report  
 Program Year 2013  
 LEHIGH COUNTY , PA

DATE: 12-09-14  
 TIME: 9:25  
 PAGE: 3

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2013	11	168	5757571	Self Sufficiency & Intervention Program	05Q	LMC	\$6,258.51
2013	12	170	5663220	Career Services Program	05H	LMC	\$4,733.05
2013	12	170	5693946	Career Services Program	05H	LMC	\$5,081.92
2013	12	170	5725894	Career Services Program	05H	LMC	\$4,838.12
2013	12	170	5757571	Career Services Program	05H	LMC	\$6,996.91
2013	13	173	5693946	COMPASS/SOAR Benefits Counseling Program	03T	LMC	\$962.22
2013	13	173	5725894	COMPASS/SOAR Benefits Counseling Program	03T	LMC	\$8,433.46
2013	13	173	5757571	COMPASS/SOAR Benefits Counseling Program	03T	LMC	\$8,762.72
2013	14	172	5725894	Commercial Motor Vehicle Training	05H	LMC	\$1,833.86
2013	15	169	5663220	PLACE Program	05B	LMC	\$4,696.32
2013	15	169	5693946	PLACE Program	05B	LMC	\$7,716.46
2013	15	169	5757571	PLACE Program	05B	LMC	\$7,987.22
2013	16	174	5663220	Meal Preparation and Delivery Program	05	LMC	\$11,174.91
2013	16	174	5693946	Meal Preparation and Delivery Program	05	LMC	\$7,827.29
2013	16	174	5725894	Meal Preparation and Delivery Program	05	LMC	\$1,663.94
2013	17	176	5663220	Legal Aide for Low to Moderate Income Residents	05C	LMC	\$5,315.40
2013	17	176	5693946	Legal Aide for Low to Moderate Income Residents	05C	LMC	\$3,612.59
2013	17	176	5725894	Legal Aide for Low to Moderate Income Residents	05C	LMC	\$1,072.01
Total							\$120,119.34

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

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2013	18	182	5663220	General Administration Costs	21A		\$73,755.27
2013	18	182	5693946	General Administration Costs	21A		\$74,037.79
Total							\$147,793.06

U.S. DEPARTMENT OF HOUSING AND URBAN  
DEVELOPMENT  
OFFICE OF COMMUNITY PLANNING AND DEVELOPMENT  
PR01 - HUD Grants and Program Income

DATE: 12/9/2014  
TIME: 8:32:38 AM  
PAGE: 1/1

IDIS

Program	Fund Type	Grantee Name	Grant Number	Authorized Amount	Suballocated Amount	Amount Committed to Activities	Net Drawn Amount	YTD Net Draw Amount	Available to Commit	Available to Draw	Recapture Amount		
CDBG	EN	LEHIGH COUNTY	B07UC420011	\$1,432,485.00	\$0.00	\$1,432,485.00	\$1,432,485.00	\$0.00	\$0.00	\$0.00	\$0.00		
			B08UC420011	\$1,383,561.00	\$0.00	\$1,383,561.00	\$1,383,561.00	\$0.00	\$0.00	\$0.00	\$0.00		
			B09UC420011	\$1,400,232.00	\$0.00	\$1,400,232.00	\$1,400,232.00	\$0.00	\$0.00	\$0.00	\$0.00		
			B10UC420011	\$1,572,129.00	\$0.00	\$1,572,129.00	\$1,572,129.00	\$0.00	\$0.00	\$0.00	\$0.00		
			B11UC420011	\$1,312,671.00	\$0.00	\$1,312,671.00	\$1,312,671.00	\$0.00	\$0.00	\$0.00	\$0.00		
			B12UC420011	\$1,139,549.00	\$0.00	\$1,139,549.00	\$1,139,549.00	\$465,931.67	\$0.00	\$0.00	\$0.00		
			B13UC420011	\$1,151,731.00	\$0.00	\$1,111,731.00	\$367,537.07	\$367,537.07	\$40,000.00	\$784,193.93	\$0.00		
			B14UC420011	\$1,152,713.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,152,713.00	\$1,152,713.00	\$0.00		
			<b>LEHIGH COUNTY Subtotal:</b>			<b>\$10,545,071.00</b>	<b>\$0.00</b>	<b>\$9,352,358.00</b>	<b>\$8,608,164.07</b>	<b>\$833,468.74</b>	<b>\$1,192,713.00</b>	<b>\$1,936,906.93</b>	<b>\$0.00</b>
			<b>EN Subtotal:</b>			<b>\$10,545,071.00</b>	<b>\$0.00</b>	<b>\$9,352,358.00</b>	<b>\$8,608,164.07</b>	<b>\$833,468.74</b>	<b>\$1,192,713.00</b>	<b>\$1,936,906.93</b>	<b>\$0.00</b>
			SU	LEHIGH COUNTY	B99DC420001	\$1,660,276.38	\$0.00	\$1,660,276.38	\$1,660,276.38	\$0.00	\$0.00	\$0.00	\$0.00
					B00DC420001	\$643,105.00	\$0.00	\$643,105.00	\$643,105.00	\$0.00	\$0.00	\$0.00	\$0.00
					B01DC420001	\$689,936.00	\$0.00	\$689,936.00	\$689,936.00	\$0.00	\$0.00	\$0.00	\$0.00
					B02DC420001	\$708,455.00	\$0.00	\$708,455.00	\$708,455.00	\$0.00	\$0.00	\$0.00	\$0.00
B03DC420001	\$720,632.00	\$0.00			\$720,632.00	\$720,632.00	\$0.00	\$0.00	\$0.00	\$0.00			
B04DC420001	\$743,226.00	\$0.00			\$743,226.00	\$743,226.00	\$0.00	\$0.00	\$0.00	\$0.00			
B05DC420001	\$697,246.00	\$0.00			\$697,246.00	\$697,246.00	\$0.00	\$0.00	\$0.00	\$0.00			
B06DC420001	\$581,844.00	\$0.00			\$581,844.00	\$581,844.00	\$0.00	\$0.00	\$0.00	\$0.00			
<b>LEHIGH COUNTY Subtotal:</b>					<b>\$6,444,720.38</b>	<b>\$0.00</b>	<b>\$6,444,720.38</b>	<b>\$6,444,720.38</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	
<b>SU Subtotal:</b>					<b>\$6,444,720.38</b>	<b>\$0.00</b>	<b>\$6,444,720.38</b>	<b>\$6,444,720.38</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	
PI	LEHIGH COUNTY	B09UC420011	\$19,960.00	\$0.00	\$19,960.00	\$19,960.00	\$0.00	\$0.00	\$0.00	\$0.00			
		B11UC420011	\$6,375.30	\$0.00	\$6,375.30	\$6,375.30	\$0.00	\$0.00	\$0.00	\$0.00			
		<b>LEHIGH COUNTY Subtotal:</b>			<b>\$26,335.30</b>	<b>\$0.00</b>	<b>\$26,335.30</b>	<b>\$26,335.30</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>		
<b>PI Subtotal:</b>			<b>\$26,335.30</b>	<b>\$0.00</b>	<b>\$26,335.30</b>	<b>\$26,335.30</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>			
<b>GRANTEE</b>				<b>\$10,571,406.30</b>	<b>\$0.00</b>	<b>\$15,823,413.68</b>	<b>\$15,079,219.75</b>	<b>\$833,468.74</b>	<b>\$1,192,713.00</b>	<b>\$1,936,906.93</b>	<b>\$0.00</b>		

