
LEHIGH COUNTY, PENNSYLVANIA

DEPARTMENT OF COMMUNITY & ECONOMIC DEVELOPMENT

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

FY 2024-2028 Five Year Consolidated Plan & FY 2024 Annual Action Plan

August 15, 2024

*In Accordance with the HUD Guidelines for the
Community Development Block Grant (CDBG) and
HOME Investment Partnerships (HOME) Programs*

Frank Kane, Director
Department of Community and
Economic Development



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Executive Summary

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

1. Introduction

Lehigh County, Pennsylvania is an entitlement community under the U.S. Department of Housing & Urban Development's (HUD) Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) Programs. In compliance with the HUD regulations, Lehigh County has prepared this FY 2024-2028 Five Year Consolidated Plan for the period of October 1, 2024 through September 30, 2028. This consolidated plan is a strategic plan for the implementation of the County's Federal Programs for housing, community, and economic development within Lehigh County.

Lehigh County has established the following FY 2024-2028 Five Year Consolidated Plan Priority Needs for the next five (5) year period:

- Housing Priority (HS);
- Homeless Priority (HO);
- Other Special Needs Priority (SN);
- Community Development Priority (CD);
- Economic Development Priority (ED); and
- Administration, Management, and Planning Priority (AMP).

The Five Year Consolidated Plan establishes the County's goals for the next five (5) year period and outlines the specific initiatives the County will undertake to address its needs and objectives by promoting:

- the rehabilitation and construction of decent, safe, and sanitary housing;
- creating a suitable living environment;
- removing slums and blighting conditions;

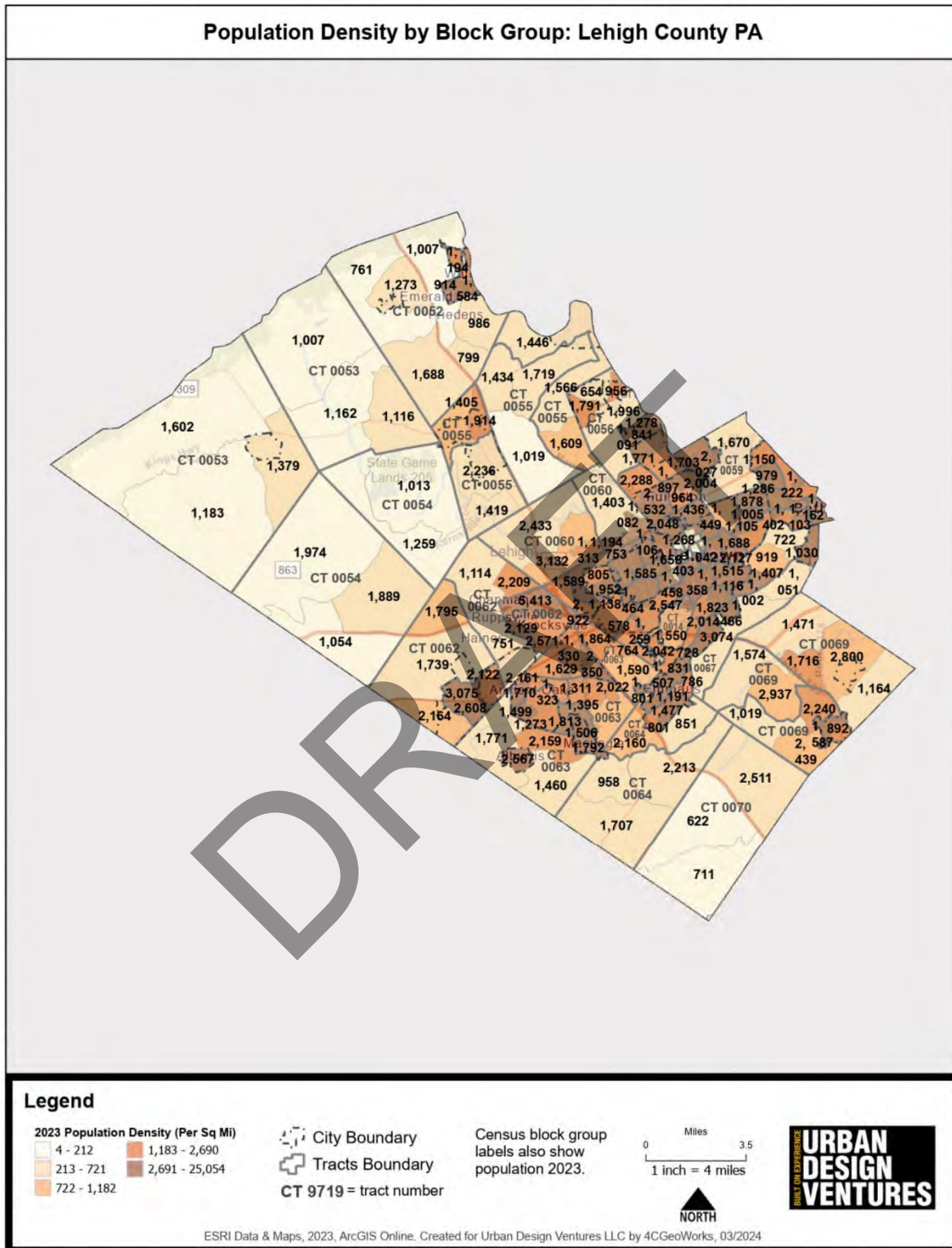
- promoting fair housing;
- improving public services;
- expanding economic opportunities; and
- principally benefiting low- and moderate-income persons.

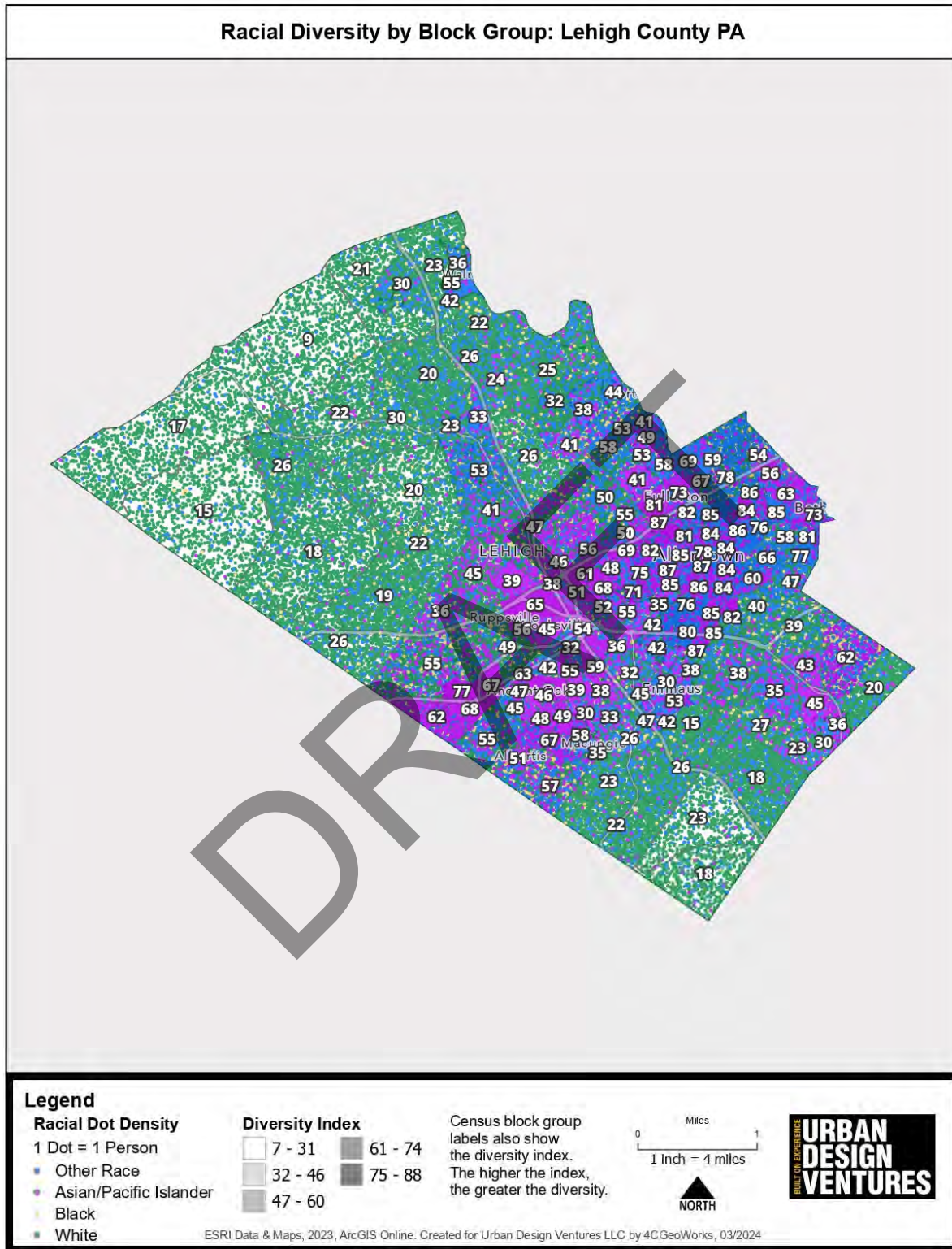
This Five Year Consolidated Plan is a collaborative effort of Lehigh County, the community at large, social service agencies, housing providers, advocates, planning agencies, community development and economic development groups. The planning process was accomplished through a series of public meetings,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

Maps:

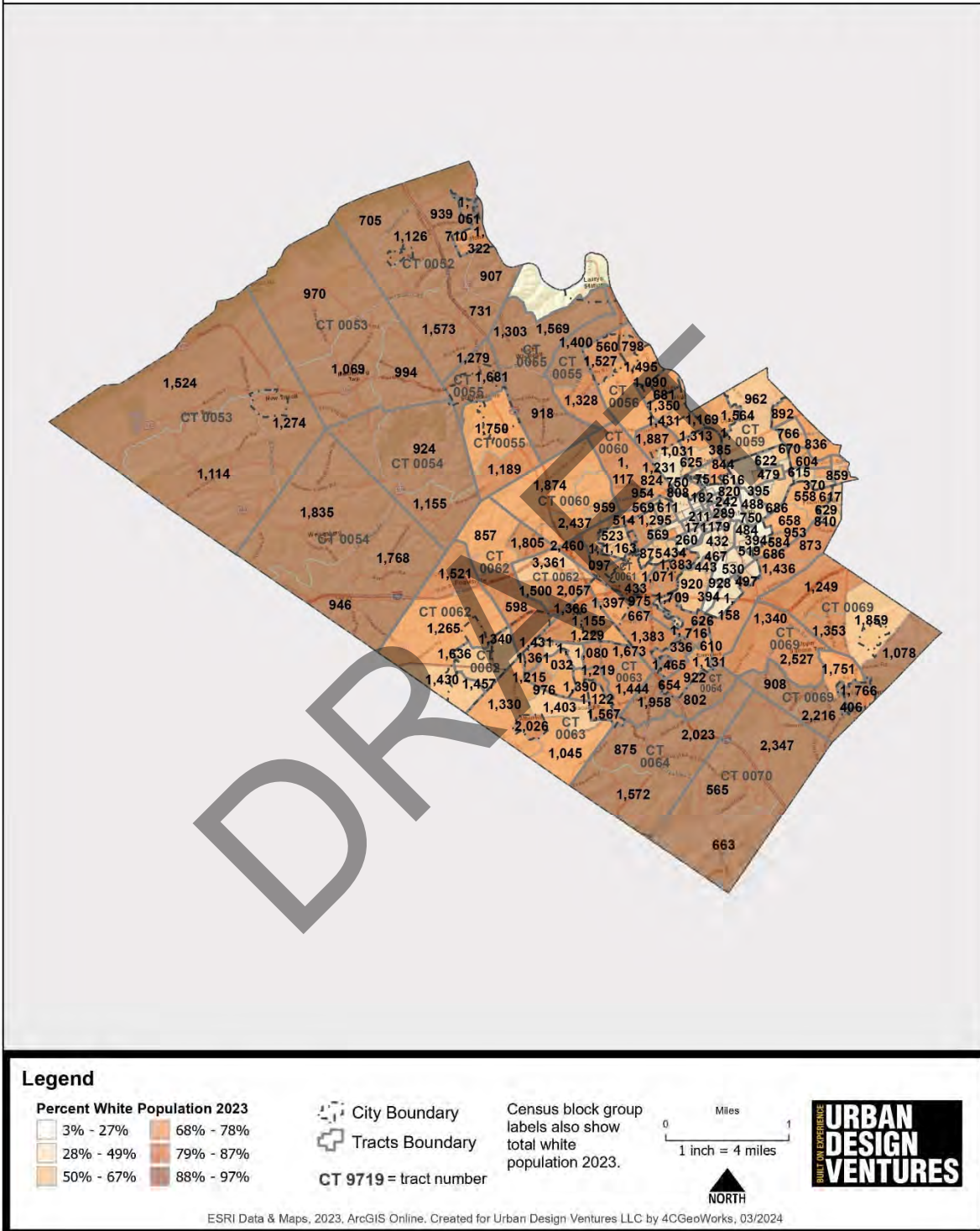
The following maps illustrate the demographic characteristics of the Lehigh County:

- Population Density by Block Group
- Racial Diversity by Block Group
- Percent White Population by Block Group
- Percent Minority Population by Block Group
- Percent Hispanic Population by Block Group
- Percent Population Age 65 and Over by Block Group
- Housing Units by Block Group
- Percent Owner-Occupied Housing Units by Block Group
- Percent Renter-Occupied Housing Units by Block Group
- Percent Vacant Housing Units by Block Group
- Low/Moderate Income Percentage by Block Group
- Low/Moderate Income Percentage by Block Group with Minority Population Overlay
- Commercial Hot Spots