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

DATE: 12/9/2014  
TIME: 8:39:25 AM  
PAGE: 1/2

IDIS

Plan IDIS Year Project	Project Title and Description	Program	Project Estimate	Committed Amount	Amount Drawn Thru Report Year	Amount Available to Draw	Amount Drawn in Report Year	
2013 1	Borough of Catasauqua - Demolition of 405 Crane Street and Repair of Common Wall	Demolition of dwelling and ancillary costs are \$32,500. Wall Repair is \$15,500.	CDBG	\$40,000.00	\$0.00	\$0.00	\$0.00	\$0.00
2	Borough of Coopersburg - Sanitary Sewer Rehabilitation	Sanitary sewer rehabilitation project of facilities in C.T. 69.02, B.G. 2.	CDBG	\$175,000.00	\$175,000.00	\$0.00	\$175,000.00	\$0.00
3	Borough of Emmaus - Curb Cuts	Removal of architectural barriers in various areas of the community.	CDBG	\$40,000.00	\$40,000.00	\$23,586.50	\$16,413.50	\$23,586.50
4	Borough of Fountain Hill - Cherokee Street Reconstruction and Curb Cuts	Two blocks of Cherokee Street. One block to be fully reconstructed, including 4 new curb cuts. Another block to be milled and resurfaced, including 12 new curb cuts. BG 6800-1 (49.8% LMI).	CDBG	\$125,000.00	\$125,000.00	\$125,000.00	\$0.00	\$125,000.00
5	Lower Macungie - Curb Cuts	Removal of architectural barriers in various areas of the community.	CDBG	\$50,000.00	\$50,000.00	\$0.00	\$50,000.00	\$0.00
6	Borough of Macungie - Curb Cuts	Removal of architectural barriers in various areas of the community.	CDBG	\$50,000.00	\$50,000.00	\$0.00	\$50,000.00	\$0.00
7	Borough of Slatington - Street Reconstruction and Curb Cuts	Street resurfacing and curb cuts along a section of E. Washington Street. Section runs along 2nd to Park Ave. Storm water management along street additional benefit. BG 005100-2 (58.6% LMI).	CDBG	\$84,000.00	\$84,000.00	\$0.00	\$84,000.00	\$0.00
8	New Bethany Ministries - Columbia House Fire Escape Reconstruction	Funding to replace a fire escape and repair of the roof to which it is attached. An engineering study will also be funded.	CDBG	\$70,000.00	\$70,000.00	\$0.00	\$70,000.00	\$0.00
9	County-wide Housing Rehab - Housing Rehabilitation Financing	Funding to rehabilitation owner-occupied LMI properties. Program delivery is also included.	CDBG	\$116,385.00	\$116,385.00	\$0.00	\$116,385.00	\$0.00
10	Community Action Committee of the Lehigh Valley - Community Land Trust Housing Acquisition	Funding to acquire a property which will be remain affordable in perpetuity.	CDBG	\$45,000.00	\$45,000.00	\$0.00	\$45,000.00	\$0.00
11	Catholic Charities - Self-sufficiency & Intervention Program	Funding for staff time spent working directly with clients from eligible areas of Lehigh County. Emergency subsistence payments (rent and utilities) up to 3 months.	CDBG	\$29,700.00	\$29,700.00	\$22,444.80	\$7,255.20	\$22,444.80
12	Communities in Schools of the Lehigh Valley - CIS Career Services at Whitehall High School	Funding for 1/2 FTJE of a Career Coordinator position. Will provide career counseling and job readiness to 20 at-risk high school students in Whitehall and Coplay School District.	CDBG	\$21,650.00	\$21,650.00	\$21,650.00	\$0.00	\$21,650.00
13	Lehigh County Conference of Churches - COMPASS/SOAR Benefits Counseling	Funding for Benefits Specialist to work directly with LMI clients of Lehigh County. Short-term income support to those clients is also requested.	CDBG	\$21,750.00	\$21,750.00	\$18,158.40	\$3,591.60	\$18,158.40
14	Lehigh Carbon Community College - Commercial Motor Vehicle Training for Low-Income County Residents	Enhanced training scholarship program for CMV Class A licenses.	CDBG	\$6,800.00	\$1,833.86	\$1,833.86	\$0.00	\$1,833.86

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

DATE: 12/9/2014  
TIME: 8:39:25 AM  
PAGE: 2/2

IDIS

Plan IDIS Year Project	Project Title and Description		Program	Project Estimate	Committed Amount	Amount Drawn Thru Report Year	Amount Available to Draw	Amount Drawn in Report Year
2013 15	Lehigh Valley Center for Independent Living - PLACE Program	Provide housing search and support services to twenty (20) residents, host two workshops geared toward educating landlords, and distribute 500 brochures to area landlords on benefits of renting to persons with disabilities.	CDBG	\$20,400.00	\$20,400.00	\$20,400.00	\$0.00	\$20,400.00
16	Meals on Wheels of Lehigh County - Meal Preparation and Delivery	77 residents: 17,970 meals to disabled and elderly residents in County.	CDBG	\$20,666.14	\$20,666.14	\$20,666.14	\$0.00	\$20,666.14
17	North Penn Legal Services - LMI Legal Aide	Legal Aide to LMI regarding Fair Housing and general housing legal issues.	CDBG	\$10,000.00	\$10,000.00	\$10,000.00	\$0.00	\$10,000.00
18	Administration	General Program Administration.	CDBG	\$230,346.00	\$230,346.00	\$147,793.06	\$82,552.94	\$147,793.06
19	General Administration	General CDBG Administrative Costs	CDBG	\$230,346.00	\$0.00	\$0.00	\$0.00	\$0.00
20	Coopersburg Borough Sanitary Sewer Rehabilitation	Sanitary Sewer Rehabilitation in Low to Moderate Census Tract	CDBG	\$175,000.00	\$0.00	\$0.00	\$0.00	\$0.00
21	Emmaus Borough Curb Cuts Program	Removal of Architectural Barriers in various areas of community.	CDBG	\$40,000.00	\$0.00	\$0.00	\$0.00	\$0.00

**CR-60 – Fair Housing**

Attached are the following fair housing items:

- Flyers from the Lehigh Fair Housing Summit
- Lehigh Valley Fair Housing Summit Survey Results
- Lehigh Valley Association of REALTORS Press Release
- The new RAI Impediments for Lehigh County



# Lehigh Valley Association of REALTORS® presents...



## Lehigh Valley Fair Housing Summit

Practical Training for REALTORS®, Housing Professionals and Community Leaders

# April 24, 2014

## 8:30 AM to 12:30 PM

Doors Open 8 AM for Breakfast & Networking | Holiday Inn Allentown Center City

**\$25 per person | register online at [lvar.org/FairHousingSummit](http://lvar.org/FairHousingSummit)**

This half-day event will bring together Fair Housing experts to discuss real world scenarios about fair housing challenges in the Lehigh Valley and how REALTORS®, housing professionals, and community leaders can become more knowledgeable about compliance with fair housing laws.

### Eligible for 3.5 Hours CE Credits for Realtors®

Hear from industry leaders on topics including:

- Address by Jane Vincent, HUD Regional Administrator for Region III
- State of Fair Housing in the Lehigh Valley and Beyond
- Fair Housing Expert Panel
- Fair Housing Enforcement and Testing
- Disability Discrimination in Property Management and Rentals
- Zoning: Obstacles to Fair Housing Compliance

Brought to you in partnership with:

*Legal Advocates For Low-income Families*

**NPLS**

NORTH PENN LEGAL SERVICES

Sponsored by:

**KNBT**

Division of National Penn Bank

BANKING | INSURANCE | INVESTMENTS | TRUST

**Sponsorship Opportunities Available!**

Contact [melody@lvar.org](mailto:melody@lvar.org) for more information!







LEHIGH VALLEY  
ASSOCIATION OF  
**REALTORS**

PRESENTS



# Lehigh Valley Fair Housing Summit

Practical Training for REALTORS®,  
Housing Professionals  
& Community Leaders

8:30 am – 12:30 pm  
Holiday Inn  
Allentown Center City  
\$25 per person

**April 24**

INFO & REGISTRATION

**[LVAR.org/FairHousingSummit](http://LVAR.org/FairHousingSummit)**

In Partnership with NORTH PENN LEGAL SERVICES

# Lehigh Valley Fair Housing Summit

Practical Training for REALTORS®, Housing Professionals and Community Leaders

**April 24, 2014 {8:30 AM to 12:30 PM}**

## Welcome and Introduction

- Ryan T. Conrad, CEO of the Lehigh Valley Association of REALTORS®
- Victoria A. Coyle, Esq., Executive Director of North Penn Legal Services
- Mayor Ed Pawlowski, City of Allentown
- "Seven Days" Video by the National Fair Housing Alliance

## PART I: State of Fair Housing in the Lehigh Valley and Beyond

### 1. Address by Jane Vincent, HUD Regional Administrator for Region III

### 2. Expert Panel

*Moderator: Lori Sywensky, Northampton County Community Development Administrator*

- Melody Taylor-Blancher, HUD Region III Director Fair Housing and Equal Opportunity
- Fred Underwood, Diversity Director, NAR
- Christopher Reid, Esq., Board President - Community Action Committee of the Lehigh Valley and President of the Northampton County Bar Association
- Maurice Muhammad, REALTOR® and President of the Minority Real Estate Network of the Lehigh Valley

## BREAK

## PART II: Fair Housing Enforcement and Testing

*James Berry, Executive Director, and Megan Bolin, Outreach and Communications Coordinator - Fair Housing Council of Suburban Philadelphia*

- Overview of fair housing enforcement and testing
- FHCSF Report on Fair Housing Testing in Lehigh Valley 2011-2013
- Recommendations for providers, advocates and communities

## BREAK

## PART III: Attendees choose between two concurrent sessions:

### 1. Disability Discrimination in Property Management and Rentals (Main Ballroom)

*Patricia McGarvey-Knebels, Esq., HUD Trial Attorney*

- Overview of the Fair Housing Act
- Disability discrimination including reasonable accommodations and reasonable modifications
- Assistance animals (service animals and emotional support animals)

### 2. Zoning: Obstacles to Fair Housing Compliance (Ballroom IV)

*Becky Bradley, Executive Director, Lehigh Valley Planning Commission*

- Overview of the Fair Housing Act as it relates to zoning
- Provisions in zoning ordinances that raise fair housing compliance issues
- Best practices in drafting/revising zoning ordinances

## Closing Remarks (Return to Main Ballroom)

**Join the Conversation: #LVFairHousing**



### Ryan T. Conrad, CAE, RCE



Mr. Conrad is Chief Executive Officer of the Lehigh Valley Association of REALTORS® (LVAR), an organization representing 2,000 real estate professionals. Prior to becoming CEO in 2011, he served as the Association's Director of Government Affairs.