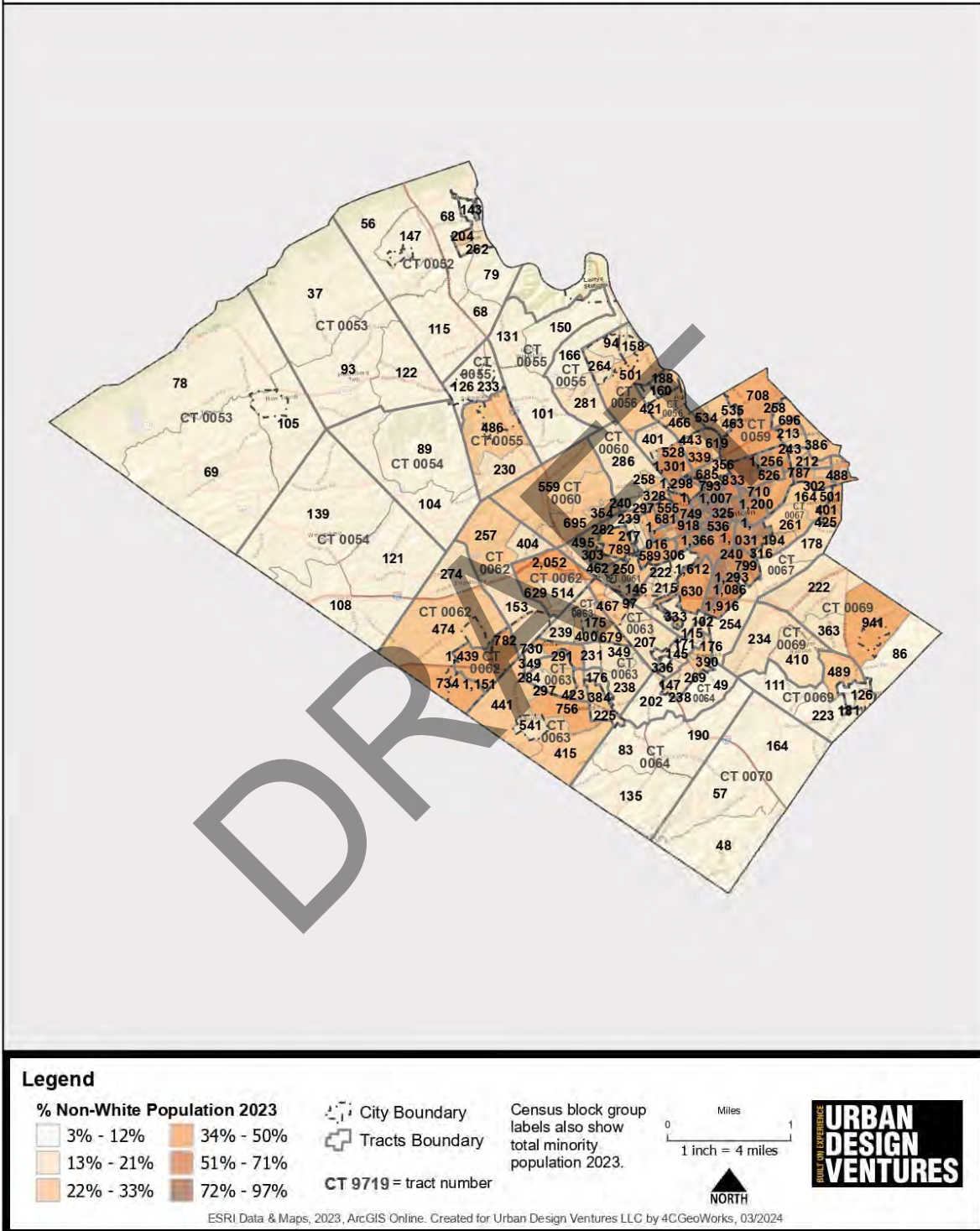


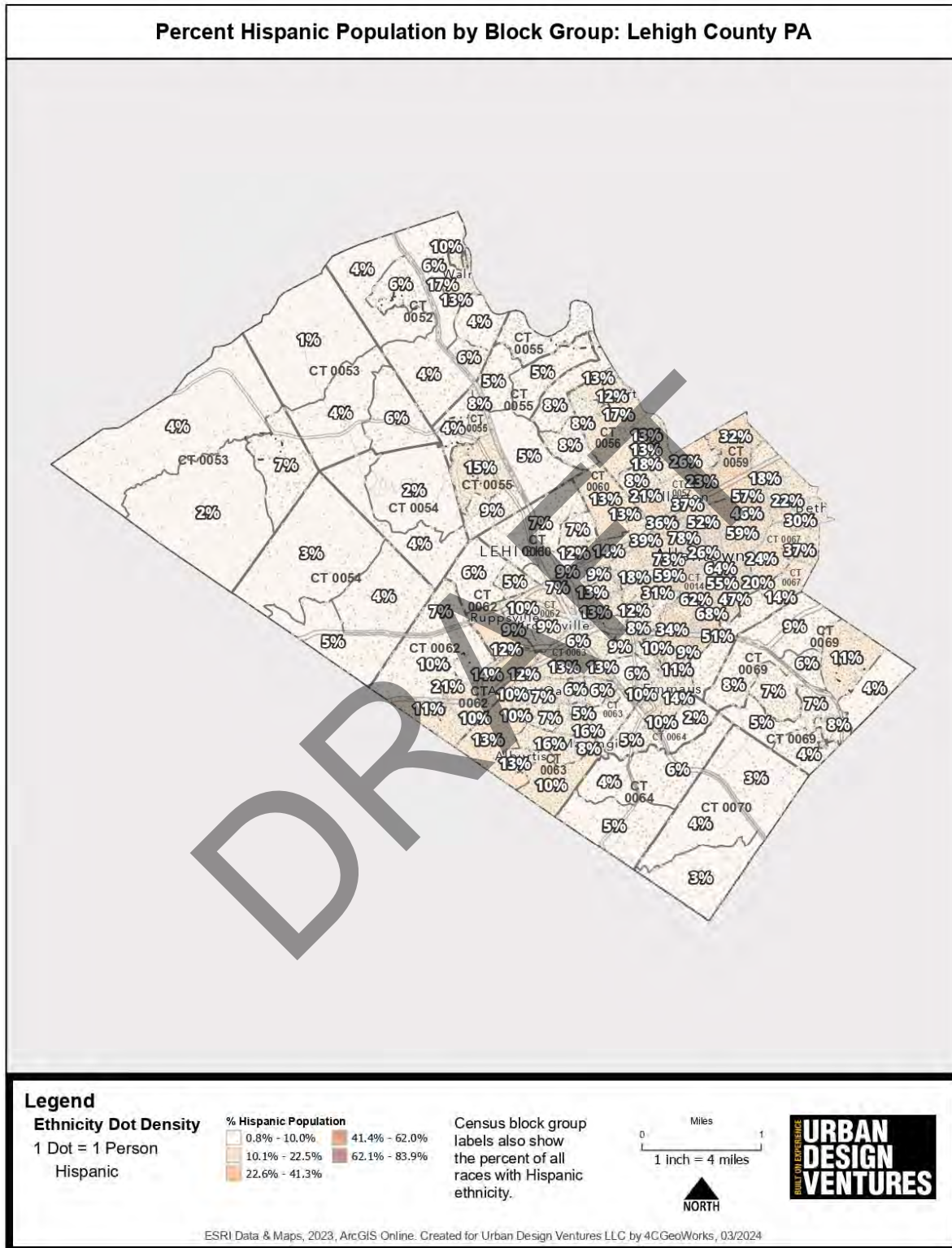


Percent White Population by Census Block Group: Lehigh County PA