Ryan was recently elected to a second four-year term on the Lower Macungie Township Board of Commissioners where he serves as President.

Contact: (484) 821-0501; [ryan@lvar.org](mailto:ryan@lvar.org).

### Jane Vincent



Appointed by President Barack Obama, Ms. Vincent is the Regional Administrator for the U.S. Department of Housing and Urban Development, Region III which includes the District of Columbia, Delaware, Maryland, Pennsylvania, Virginia and West

Virginia. In this role, Jane works with others to create strong, sustainable, inclusive communities and quality affordable homes for all. She is responsible for the oversight of a \$47.3 billion dollar portfolio of programs and services and more than 600 employees.

Contact: (215) 656-0600; [jane.vincent@hud.gov](mailto:jane.vincent@hud.gov).

### Fred Underwood



Mr. Underwood is Director of Diversity at the National Association of REALTORS® in Washington DC. Since 1990, Fred has staffed NAR's Equal Opportunity - Cultural Diversity Committee, and leads the development of NAR's policy on

fair housing and diversity. He has a Masters Degree in Urban Planning and Policy from the University of Illinois at Chicago.

Contact: (202) 383-1132; [FUnderwood@realtors.org](mailto:FUnderwood@realtors.org).

### James Berry

Mr. Berry, Executive Director of the Fair Housing Council of Suburban Philadelphia since 1992, has 37 years of fair housing experience. He has worked closely with HUD, Pennsylvania Human Relations Commission, Department of Justice, the National Community Reinvestment Coalition, and the National Fair Housing Alliance to test for fair housing compliance and has successfully resolved over 220 administrative complaints and 46 federal lawsuits alleging housing discrimination.

Contact: (267) 419-8918; [berry@fhcsp.com](mailto:berry@fhcsp.com)

### Becky Bradley



Ms. Bradley is Executive Director of the Lehigh Valley Planning Commission, a role she began in August of 2013 after eight years with the City of Easton as their former Director of Planning and Codes. During her tenure in Easton, Becky led the city's efforts

to implement a local historic district, initiate a new comprehensive plan and oversee a complete rewrite of the city's Subdivision and Land Development Ordinance. She holds a Master of City and Regional Planning degree from the University of Pennsylvania and a bachelor's degree from Southeast Missouri State University.

Contact: (610) 264-4544; [bab@lvpc.org](mailto:bab@lvpc.org)

### Victoria A. Coyle, Esq.



Ms. Coyle began her tenure as Executive Director at NPLS in 2003 immediately after the completion of a four program merger. Her education includes a bachelor's degree from Mount Holyoke College and a Juris Doctorate from American

University, Washington College of Law. Ms. Coyle is an active member of the Northampton County Bar Association. Previous leadership positions include serving as the Executive Director at Turning Point of Lehigh Valley, Inc. for four years and Assistant Solicitor for the City of Bethlehem.

Contact: (610) 317-5314; [vcoyle@northpennlegal.org](mailto:vcoyle@northpennlegal.org).

### Lori Sywensky

Ms. Sywensky is Community Development Administrator for Northampton County. In that role, she administers programs and helps to shape policy on a number of community revitalization initiatives, including affordable housing efforts. She is Vice-Chair of the Northampton County Housing Authority, a board member of the Community Action Committee of the Lehigh Valley and the Lehigh Valley Community Land Trust, and a Commissioner on the Lehigh Valley Planning Commission.

Contact: (610) 559-3200 x2;

[Sywensky@northamptoncounty.org](mailto:Sywensky@northamptoncounty.org).

### Christopher Reid, Esq.



Mr. Reid began his professional career as an associate attorney with the Easton firm of Seidel Cohen & Hof LLC in 1999. In 2003, Mr. Reid was made a member of the firm, and in 2007, the law firm of Seidel Cohen Hof & Reid LLC opened its Bethlehem office.

He received his Bachelor of Arts degree, cum laude, from the University of Toledo in 1996 and his Juris Doctor degree from Vermont Law School in 1999. Mr. Reid currently serves on the Northampton County Bar Association Board of Governors as President Elect and is President of the Board of Directors for the Community Action Committee of the Lehigh Valley.

Contact: (610) 365-1316; [www.abelawyers.com/](http://www.abelawyers.com/)

Contact-Us.shtml.

### Megan Bolin

Ms. Bolin, Outreach and Communications Coordinator for the Fair Housing Council of Suburban Philadelphia has 9 years of fair housing experience. Since joining FHCSF in 2005 as the previous Test Coordinator, Ms. Bolin has coordinated over 1,000 testing investigations throughout the Greater Philadelphia region and the Lehigh Valley. She authored testing audits on housing discrimination trends and has presented over 200 education programs for the housing industry, government agencies and nonprofits serving members of protected classes.

Contact: (267) 419-8918; [bolin@fhcsp.com](mailto:bolin@fhcsp.com)

### Honorable Ed Pawlowski



Mr. Pawlowski is the Mayor of the City of Allentown, Pennsylvania elected in 2005 and re-elected by a nearly 3-1 margin in November 2009. The tenure of the Pawlowski administration has been characterized by

action, purpose, a strong sense of urgency, and endless energy. Mayor Pawlowski received his master's degree in urban planning and public policy from the University of Illinois and his bachelor's degree from the Moody Bible Institute in Chicago.

Contact: (610) 437-7546; [pawlowski@allentowncity.org](mailto:pawlowski@allentowncity.org).

### Melody Taylor-Blancher



Ms. Taylor-Blancher is the Regional Director for the U.S. Department of Housing and Urban Development's Region III Mid Atlantic Office of Fair Housing and Equal Opportunity. Ms. Taylor-Blancher is responsible for the

leadership and management of five offices which include Philadelphia and Pittsburgh in Pennsylvania, Baltimore, Maryland; Richmond, Virginia and the District of Columbia. Her contributions and commitment to fair housing spans a period of 20 years.

Contact: (215) 861-7643;

[melody.c.taylor-blancher@hud.gov](mailto:melody.c.taylor-blancher@hud.gov).

### Maurice Muhammad



Mr. Muhammad is a Broker and Manager of Operations for Progressive Realty, Inc. in Allentown, Pennsylvania, a full service real estate company, with commercial focus but a residential passion. The company offers property management,

leasing, rentals, sales, and commercial leasing. Maurice is currently President of the Minority Real Estate Network of the Lehigh Valley.

Contact: (610) 439-1527; [info@progressiverealty.org](mailto:info@progressiverealty.org).

### Patricia McGarvey Knebel



Ms. McGarvey Knebel is an attorney with the U.S. Department of Housing and Urban Development's Office of Regional Counsel in Philadelphia. In this role, Ms. Knebel handles civil rights cases as well as matters involving personnel and

administrative law and generally involve allegations of discrimination in housing under a number of federal laws including the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI and the American with Disabilities Act.

Contact: (215) 430-6664;

[Patricia.McGarvey.Knebel@hud.gov](mailto:Patricia.McGarvey.Knebel@hud.gov).