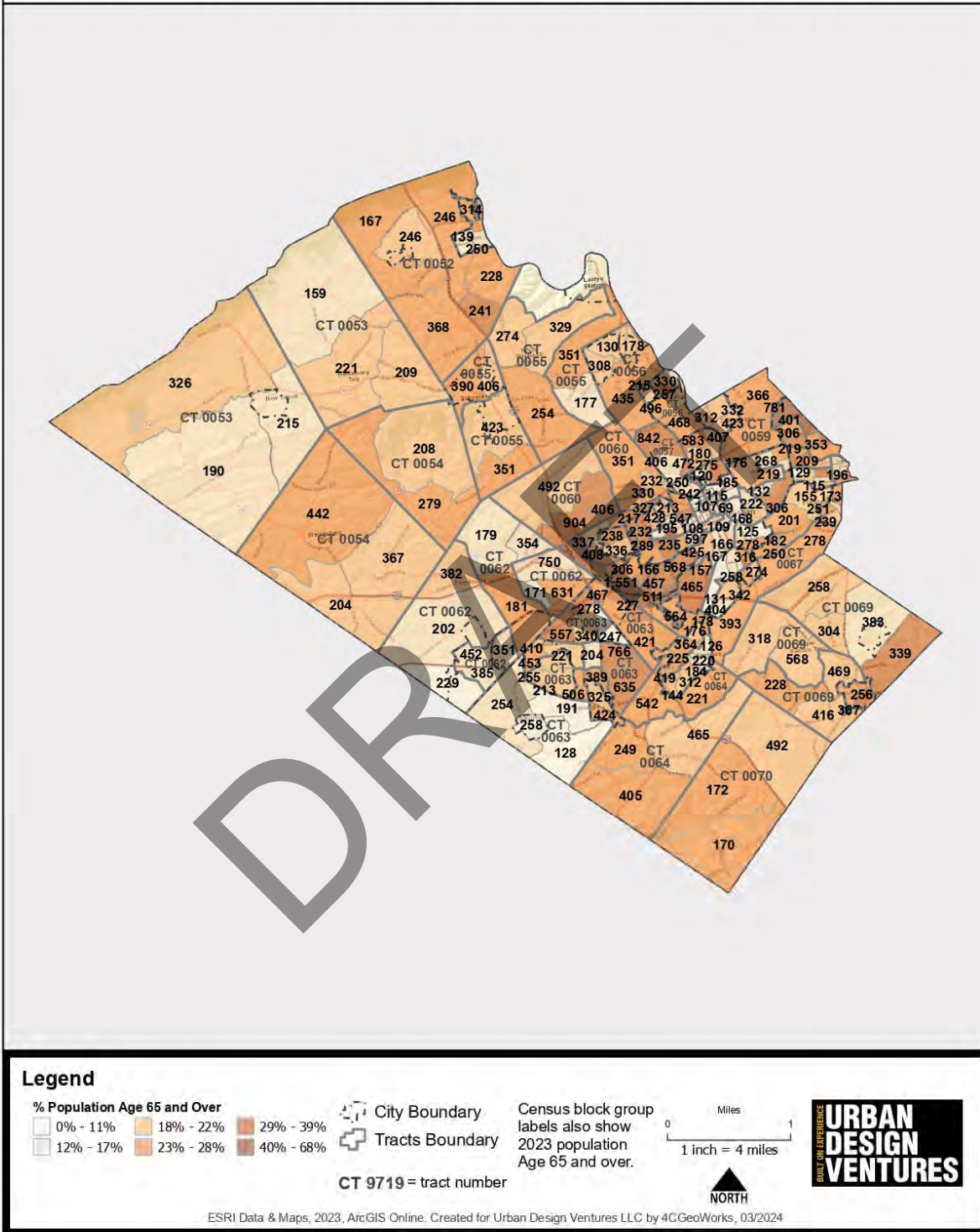


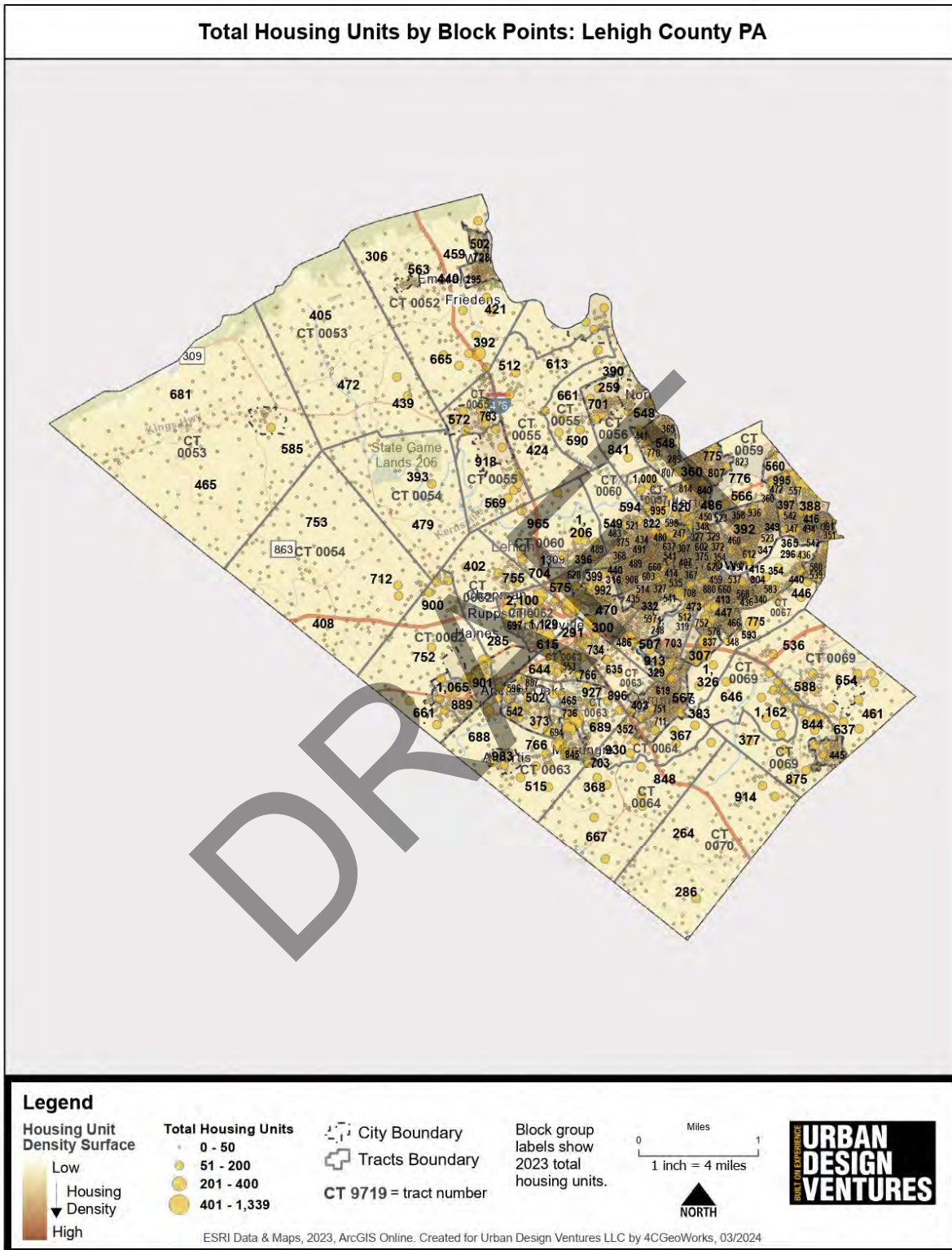
Percent Minority Population by Block Group: Lehigh County PA

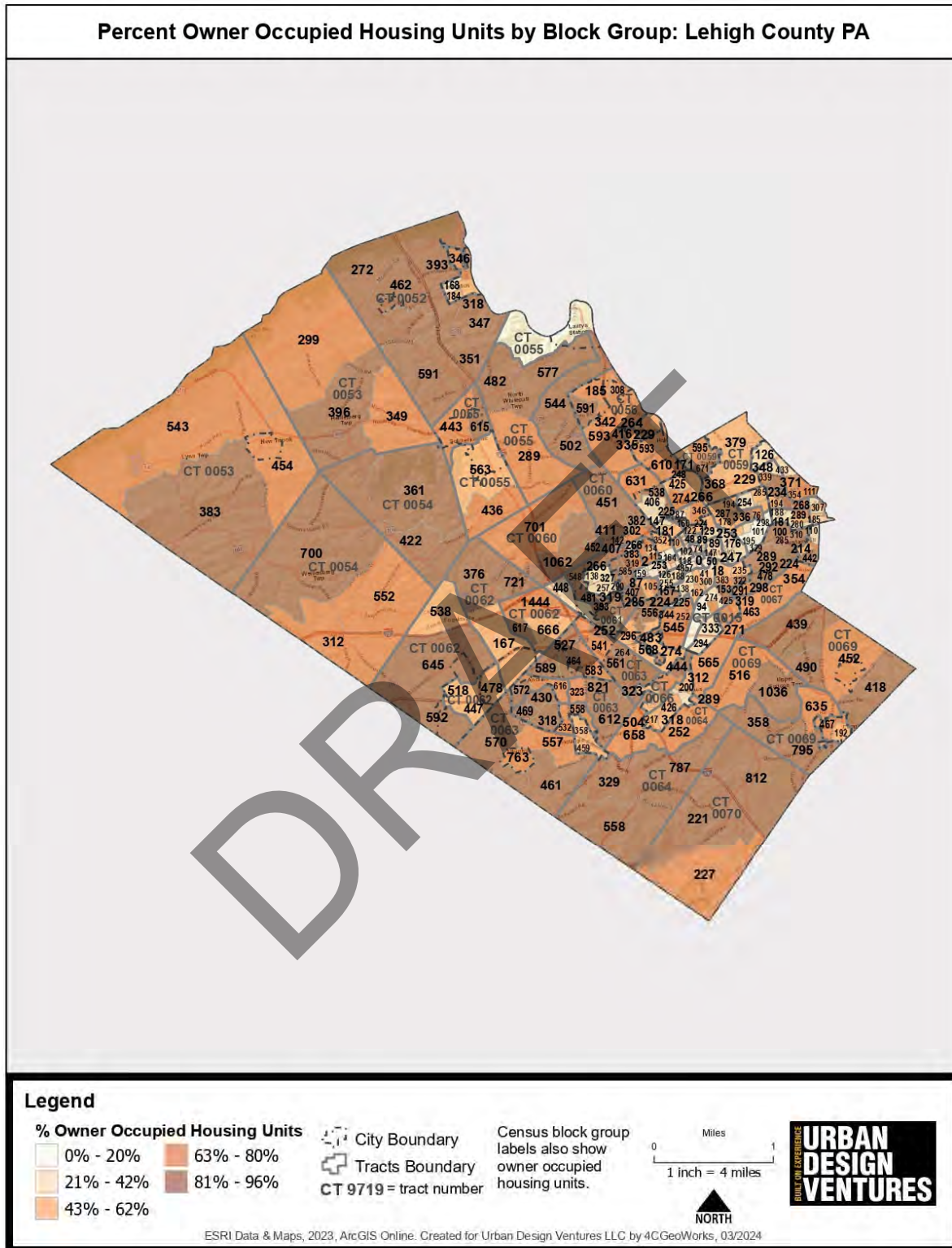


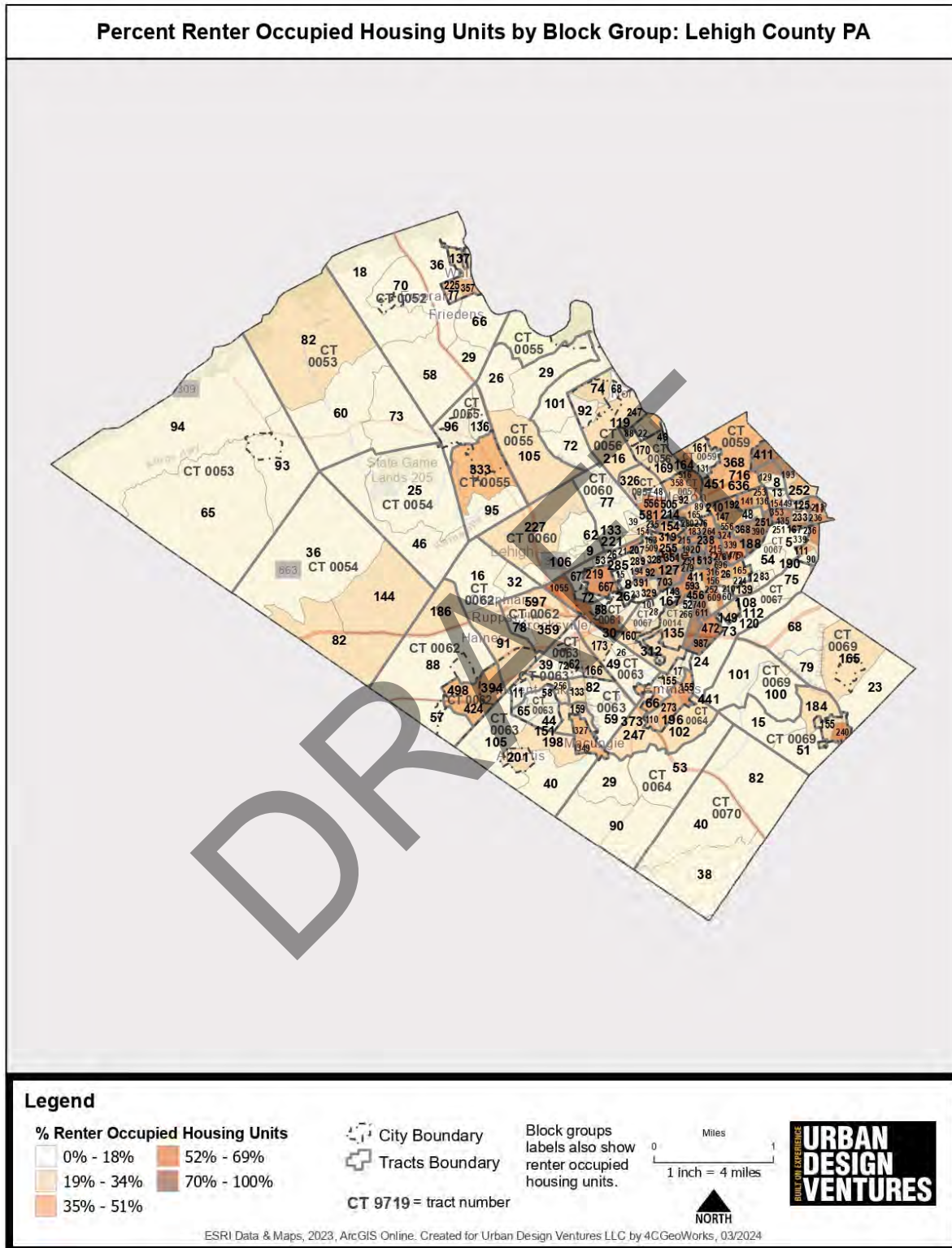


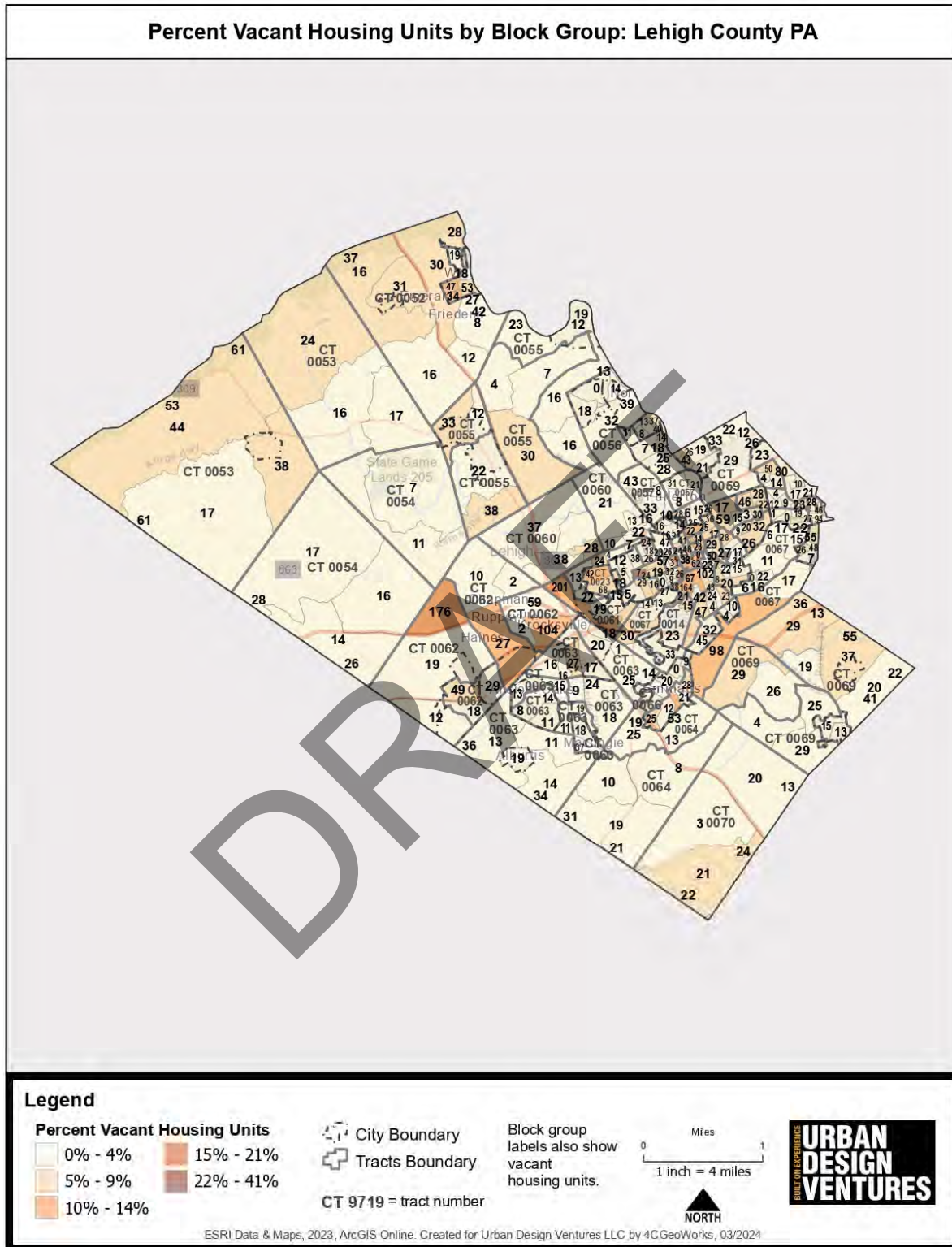
Percent Population Age 65 and Over by Block Group: Lehigh County PA