Join the Conversation: #LVFairHousing

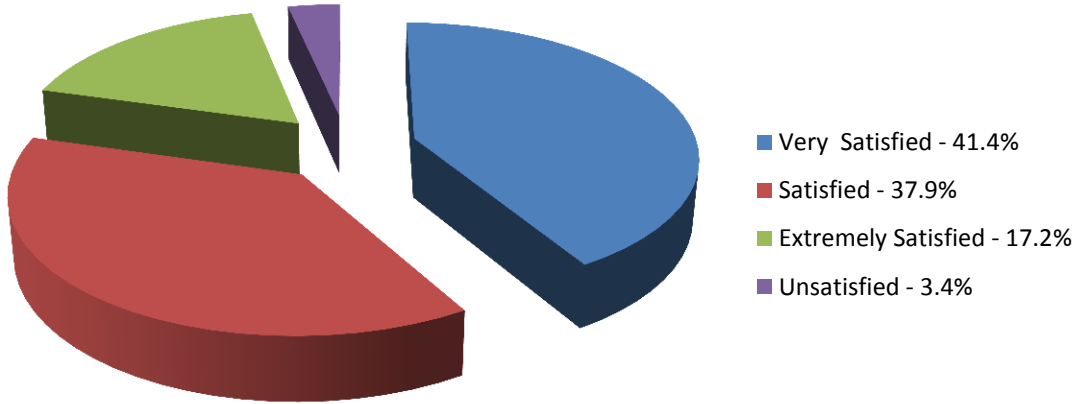
Lehigh Valley Association of REALTORS®

# Lehigh Valley Fair Housing Summit

Survey Results

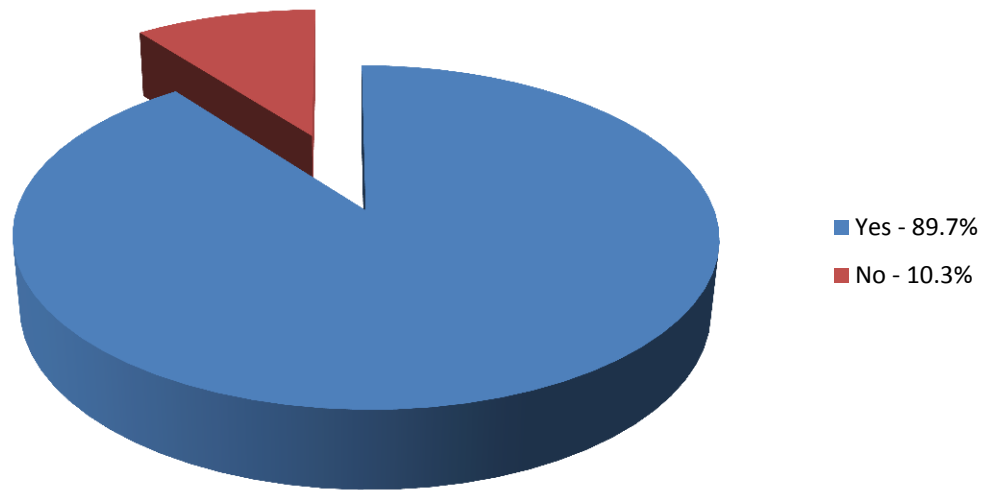
April 24, 2014  
139 Registered | 29 Survey Responses

**1. Please rate your overall satisfaction with the Lehigh Valley Fair Housing Summit on April 24, 2014:**



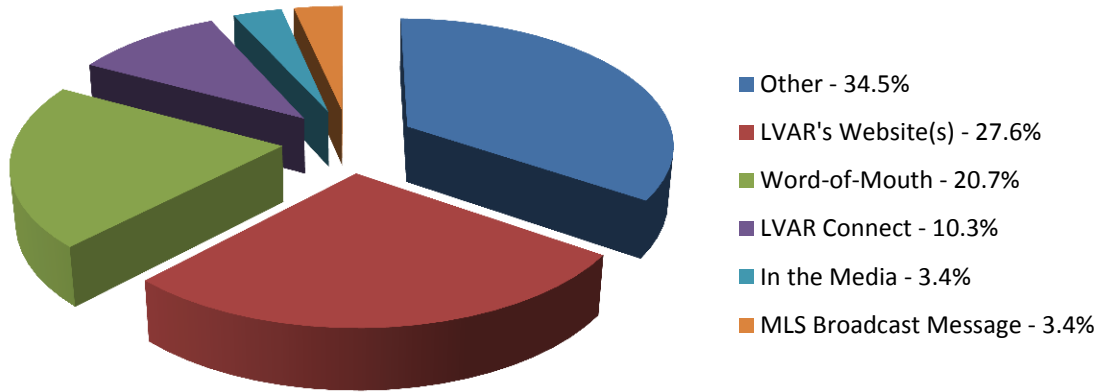
Value	Count	Percent
Very Satisfied	12	41.4%
Satisfied	11	37.9%
Extremely Satisfied	5	17.2%
Unsatisfied	1	3.4%

**2. Overall, did you find the information that was presented interesting?**



Value	Count	Percent
Yes	26	89.7%
No	3	10.3%

### 3. How did you learn about the Lehigh Valley Fair Housing Summit?

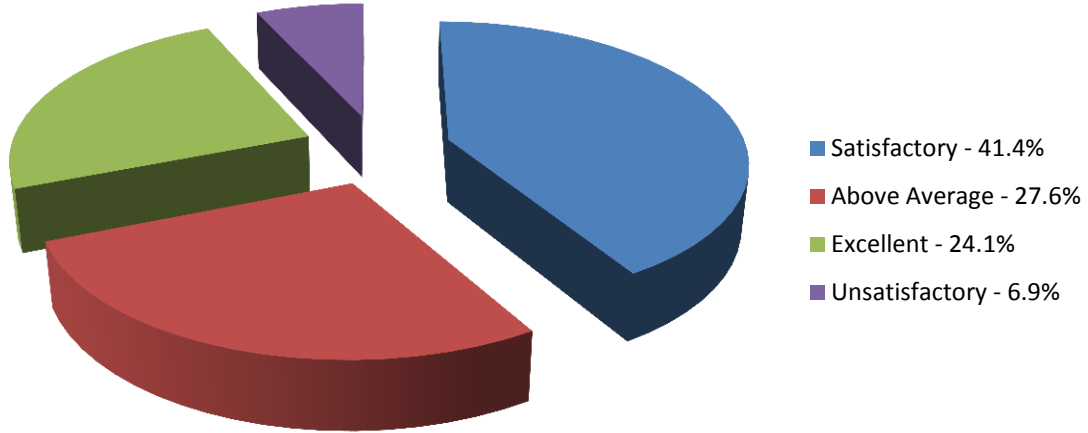


Value	Count	Percent
Other	10	34.5%
LVAR's Website(s)	8	27.6%
Word-of-Mouth (broker, colleague, instructor, etc.)	6	20.7%
LVAR Connect	3	10.3%
In the Media	1	3.4%
MLS Broadcast Message	1	3.4%

#### 4. If you selected "Other," please explain:

- Envision Lehigh Valley
- Government official who is part of the Lehigh Valley Fair Housing Consortium
- Participated as part of the planning group from the five municipalities helping to sponsor
- NPLS newsletter
- NPLS
- At office
- Staff of agency were presenters
- Advertising from NPLS
- north penn legal services
- E-mail invitation from North Penn Legal
- Housing community

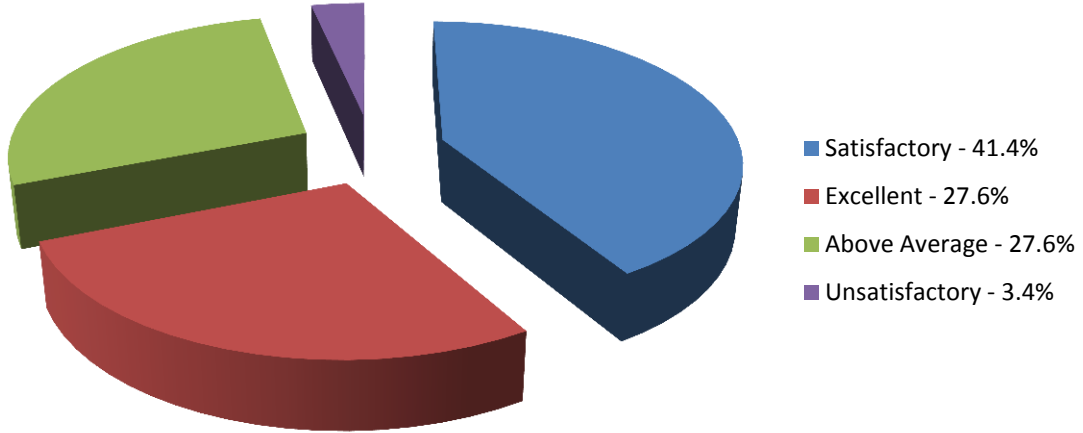
**5. Expert Panel with Melody Taylor-Blancher, Fred Underwood, Christopher Reid and Maurice Muhammad; moderated by Lori Sywensky:**



Value	Count	Percent
Satisfactory	12	41.4%
Above Average	8	27.6%
Excellent	7	24.1%
Unsatisfactory	2	6.9%

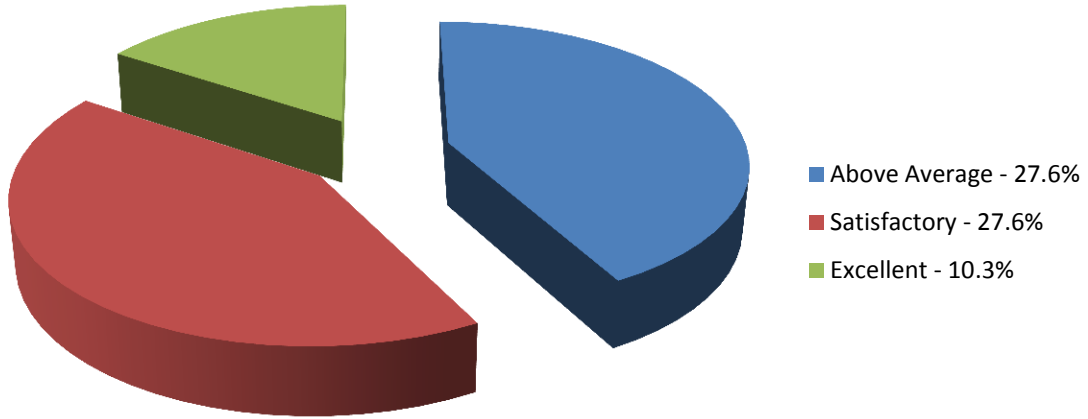


**6. Fair Housing Enforcement and Testing; James Berry and Megan Bolin of the Fair Housing Council of Suburban Philadelphia:**