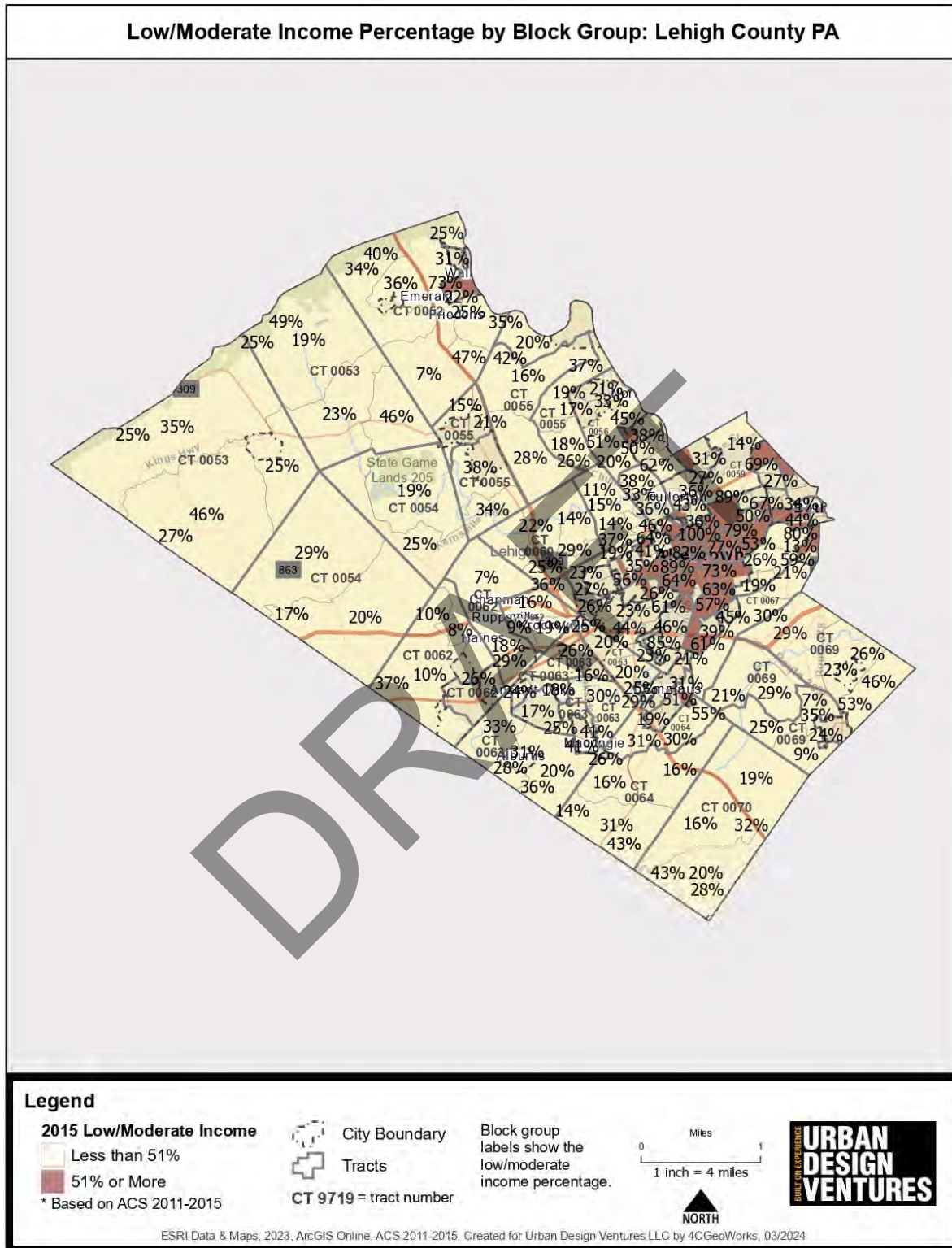


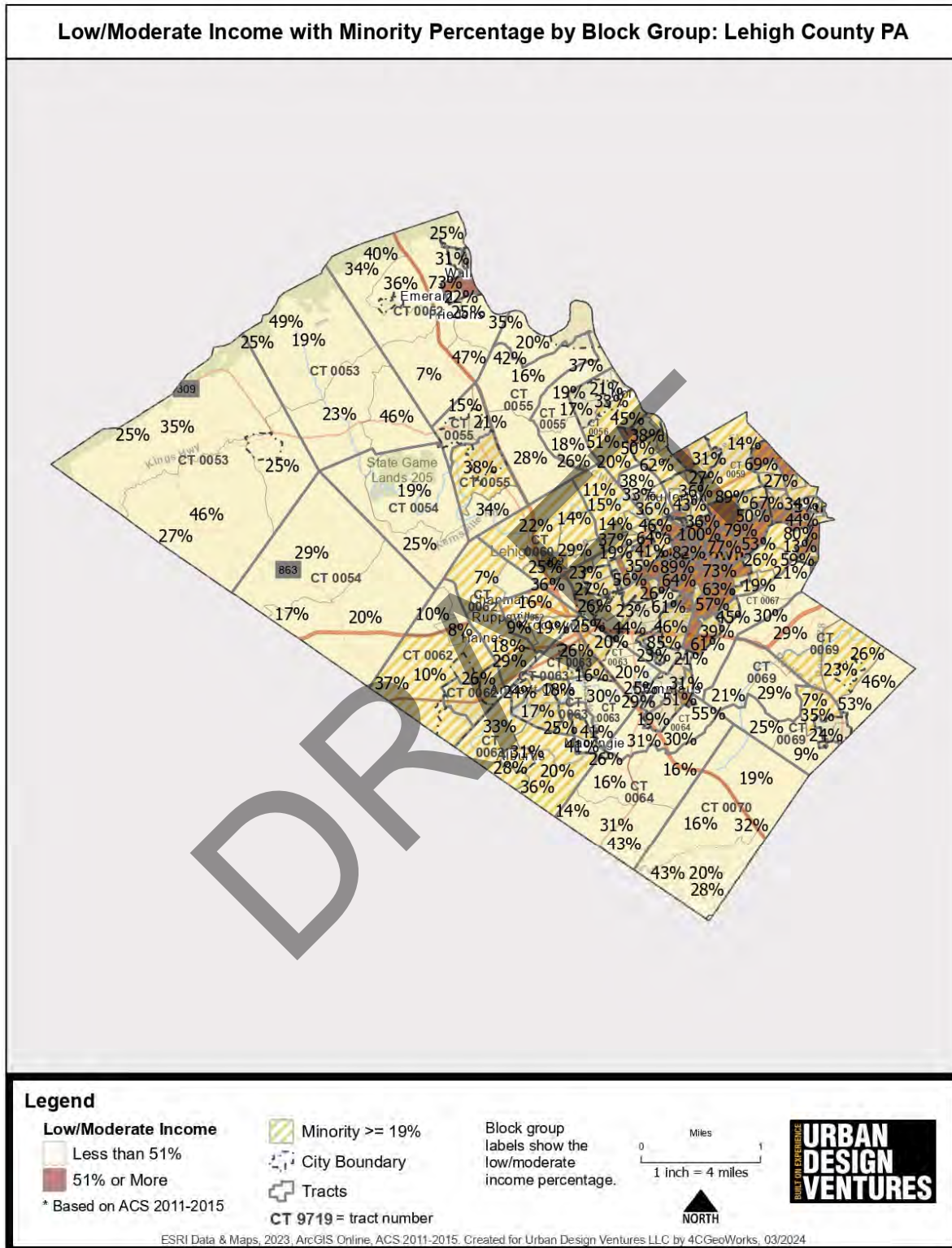


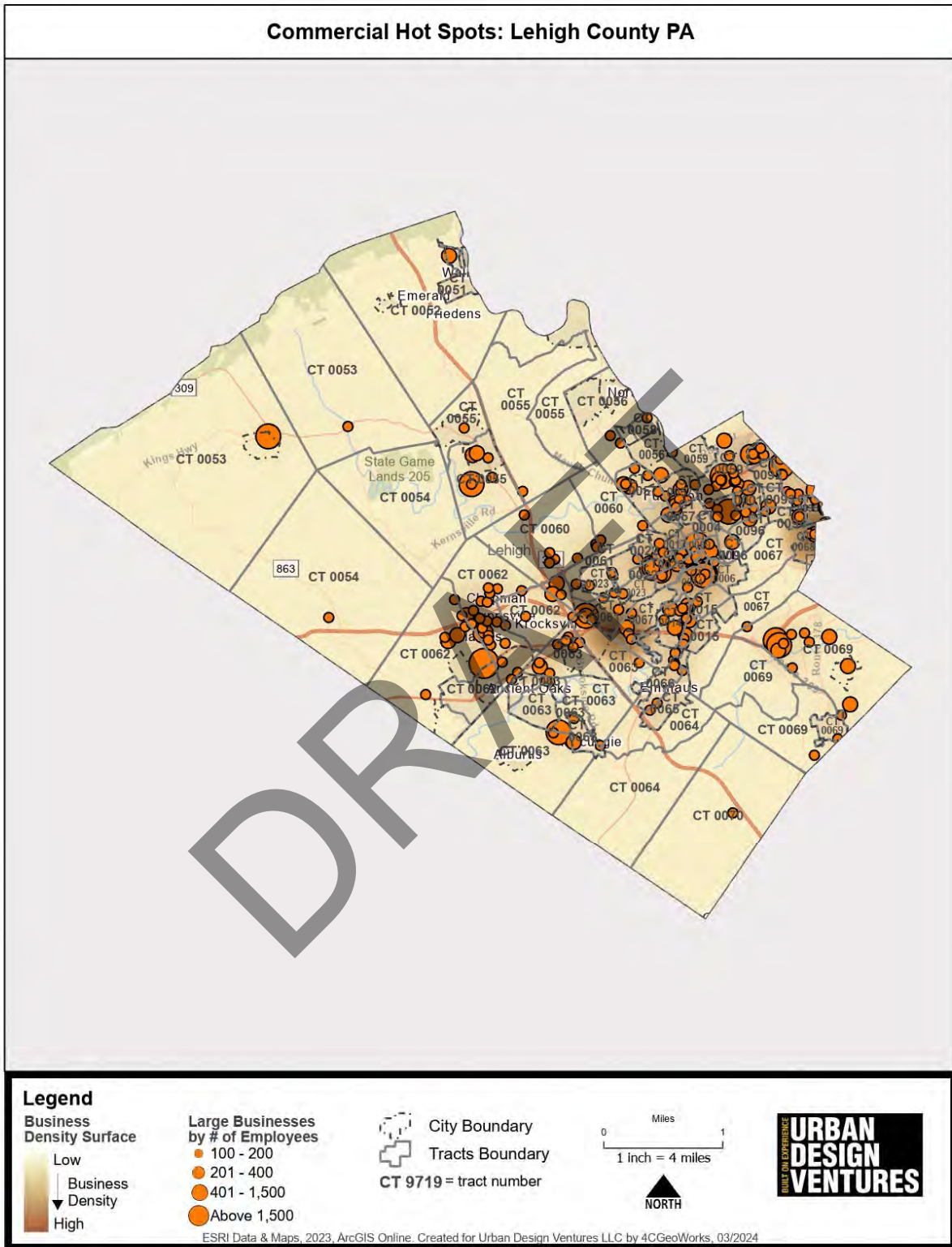












2. Summary of the objectives and outcomes identified in the Plan Needs Assessment

Overview

The "Vision" of this Five Year Consolidated Plan is to serve as a consolidated planning document, an application, and a strategic plan for Lehigh County. As part of the Five Year Consolidated Plan, the community must develop priorities needs and goals. The following priorities needs and goals have been identified for Lehigh County for the period of FY 2024 through FY 2028 for the Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) Programs:

HOUSING PRIORITY - HS

Need:

The County has been experiencing a growth in population and an influx of lower income persons which has created a shortage in housing, especially affordable housing.

Goal:

Goals to address this priority:

- **HS-1 Housing Development** – Increase the number of decent, safe, sanitary, accessible, and affordable housing units in the County, both for owner-occupied and rental-occupied housing.
- **HS-2 Homeownership** – Increase the opportunities for homeownership for low- and moderate-income households through downpayment/closing cost assistance, and housing counseling services.
- **HS-3 Housing Rehabilitation** – Promote and assist in the preservation of existing owner-occupied and renter-occupied housing stock in the County.
- **HS-4 Rent and Utility Assistance** – Promote housing stability through rental assistance, utility payments, and deposits for low- and moderate-income tenants who are at risk of becoming homeless.
- **HS-5 Fair Housing** – Affirmatively further fair housing by promoting and informing households on their rights and educating landlords, realtors, mortgage companies, sellers, etc. on fair housing practices which will reduce discrimination in housing.
- **HS-6 Housing Supportive Services** – Promote and assist low- and moderate-income households to locate and/or remain in affordable housing through housing counseling and supportive services.

HOMELESS PRIORITY - HO**Need:**

The County is situated at the crossroads of major highways and the expanding metropolitan area of the East Coast which has brought an influx of homeless and at risk of homelessness persons into the area.

Goal:

Goals to address this priority:

- **HO-1 Housing Opportunities** – Increase the housing opportunities and living conditions of persons and families who are homeless or who are at risk of homelessness.
- **HO-2 Continuum of Care** – Support the efforts and resources of the Lehigh County Continuum of Care to promote housing opportunities for emergency shelters, transitional housing, and permanent supportive housing for the homeless and those who are at risk of homelessness.
- **HO-3 Support and Management Services** – Provide funding for supportive and management services to governmental and non-profit agencies and organizations to assist persons who are homeless or who are at risk of becoming homeless.
- **HO-4 Homeless Prevention** – Provide funding for programs and activities to address eviction and unfair housing practices which may contribute to homelessness.

SPECIAL NEEDS PRIORITY - SN**Need:**

The County is experiencing an increase in the number of persons aging in place, elderly, persons with physical disabilities, developmentally delayed persons, etc. There is a need to improve living standards for persons with special needs by increasing and expanding public services and public facilities.

Goal:

Goals to address this priority:

- **SN-1 Housing** – Increase the number of decent, safe, sound, sanitary, accessible, and affordable units in the County for the elderly, persons with disabilities, and other special needs populations.

- **SN-2 Accessibility** – Provide funds for improvements to owner-occupied housing and improve renter-occupied housing by making reasonable accommodations for the physically disabled.
- **SN-3 Social Services** – Promote and support social service programs and facilities for all persons with special needs.
- **SN-4 Removal of Architectural Barriers** – Remove Architectural Barriers which restrict the mobility and access to public facilities and services for persons with physical disabilities.
- **SN-5 Transportation** – Provide funds for improving and expanding transportation and access services for the elderly, persons with disabilities, and persons with other special needs.

COMMUNITY DEVELOPMENT PRIORITY - CD

Need:

The County's infrastructure, community facilities and public services are being strained by its population growth, increased demand for services, and the age of infrastructure and facilities. There is a need to improve, preserve, and create public facilities and infrastructure to support the growing population.

Goal:

Goals to address this priority:

- **CD-1 Community Infrastructure** – Improve and upgrade roads, bridges, utilities, sewer systems, ADA accessibility, etc. to meet the increasing demand.
- **CD-2 Community Facilities** – Improve, upgrade, and expand parks, playgrounds, recreational facilities, libraries, public buildings, etc. to meet the needs of the population.
- **CD-3 Public Services** – Provide funding to improve, expand, and create public services for social and welfare programs so they are available to meet the needs of low- and moderate-income residents in the County.
- **CD-4 Food Programs** – Provide assistance for food and nutritional programs to address the needs of the unemployed, underemployed, elderly, disabled, and homeless individuals.
- **CD-5 Clearance/Demolition** – Remove slum and blighting conditions through the demolition and clearance of buildings and sites that pose a threat to the health, safety, and welfare of surrounding residents.
- **CD-6 Public Safety** – Provide funding to improve and expand fire protection, emergency health and management services, crime prevention, etc. to better serve the residents of the county.

- **CD-7 Transportation** – Improve and expand public transportation with additional bus routes, improved bus shelters, increased time schedules, etc. to assist low- and moderate-income persons to access employment medical treatment and essential services.

ECONOMIC DEVELOPMENT PRIORITY - ED

Need:

The local economy in the County has been expanding, however, there is a need for job training and services to meet the employment needs of companies.

Goal:

Goals to address this priority:

- **ED-1 Employment** – Provide funding to support job training, retention, and educational programs to address the need for a well trained labor force.
- **ED-2 Financial Assistance** – Provide funds for new development, expansion, and equipment purchases through economic development programs.
- **ED-3 Revitalization** – Provide assistance in acquiring land and making sites available for redevelopment to promote new development in areas of the County that need to be revitalized.
- **ED-4 Incentives** – Support local, state, and federal tax breaks, tax credits, development bonuses and planning initiatives to create orderly and positive economic development throughout the County.
- **ED-5 Coordination and Cooperation** – Promote, support and form public and private partnerships to improve employee access to jobs through public transportation and the supply of worker housing throughout the County.

ADMINISTRATION, MANAGEMENT, AND PLANNING PRIORITY - AMP

Need:

There is a need for administration, management, and planning services to efficiently and effectively operate Federal and state grant programs.

Goal:

Goals to address this priority:

- **AMP-1 General Administration** – Provide experienced management and oversight to maintain efficient and effective administration of the federal and state grant programs.

- **AMP-2 Staffing** – Hire and retain professional staff and support personnel to provide good management of the programs and activities.
- **AMP-3 Planning** – Provide planning for special studies, environmental review records, fair housing choice activities, promoting Section 3 enterprises, training and outreach, and compliance with federal, state and local laws and ordinances.

3. Evaluation of past performance

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

The FY 2022 CAPER, which was the fourth CAPER for the County's previous Five-Year Consolidated Plan, was approved by HUD in a letter dated March 7, 2024. In the FY 2022 CAPER, the Lehigh County expended 90.02% of its CDBG funds to benefit low- and moderate-income persons. The County expended 9.55% of its funds during the FY 2022 CAPER period on public services, which is below the statutory maximum of 15%. The County expended 18.49% of its funds during the FY 2022 CAPER period on administrative cost, which is below the statutory maximum of 20%.

The County is in compliance with the HUD 1.5 maximum drawdown ratio. The County's ratio was 1.43 as of November 20, 2023.

4. Summary of citizen participation process and consultation process

Lehigh County has followed its Citizen Participation Plan (last updated November 2023) in the planning and preparation of the Five Year Consolidated Plan. The County held two (2) public hearings on the needs of the community and its residents, virtually over Zoom on Tuesday, March 26, 2024 at 3:00 PM and in person on Thursday, March 28, 2024 at 10:00 AM. This provided the residents, agencies and organizations with the opportunity to discuss the County's CDBG and HOME Programs and to provide suggestions for future CDBG and HOME Programs priorities and activities.

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

A copy of the "Draft Five Year Consolidated Plan and the FY 2024 Annual Action Plan" was placed on public display for review by the general public, agencies and organizations in the community. A newspaper notice announcing that these documents were placed on public display was

published in a newspaper of general circulation in the area. The "Draft Five Year Consolidated Plan and the FY 2024 Annual Action Plan" were on public display at the following locations:

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

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

5. Summary of public comments

Lehigh County held two (2) Needs Public Hearings, one on Tuesday, March 26, 2024 at 3:00 PM via Zoom teleconference and the other in person on Thursday, March 28, 2024 at 10:00 AM. Comments received at these sessions are included in the attachments at the end of the Five-Year Plan.

The FY 2024-2028 Five Year Consolidated Plan and FY 2024 Annual Action Plan were placed on public display on Monday, July 1, 2024, and the Second Public Hearing was held on Thursday, July 11, 2024. Comments that were received at the Second Public Hearing are included in the attachments at the end of the Five Year Plan.

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

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

7. Summary

The main goals of the FY 2024-2028 Five Year Consolidated Plan are to:

- need to develop more affordable housing units
- need to make current housing more accessible for the disabled
- need for downpayment and closing cost assistance
- rental assistance
- need for transportation to get individuals to shelter and supportive services
- need to continue funding supportive services
- need to expand shelters
- need job training programs and resources

The Five Year Consolidated Planning process requires that the County prepare in a single document its priorities and goals to address housing needs; homeless needs, Special needs; community development, economic development, and administration. The County will use the Five Year Consolidated Plan priorities and goals to allocate its CDBG and HOME funds over the next five (5) years and to provide direction to its strategic partners, participating agencies, and stakeholder organizations to address the housing and community development needs of the low and moderate-income residents of Lehigh County. HUD will evaluate the County's performance based on the priorities and goals established in the Five Year Consolidated Plan.

The display period started on Monday, July 1, 2024 through Wednesday, July 31, 2024 for at least a 30 day display period. The County put the draft Five Year Consolidated Plan and Annual Action Plan on its website, available at the following URL: <http://www.lehighcounty.org/Departments/Community-Economic-Development> and at the following locations:

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

The Second Public Hearing was held on Thursday, July 11, 2024 at 12:00 PM to discuss the proposed activities and solicit citizen comments on the draft Plans. Upon completion of the 30-day comment period, Lehigh County submitted the FY 2024-2028 Five Year Consolidated Plan and

FY 2024 Annual Action Plan to the U.S. Department of Housing and Urban Development through IDIS on or before Thursday, August 15, 2024.

8. FY 2024 CDBG and HOME Programs Budget

Summary of the FY 2024 CDBG and HOME Allocations:

- FY 2024 CDBG Allocation - \$1,241,195.00
 - CDBG Program Income - \$0.00
 - FY 2024 HOME Allocation - \$457,582.73
 - HOME Program Income - \$0.00
- Total: \$1,698,777.73**

FY 2024 CDBG Program Budget:

Lehigh County proposes to undertake the following activities with the FY 2024 CDBG funds:

1. **Aspire to Autonomy, Inc. (ASPIRE) - Mental Health Therapy** - \$22,000.00
 2. **Black Heritage Association of the Lehigh Valley - Section 3 Certification Outreach and Registry** - \$18,700.00
 3. **Communities in Schools of Eastern Pennsylvania - LCTI Support** - \$25,000.00
 4. **Lehigh Career & Technical Institute - Tuition for Low-Income Residents** - \$30,000.00
 5. **Lehigh Valley Center for Independent Living - People Living in Accessible Community Environments (PLACE)** - \$14,943.00
 6. **Manito Life Center - Therapeutic Riding for At-Risk Adolescents and Adults** - \$30,000.00
 7. **Meals on Wheels - Stable Food Support** - \$15,000.00
 8. **North Penn Legal Services - Fair Housing Outreach** - \$4,000.00
 9. **North Penn Legal Services - Legal Help Project** - \$12,000.00
 10. **New Bethany, Inc. - Kitchen Update and Office Creation** - \$44,103.00
 11. **Community Action Lehigh Valley (CACLV) - Urgent Need Roof and HVAC Replacement Program** - \$45,014.00
 12. **Redevelopment Authority of Lehigh County (RALC) - Blight to Bright** - \$75,000.00
 13. **Coplay Borough - Street Resurfacing** - \$185,471.00
 14. **Emmaus Borough - Curb Cuts** - \$80,000.00
 15. **Macungie Borough - Sanitary Sewer Rehabilitation** - \$75,000.00
 16. **Salisbury Township - Sanitary Sewer Rehabilitation** - \$59,190.00
 17. **Slatington Borough - Willow Street Reconstruction and Curb Cuts** - \$89,605.00
 18. **Slatington Borough - Cherry Street Reconstruction and Curb Cuts** - \$96,465.00
 19. **Slatington Borough - Hill Street Reconstruction** - \$94,165.00
 20. **Administration** - \$ 225,539.00
- Total: \$1,241,195.00**

FY 2024 HOME Program Budget:

Lehigh County proposes to undertake the following activities with the FY 2024 HOME funds:

1. **HOME Administration** - \$45,758.00
 2. **CHDO Set-Aside** - \$68,638.00
 3. **Affordable Housing Project** - \$343,186.73
- Total: \$457,582.73**

DRAFT

The Process

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

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	LEHIGH COUNTY	Community and Economic Development
CDBG Administrator	LEHIGH COUNTY	Community and Economic Development
HOME Administrator	LEHIGH COUNTY	Community and Economic Development

Table 1 – Responsible Agencies

Narrative

The administering lead agency is Lehigh County’s Department of Community and Economic Development. The Community and Economic Development Department (DCED) has six (6) staff members, along with a planning consulting firm to assist with the oversight and compliance for the CDBG, HOME, and housing programs. The Department of Community and Economic Development prepares the Five Year Consolidated Plan, Annual Action Plans, ERR’s, and the Consolidated Annual Performance and Evaluation Reports (CAPER), processes pay requests, and performs contracting and oversight of the programs on a day to day basis. In addition, the planning consulting firm is available to assist the County on an as needed basis.