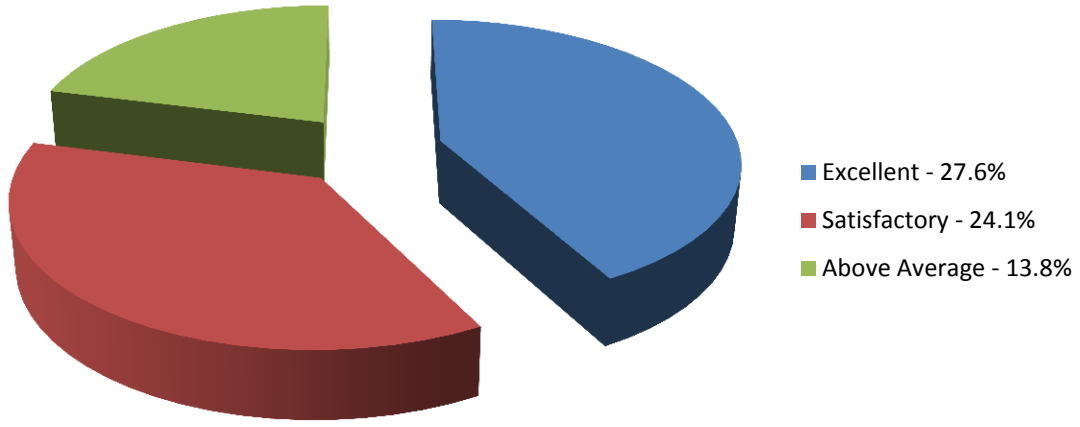
Value	Count	Percent
Satisfactory	12	41.4%
Excellent	8	27.6%
Above Average	8	27.6%
Unsatisfactory	1	3.4%

**7. Disability Discrimination in Property Management and Rentals; Patricia McGarvey-Knebels, Esq., HUD Attorney:**



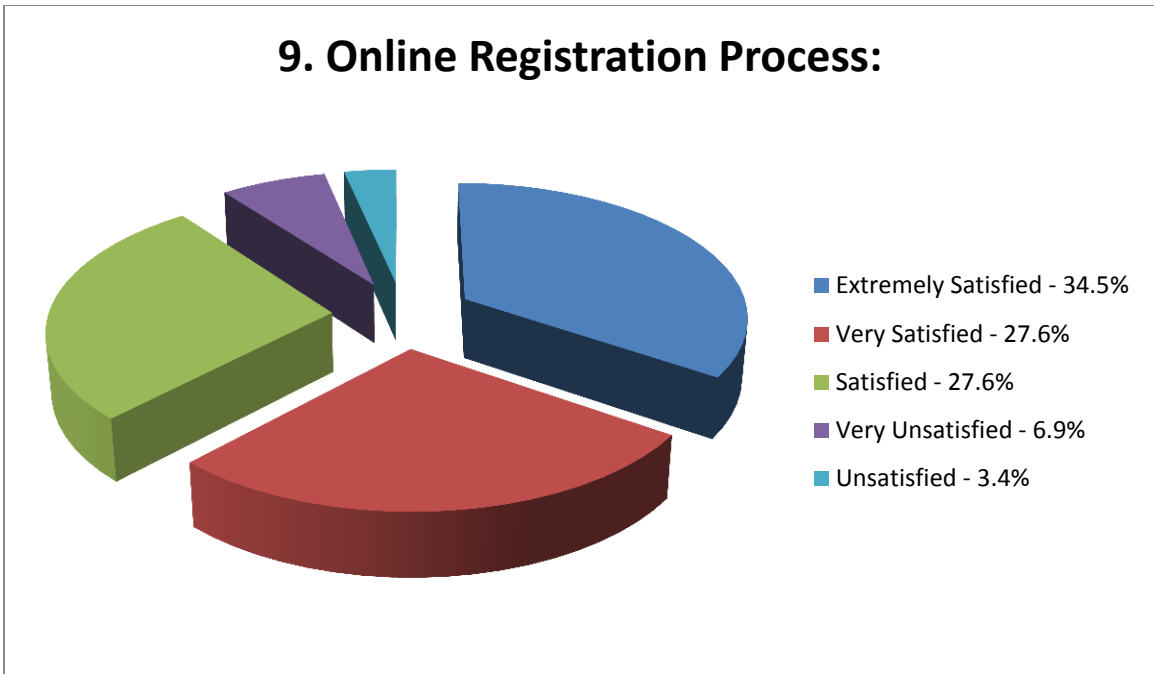
Value	Count	Percent
Above Average	8	27.6%
Satisfactory	8	27.6%
Excellent	3	10.3%

**8. Zoning: Obstacles to Fair Housing Compliance; Becky Bradley, Lehigh Valley Planning Commission:**



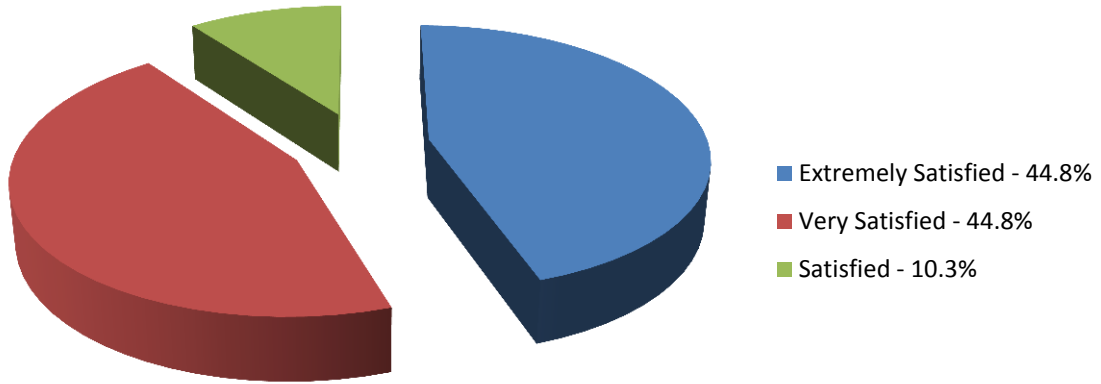
Value	Count	Percent
Excellent	8	27.6%
Satisfactory	7	24.1%
Above Average	4	13.8%

### 9. Online Registration Process:



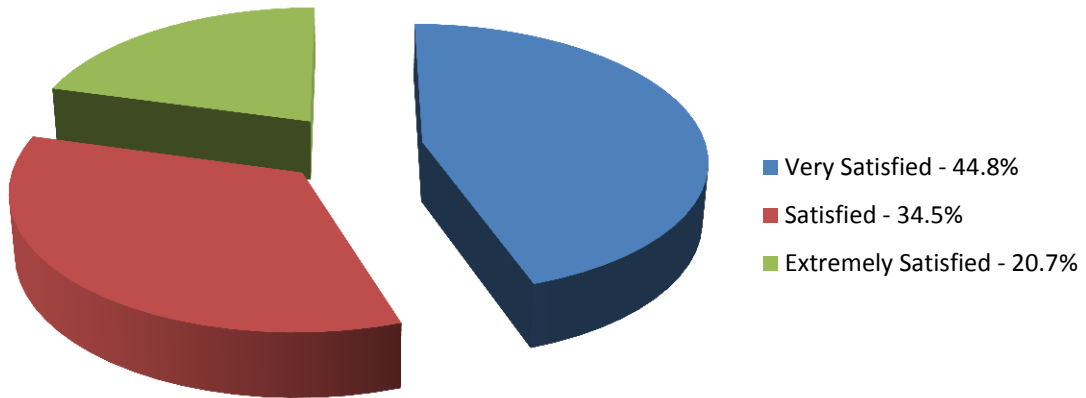
Value	Count	Percent
Extremely Satisfied	10	34.5%
Very Satisfied	8	27.6%
Satisfied	8	27.6%
Very Unsatisfied	2	6.9%
Unsatisfied	1	3.4%

### 10. Sign-in process when you arrived at the event:



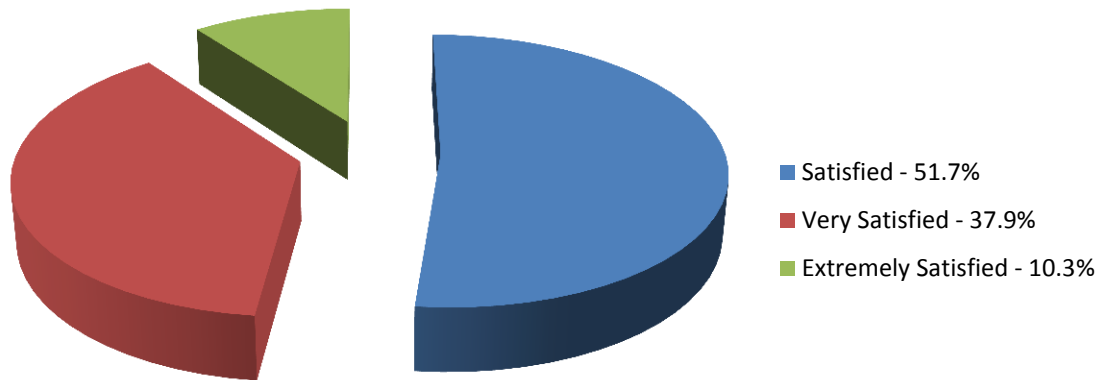
Value	Count	Percent
Extremely Satisfied	13	44.8%
Very Satisfied	13	44.8%
Satisfied	3	10.3%

### 11. Location (Holiday Inn, Allentown):



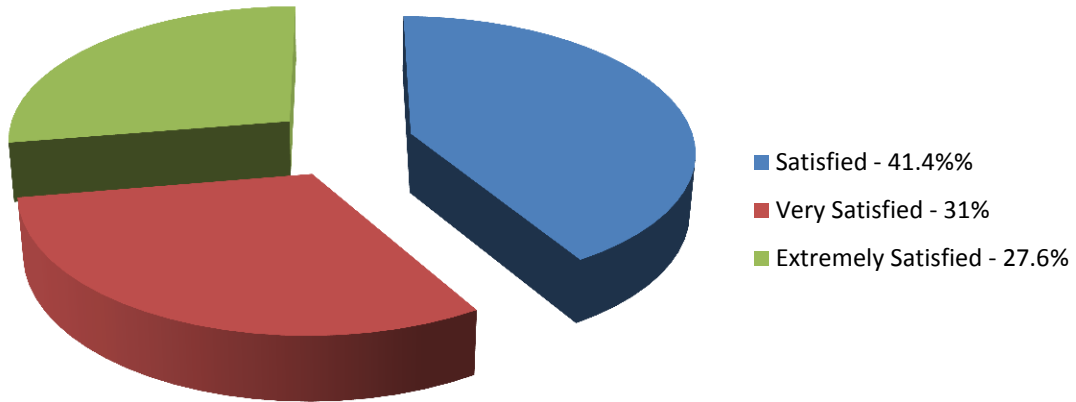
Value	Count	Percent
Very Satisfied	13	44.8%
Satisfied	10	34.5%
Extremely Satisfied	6	20.7%

## 12. Quality of Food (Holiday Inn, Allentown):



Value	Count	Percent
Satisfied	15	51.7%
Very Satisfied	11	37.9%
Extremely Satisfied	3	10.3%

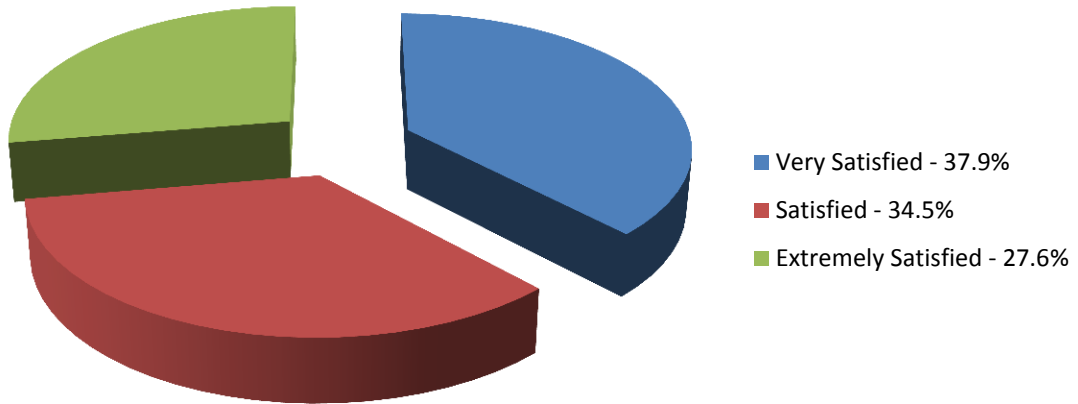
### 13. Starting Time of Summit (8:30 a.m.):



Value	Count	Percent
Satisfied	12	41.4%
Very Satisfied	9	31%
Extremely Satisfied	8	27.6%



### 14. Day of the Week (Thursday):



Value	Count	Percent
Very Satisfied	11	37.9%
Satisfied	10	34.5%
Extremely Satisfied	8	27.6%

**15. Please share any other comments you have and/or suggestions for future events:**

- I was hoping to have more "real world" information on fair housing. I found the panel discussion to be pointless, as the facilitator asked her own questions, which were too high level overview, and not enough nuts and bolts. She didn't even get through all the audience questions, which could have resulted in more helpful information. It should have been an open question and answer session with the panel and the audience, so the other audience members could have benefitted from some "real life" scenarios/questions. The other two sessions touch on some of these briefly, but not nearly as much as I would have liked or expected.
- Would like to have learned the proper way to answer various questions by clients to avoid violating the fair housing laws. Perhaps this could have been done with role playing between an agent and buyer/seller and then one of the experts identifying which rules were violated. Would like to learn more about commercial listings. The LVAR MLS has many commercial listings but very little education on representing buyers and sellers of commercial real estate.
- I felt the panelists (in the Expert Panel discussion) were uncomfortable in their roles and perhaps should have been better prepared for that particular format. The information provided may have been valid, however the discomfort exhibited by the panelists was distracting.
- Exiting the parking garage took over 30 minutes. perhaps more cashiers could be available in the future.
- I enjoyed the 2 CLE credits that I earned as an attorney and Mayor Palowski's remarks.
- I registered in advance, but when I arrived (admittedly, a bit late), I had to sit on the floor and I don't think I received all the materials either. Overall though, it was a very interesting conference- good topics and good discussions. I was engaged the entire time and never bored.
- Break-out session can answer. Went to session 2 The Lehigh Valley area has a lot more to learn about discrimination. They have old ways with old laws. Hopefully these Fair Housing classes and summit will help.



# NEWS

**For Immediate Release**

## **Lehigh Valley Association of REALTORS® Announces Lehigh Valley Fair Housing Summit**

### **Fair Housing Experts to Discuss Real World Challenges**

(Lehigh Valley, PA – April 14, 2014) – The Lehigh Valley Association of REALTORS® (LVAR) will host the Lehigh Valley Fair Housing Summit in partnership with North Penn Legal Services. The Summit, open to the public, will provide practical training for Realtors®, housing professionals and community leaders. Fair housing experts will discuss real world experiences with fair housing challenges to help attendees become more knowledgeable about compliance with fair housing laws.

The Fair Housing Summit will begin with an address by Jane Vincent, HUD Regional Administrator for Region III, the Mid-Atlantic region that includes Pennsylvania, Virginia, West Virginia, Maryland, Delaware and the District of Columbia. Vincent will report on the state of fair housing in the Lehigh Valley and beyond.

An expert panel has been formed to further discuss fair housing compliance. Moderator, Lori Sywensky, Northampton County Community Development Administrator will facilitate the discussion. Members of the panel include Melody Taylor-Blancher, HUD Region III Director Fair Housing and Equal Opportunity; Fred Underwood, Diversity Director, National Association of Realtors® (NAR); Christopher Reid, Esq., Board President Community Action Committee of the Lehigh Valley, Inc. (CACLV) and President of Northampton County Bar Association and Maurice Mohammad, President, Minority Real Estate Network of the Lehigh Valley.

“We are tapping the expertise of highly regarded and knowledgeable panelists to provide fair housing insight to attendees,” says Ryan Conrad, CEO of LVAR. “The Fair Housing Summit is designed to provide a thorough understanding and to enforce the importance of fair housing compliance.” Conrad adds.

James Berry, Executive Director and Megan Bolin, Outreach and Communications Coordinator of the Fair Housing Council of Suburban Philadelphia will provide an overview of fair housing enforcement and testing followed by a report on the testing conducted in the Lehigh Valley from 2011 through 2013.

(MORE)

Berry and Bolin will make recommendations to providers, advocates and communities to ensure total compliance with fair housing.

“We are pleased to be a partner in presenting the Lehigh Valley Fair Housing Summit,” says Victoria A. Coyle, Esq., Executive Director of North Penn Legal Services. “The Summit will feature information from diverse resources in government and private practice sectors.”

Attendees will have the option of participating in two sessions that will be held simultaneously. Patricia McGarvey-Knebels, Esq., HUD Trial Attorney, will present *Disability Discrimination in Property Management and Rentals*. McGarvey-Knebels will review reasonable accommodations and modifications for those with disabilities as well as issues concerning assistance animals.

Becky Bradley, Executive Director, Lehigh Valley Planning Commission, will present *Zoning: Obstacles to Fair Housing Compliance*. Bradley will give an overview of the Fair Housing Act as it relates to zoning including provisions in zoning ordinances that raise fair housing compliance issues and best practices in drafting/revising zoning ordinances.

“Our goal is ensure that attendees fully understand the Fair Housing Act and the importance of compliance in every aspect of daily living,” says Conrad.

The Lehigh Valley Fair Housing Summit will be held on April 24 from 8:30 am to 12:30 pm at the Holiday Inn, Center City Allentown. The Summit is eligible for 3.5 hours of continuing education credits for Realtors® and 2 substantive continuing legal education credits for attorneys. Tickets to the event are \$25. The registration deadline is April 18. For more information [LVAR.org/FairHousingSummit](http://LVAR.org/FairHousingSummit),

**About Lehigh Valley Association of REALTORS®** Lehigh Valley Association of REALTORS® is a not-for-profit trade association that provides professional development and training resources, competitive market information, legislative advocacy, a peer review and mediation process for members, and a dispute resolution service for consumers. LVAR owns and operates the Lehigh Valley Multiple Listing Service (MLS), the Lehigh Valley Real Estate Academy, and is publisher of Lehigh Valley Real Estate Weekly. Members of LVAR pledge to uphold the National Association of REALTORS® code of ethics, a criterion of excellence and professional conduct. For more information, visit: [www.LVAR.org](http://www.LVAR.org).

###

Contact: Kelly Gould, Kelly Gould & Company, Phone: 610-390-1988, [kgould@kellygouldco.com](mailto:kgould@kellygouldco.com)

# Regional Analysis of Impediments to Fair Housing Choice

---

Lehigh Valley, Pennsylvania

September, 2014

Prepared for  
Lehigh Valley Economic Development Corporation

By



## Lehigh County Impediments and Recommendations

---

### **Impediment #1: Disparities in Mortgage Lending**

According to 2011 Home Mortgage Disclosure Act (HMDA) data, and after controlling for income level, Whites had the lowest mortgage denial rates in every income tier. In fact, low income Whites had a lower rate of mortgage denial than minorities of moderate and even high income levels. Blacks were denied loans at rates which increased with income: 28.1% for low income, 32.4% for moderate, and 34.5% at the higher income bracket. Moderate income Hispanics were denied loans at higher rates than those with low or high incomes. Denial rates for Asians were lower than for other minority groups but still much higher than Whites. Pacific Islanders had the highest denial rates of any group at all income levels. The presence of disparities alone is not evidence enough to prove outright discrimination (there may be legitimate factors such as credit score, job history, and collateral that result in these loan denial patterns) but they do have the effect of limiting the housing choice of would-be borrowers.

Recommendation: The strong patterns of disparity in the HMDA data, though possibly attributable to legitimate factors, should be studied further to determine whether discrimination is taking place in the lending sector. Under the HMDA, lenders are not required to report the reasons mortgage applications are denied. In the data used for this analysis, a reason for denial was listed for only 13.1% of the records. Specifically, fair housing testing of the mortgage market is recommended. As with the testing that revealed steering among real estate agents (and subsequent collaborative education efforts between the City of Allentown, CACLV, and real estate agents), similar studies can be designed to evaluate mortgage lending. Combined with testing, a plan for collaborative education of mortgage lenders should be developed and implemented to ensure lenders are knowledgeable of their responsibilities under the Fair Housing Act.

### **Impediment #2: Need for Increased Fair Housing Education**

The Lehigh Valley Fair Housing Project, undertaken by North Penn Legal Services, is roundly praised for its success at organizing events and sustaining education campaigns, including bus advertising. The project receives funding from each of the five local CDBG entitlement communities and is therefore a testament to the cooperative posture of these jurisdictions when it comes to fair housing education. As helpful as these efforts are, numerous indicators point to the need to do even more. In the fair housing survey conducted as part of this analysis, 46.3% of respondents claimed they did not know their fair housing rights; another 32.5% knew them “somewhat”, leaving barely one in five residents aware of the protections afforded them by fair housing law. More than two-thirds of survey respondents stated they did not know where to file a fair housing complaint. Increased education is also needed for landlords and property owners. Of those respondents to the survey believing they had been discriminated against, 71.4% said the discrimination had been perpetrated by a landlord or property owner. Also underscoring this need is the *Newell v. Traditions of Hanover*

lawsuit where a property manager (responsible for multiple senior living facilities throughout Pennsylvania) is alleged to have discriminated against prospective tenants with disabilities.

Recommendation: To address the need for increased public education relative to fair housing, it is recommended that the Lehigh Valley Fair Housing Project between North Penn Legal Services and the five CDBG entitlement communities be sustained and either expanded or complemented so that it reaches even more people. Advertising campaigns should make clear how to recognize discrimination and where one should begin if he or she has experienced discrimination. The Project should develop a specific strategy describing how Lehigh Valley landlords and property managers will be reached and the model should include proactive measures that take the necessary information to the subjects. A similar emphasis should be placed on educating racial and ethnic minorities and people with disabilities, as these were the most common bases for housing discrimination complaints in the region. A public survey similar to the one conducted as part of this analysis should be conducted in 2015 to determine the effect of these increased education efforts.

The jurisdictions will continue to coordinate the regional working group about fair housing and work with local contractor North Penn Legal Services to continue to provide outreach to residents about fair housing rights and pursue other vendors as needed. This work will include:

- Providing assistance to at least 60 residents annually to resolve potential fair housing violations.
- Educate 500 representatives of area non-profit and advocacy organizations annually on fair housing rights and recourses.
- Disseminate 800 copies of, “The Right Stuff About Renting,” to provide tenants information about their rights, including those under fair housing laws.
- In conjunction with LVAR, provide six training sessions annually to Realtors.
- Offer outreach sessions and other educational opportunities to promote Fair Housing Awareness Month. Activities will use local media to increase awareness about fair housing issues throughout the Lehigh Valley.

### **Impediment #3: Need for Increased Coordination among Fair Housing Providers**

The five entitlement communities participate in a fair housing partnership with North Penn Legal Services, which representatives roundly praise and see as having been successful. This partnership consolidates the fair housing work that otherwise would have been carried out by city and county staff in the five different jurisdictions. However, some other fair housing providers with a presence in the Lehigh Valley, particularly the various local human relations commissions, are not well integrated into this partnership. Local human relations commissions exist in Allentown, Bethlehem,

and Easton, but their role is unclear and their effectiveness is varied, some depending completely on volunteer staffing. The efforts of these organizations are generally not concerted.

Recommendation: Through the North Penn Legal Services project, education regarding fair housing has been enhanced, but investment in local fair housing enforcement and compliance capacity is needed as well. Lehigh Valley's entitlement communities should take the lead in working toward increased coordination among the region's fair housing organizations by convening representatives of the organizations for the purpose of coordinating the roles and responsibilities of each organization in fair housing education, testing, and enforcement. Representatives of these organizations should meet periodically to update one another on their activities and to review and reevaluate the coordination strategy as needed.

#### **Impediment #4: Zoning Provisions Impacting People with Disabilities**

Zoning ordinances adopted by Lehigh Valley municipalities pose varying levels of risk related to limitations of housing choice and/or discrimination against people with disabilities. Great variation exists among the zoning codes within the Lehigh Valley. Some of these codes make it unreasonably difficult for persons with disabilities to make reasonable modifications to their property, restrict group homes from residential districts or require special permitting from them, require public hearings be held before permitting new group homes, and restrict placement of group homes based on their requirements for onsite supportive services. Because each municipality's ordinance is unique and because the ordinances vary in the levels of compliance with fair housing law, it is difficult to draw conclusions for the region. Additional analysis is necessary to determine the extent of possible non-compliance related to zoning provisions affecting persons with disabilities.

Recommendation: Appropriate officials in the Lehigh Valley's five CDBG entitlement communities (Lehigh County, Northampton County, and the Cities of Allentown, Bethlehem, and Easton) will work with the Lehigh Valley Planning Commission to develop and promote a model ordinance for inclusionary zoning by December 2015. Furthermore, the counties will provide technical assistance to 75% of municipalities to update zoning ordinances in accordance with the model fair housing ordinance.

Furthermore the entitlement communities will work with the Lehigh Valley Center for Independent Living to ensure that housing needs are met for residents with disabilities through support of its PLACE program and landlord education program.

In conjunction with the LVPC, the entitlements will target to educate a total of 40 local municipal officers, zoning officials and housing developers annually on inclusionary zoning.



### **Impediment #5: Zoning Provisions Restricting Residential Uses From Residential Districts**

The zoning analyses conducted as part of this document brought attention to a number of Lehigh Valley municipalities, in both Lehigh County and Northampton County, that restrict inherently residential land uses (such as group homes, shelters, or treatment facilities of a residential nature) from some residential zones. Municipalities may have certain zoning districts of various intensities featuring either a significant or exclusive concentration of residential uses. Depending on the municipality, these districts generally take one of two forms: a single-use residential district or a mixed-use district of residential uses and complimentary uses of other types. Under federal law (e.g. the Fair Housing Act and the Americans with Disabilities Act), zoning provisions may not isolate residential uses addressing the needs of a protected class from other residential uses due to the characteristics of their clientele. Such uses seek to keep their clients integrated with the community, and municipal zoning ordinances may not nullify this intent.

Recommendation: Appropriate officials in the Lehigh Valley's five CDBG entitlement communities (Lehigh County, Northampton County, and the Cities of Allentown, Bethlehem, and Easton) will work with the Lehigh Valley Planning Commission to develop and promote a model ordinance for inclusionary zoning by December 2015. Further, the counties will provide technical assistance to municipalities as needed to ensure that the inherently residential land uses (such as group homes, shelters, or treatment facilities of a residential nature) are included in residential zones. In conjunction with the LVPC, the entitlement communities will work with local municipal officers, zoning officials and housing developers annually on inclusionary zoning.

### **Impediment #6: Condition of Affordable Housing Stock**

The Lehigh Valley is fortunate to have an ample supply of affordable housing. Especially when compared with the large surrounding cities like Philadelphia and New York, the relatively low cost of housing in the Lehigh Valley stands out. Though the region's housing stock tends to be relatively affordable, it also tends to be old (over 50% was built prior to 1970), inaccessible to people with disabilities, expensive to maintain, and prone to falling into substandard condition. Over 5% of Lehigh Valley homeowners *without a mortgage* spend more than 30% of their income on housing expenses, reflecting high utility and maintenance costs, likely tied to the age of the housing stock. Stakeholders interviewed in the course of this analysis often referred to substandard conditions in the most affordable housing; several described problems with slumlords in their communities.

Recommendation: The five entitlement communities should continue to concentrate affordable housing funds, to the degree practicable, on rehabilitation that increases the quality of existing housing units. Stakeholders have described several recent rehabilitation and de-conversion projects as evidence that substandard properties can be rehabilitated and successfully returned to the rental market as affordable housing. Homeowner rehabilitation programs should be a funding priority to assist homeowners with the costs of renovating and modernizing their homes as a strategy for lowering owner costs over time. Finally, programs that fund accessibility features and retrofits for people with disabilities should be considered for funding.

### **Impediment #7: Public Perceptions Regarding Transportation Connectivity**

LANta, the Lehigh Valley's public transportation system, does an admirable job of networking the community given the region's three urban hubs and large rural areas. Concepts such as the Alburtis/Macungie Flex Zone are expanding LANta's services in a careful, cost-controlled manner. In the fair housing survey conducted as part of this analysis, a remarkable 73.1% of respondents said that public transportation was available in their neighborhood. However, only 45.5% said that public transportation provided access to major employers, and only 23.1% believed that LANta service schedules coincided with their work schedules. It is worth noting that 22.8% of respondents did not know whether public transportation was available to major employers and 47% did not know whether transit scheduled coincided with their work schedules. If the public is not aware of the transit options available to make connections between their homes, workplaces, and other destinations, they will be limited in the neighborhoods they consider living in, and the places they may consider working. Enhanced knowledge of transit availability and connectivity can potentially open new areas of opportunity (and additional housing choices) to protected classes.

Recommendation: Actual transit connections and options in Lehigh Valley appear to be stronger than residents realize, indicating that LANta may need to do more to advertise its routes and schedules. The public perception regarding transit connectivity should be incorporated into LANta's ongoing planning processes. Existing LANta marketing plans should continue to be supported by the region's municipalities and implemented by LANta staff. The Lehigh Valley Economic Development Corporation should continue its efforts to involve the region's employers in discussions with LANta regarding routes and schedules advantageous to their respective employees. The five entitlement communities should continually review LANta and Lehigh Valley Planning Commission studies and planning documents (such as the Comprehensive Plan and the Moving LANta Forward Study) for opportunities to advocate transportation infrastructure improvements that align with the goal of expanding housing choice.

**CR-65 – Citizen Participation**

The following pages include the public display notices and any public or written comments received by the County.

# Proof of Publication Notice in The Morning Call

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

STATE OF PENNSYLVANIA }  
COUNTY OF LEHIGH } ss:

COPY OF NOTICE OR ADVERTISEMENT

Sharon A. Repsher, Manager of Billing and Collections of THE

MORNING CALL, LLC, of the County and State aforesaid, being duly sworn, deposes and says that THE MORNING CALL is a newspaper of general circulation as defined by the aforesaid Act, whose place of business is 101 North Sixth Street, City of Allentown, County and State aforesaid, and that the said newspaper was established in 1888 since which date THE MORNING CALL has been regularly issued in said County, and that the printed notice or advertisement attached hereto is exactly the same as was printed and published in regular editions and issues of the said THE MORNING CALL on the following dates, viz.:

..... and the 13th day of December 2014.....

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

*Sharon A. Repsher*  
.....  
Designated Agent, THE MORNING CALL, LLC

SWORN to and subscribed before me this 15th day of December 2014.....

*[Signature]*  
.....  
Notary Public

COMMONWEALTH OF PENNSYLVANIA  
Notarial Seal  
Joanne Reiss, Notary Public  
City of Allentown, Lehigh County  
My Commission Expires Nov. 22, 2015  
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

THE MORNING CALL, LLC, publisher of THE MORNING CALL, a newspaper of general circulation, aforesaid notice and publication costs and certifies that the same have been duly paid.

Record # 39845

LEHIGH COUNTY, PA  
COMMUNITY DEVELOPMENT  
BLOCK GRANT (CDBG)  
PROGRAM

FY 2013 CONSOLIDATED ANNUAL  
PERFORMANCE  
AND EVALUATION REPORT  
(CAPER)

Notice is hereby given that Lehigh County intends to submit its FY 2013 Consolidated Annual Performance and Evaluation Report (CAPER) to the U.S. Department of Housing and Urban Development on or before December 30, 2014.

In accordance with Title I of the National Affordable Housing Act of 1990, as amended, Lehigh County has prepared its Fiscal Year 2013 Consolidated Annual Performance and Evaluation Report (CAPER) for its Community Development Block Grant (CDBG) Program. This report describes the level of housing assistance and other community development activities designed to benefit low- and moderate-income persons and households in Lehigh County through various federal funding programs during the Program Year October 1, 2013 through September 30, 2014.

Copies of the FY 2013 CAPER are available for public inspection at the following locations in Lehigh County, as well as on the Lehigh County website <http://www.LehighCounty.org> beginning December 15, 2014 through December 29, 2014:

- 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

PUBLISHED BY THE MORNING CALL, LLC, PUBLISHERS OF THE MORNING CALL, LEHIGH COUNTY, PA. PUBLICATION COSTS

All interested persons are encouraged to review the FY 2013 CAPER. Written comments may be addressed to Ms. Paulette Gilfoil, CDBG Program Coordinator, Government Center, 17 South Seventh Street, Allentown, PA 18101, or by email at [paulettgilfoil@lehighcounty.org](mailto:paulettgilfoil@lehighcounty.org). Oral comments may be made by calling (610) 782-3566. All comments on the CAPER will be considered until December 29, 2014.  
Paulette Gilfoil  
CDBG Program Coordinator,  
Lehigh County  
#2901020 — December 13, 2014

**LEHIGH COUNTY, PA  
COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM**

**FY 2013 CONSOLIDATED ANNUAL PERFORMANCE  
AND EVALUATION REPORT (CAPER)**

Notice is hereby given that Lehigh County intends to submit its FY 2013 Consolidated Annual Performance and Evaluation Report (CAPER) to the U.S. Department of Housing and Urban Development on or before December 30, 2014.

In accordance with Title I of the National Affordable Housing Act of 1990, as amended, Lehigh County has prepared its Fiscal Year 2013 Consolidated Annual Performance and Evaluation Report (CAPER) for its Community Development Block Grant (CDBG) Program. This report describes the level of housing assistance and other community development activities designed to benefit low- and moderate-income persons and households in Lehigh County through various federal funding programs during the Program Year October 1, 2013 through September 30, 2014.

Copies of the FY 2013 CAPER are available for public inspection at the following locations in Lehigh County, as well as on the Lehigh County website <http://www.LehighCounty.org> beginning December 15, 2014 through December 29, 2014:

- **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

All interested persons are encouraged to review the FY 2013 CAPER. Written comments may be addressed to Ms. Paulette Gilfoil, CDBG Program Coordinator, Government Center, 17 South Seventh Street, Allentown, PA 18101, or by email at [paulettegilfoil@lehighcounty.org](mailto:paulettegilfoil@lehighcounty.org). Oral comments may be made by calling (610) 782-3566. All comments on the CAPER will be considered until December 29, 2014.

Paulette Gilfoil  
CDBG Program Coordinator, Lehigh County