Consolidated Plan Public Contact Information

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 Email: FrankKane@lehighcounty.org
 Website: <http://www.lehighcounty.org/>

PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

1. Introduction

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

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

Lehigh County works with the following agencies to enhance coordination:

- **Lehigh County Department of Community and Economic Development** - oversees the CDBG and HOME programs.
- **The Lehigh County Housing Authority** – Improvements to public housing communities.
- **Social Services Agencies** – funds to improve services to low and moderate income persons.
- **Housing Providers** – funds to rehabilitate and develop affordable housing and provide housing options for low- and moderate-income households.
- **Lehigh Valley Regional Homeless Advisory Board** - oversees the Continuum of Care Network for Eastern Pennsylvania CoC - Lehigh Valley Regional Homeless Advisory Board for the following counties: Lehigh and Northampton.
- **Community and Economic Development Agencies** – funds to improve services to low and moderate income persons.
- **Municipalities** – funds for infrastructure improvements, public facilities, and demolition.

A part of the CDBG and HOME application planning process, local agencies, organizations, and municipalities were invited to submit proposals for CDBG and HOME funds for eligible activities. These groups participate in the planning process by attending the public hearing and submission of funding applications.

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

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

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

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

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

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

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

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

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

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

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

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

1.	Agency/Group/Organization	Lehigh County
Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Health Agency Child Welfare Agency Other government – County Planning organization Civic Leaders Grantee Department	
What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Lead-based Paint Strategy Anti-poverty Strategy Community Development Strategy	

	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Lehigh County Department of Community & Economic Development coordinated the FY 2024-2028 Five Year Consolidated Plan process. Lehigh County department staff and elected officials were contacted to determine the needs for the County.</p>
<p>2.</p>	<p>Agency/Group/Organization</p>	<p>Lehigh County Housing Authority/Valley Housing Development Corporation</p>
	<p>Agency/Group/Organization Type</p>	<p>Housing PHA Services - Housing Services-Fair Housing</p>
	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Public Housing Needs</p>
	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Lehigh County Housing Authority and Valley Housing Development Corporation were contacted and presented the housing needs of very low-income persons.</p>
<p>3.</p>	<p>Agency/Group/Organization</p>	<p>Lehigh and Northampton Transportation Authority</p>
	<p>Agency/Group/Organization Type</p>	<p>Services-Elderly Persons Services-Persons with Disabilities Other government-County Regional organization Other-Public Transit</p>
	<p>What section of the Plan was addressed by Consultation?</p>	<p>Homeless Needs-Chronically homeless Homeless Needs-Families with children Homelessness Needs-Veterans Homelessness Needs-Unaccompanied Youth Homelessness Strategy Non-Homeless Special Needs Economic Development Anti-poverty Strategy Community Development Strategy</p>

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Lehigh and Northampton Transportation Authority was contacted and presented the transportation needs of low-income persons, elderly persons, persons with disabilities and homeless persons.
4.	Agency/Group/Organization	Redevelopment Authority of Lehigh County (RALC)
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government-County Planning organization Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Redevelopment Authority of Lehigh County (RALC) was contacted and submitted a request for funding for spot blight remediation. The County reviewed the application and funded the activity because it met the goals and objectives as outlined in the County's Five Year Consolidated Plan.
5.	Agency/Group/Organization	City of Allentown DCED
	Agency/Group/Organization Type	Other government – Local Planning Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy Community Development Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Allentown Department of Community and Economic Development was contacted to determine the needs for the City and cooperative strategy with the County.
6.	Agency/Group/Organization	City of Bethlehem DCED
	Agency/Group/Organization Type	Other government – Local Planning Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Bethlehem Department of Community and Economic Development was contacted to determine the needs for the City and cooperative strategy with the County.
7.	Agency/Group/Organization	Alburtis Borough
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Alburtis Borough was contacted to determine the needs for the Borough.
8.	Agency/Group/Organization	Catasauqua Borough
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Catasauqua Borough was contacted to determine the needs for the Borough. The Borough submitted a funding request for road reconstruction on Faith Drive and 11 th Street. The County reviewed the application and did not fund the activity because it was found ineligible by HUD regulations.
9.	Agency/Group/Organization	Coopersburg Borough
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Coopersburg Borough was contacted to determine the needs for the Borough.
10.	Agency/Group/Organization	Coplay Borough
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Coplay Borough was contacted and submitted a request for funding for reconstruction of 11 th Street. The County reviewed the application and funded the activity because it met the goals and objectives as outlined in the County's Five-Year Consolidated Plan.
11.	Agency/Group/Organization	Emmaus Borough
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Emmaus Borough was contacted and submitted a request for funding for curb cuts. The County reviewed the application and funded the activity because it met the goals and objectives as outlined in the County's Five-Year Consolidated Plan.
12.	Agency/Group/Organization	Macungie Borough
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Macungie Borough was contacted and submitted a request for funding for sanitary sewer rehabilitation and slip lining. The County reviewed the application and funded the activity because it met the goals and objectives as outlined in the County's Five-Year Consolidated Plan.
13.	Agency/Group/Organization	Slatington Borough
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Slatington Borough was contacted and submitted three requests for funding for road reconstruction and curb cuts on Willow, Cherry, and Hill Streets. The County reviewed the applications and funded the activities because they met the goals and objectives as outlined in the County's Five-Year Consolidated Plan.
14.	Agency/Group/Organization	Lower Macungie Township
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Lower Macungie Township was contacted to determine the needs for the Township.
15.	Agency/Group/Organization	North Whitehall Township
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	North Whitehall Township was contacted to determine the needs for the Township.
16.	Agency/Group/Organization	Salisbury Township
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Salisbury Township was contacted and submitted a request for funding for sanitary sewer rehabilitation and slip lining. The County reviewed the application and funded the activity because it met the goals and objectives as outlined in the County's Five-Year Consolidated Plan.
17.	Agency/Group/Organization	South Whitehall Township
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	South Whitehall Township was contacted to determine the needs for the Township.
18.	Agency/Group/Organization	Upper Macungie Township
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Upper Macungie Township was contacted to determine the needs for the Township.
19.	Agency/Group/Organization	Whitehall Township
	Agency/Group/Organization Type	Agency-Management of Public Land or Water Resources Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Whitehall Township was contacted to determine the needs for the Township.
20.	Agency/Group/Organization	Allentown Housing Authority
	Agency/Group/Organization Type	Housing PHA Services-Housing Services-Fair Housing Other government-Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Allentown Housing Authority was contacted to determine the public housing needs of Allentown and cooperative strategy with the County and the LCHA.
21.	Agency/Group/Organization	Lehigh Valley Health Network
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Health Health Agency Child Welfare Agency Major Employer

	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy</p>
	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Lehigh Valley Health Network was contacted to determine the needs of LMI residents, homeless individuals, persons at risk of homelessness, and persons with HIV/AIDS living in Lehigh County.</p>
<p>22.</p>	<p>Agency/Group/Organization</p>	<p>The Advocacy Alliance</p>
	<p>Agency/Group/Organization Type</p>	<p>Services-Persons with Disabilities Services-Health Services-Education Regional organization</p>
	<p>What section of the Plan was addressed by Consultation?</p>	<p>Non-Homeless Special Needs Anti-poverty Strategy</p>
	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The Advocacy Alliance was contacted and provided information on the needs of persons with mental and developmental disabilities in Lehigh County.</p>
<p>23.</p>	<p>Agency/Group/Organization</p>	<p>Allentown Rescue Mission</p>
	<p>Agency/Group/Organization Type</p>	<p>Services-Elderly Persons Services-Homeless Services-Education Services-Employment</p>

<p>What section of the Plan was addressed by Consultation?</p>	<p>Homeless Needs-Chronically homeless Homelessness Needs-Veterans Homelessness Strategy HOPWA Strategy Economic Development Anti-poverty Strategy Community Development Strategy</p>
<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Allentown Rescue Mission was contacted and provided information on the needs of the homeless community in the Lehigh Valley.</p>

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24.	Agency/Group/Organization	Aspire to Autonomy, Inc. (ASPIRE)
	Agency/Group/Organization Type	Services-Victims of Domestic Violence Services-Victims Regional organization
	What section of the Plan was addressed by Consultation?	Homeless Needs-Families with children Homelessness Needs-Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	ASPIRE was contacted to discuss the prevalence of human trafficking in Lehigh County, and it submitted a request for funding for operating costs for mental health therapy for victims of human trafficking or those at high risk of being trafficked. The County reviewed the application and funded the activity because it met the goals and objectives as outlined in the County's Five-Year Consolidated Plan.
25.	Agency/Group/Organization	Community Action Lehigh Valley (CACLV)
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Regional organization Planning organization Neighborhood Organization

	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy</p>
	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>CACLV was contacted regarding the needs of low- and moderate-income individuals in Lehigh County, and submitted a funding request for an urgent need roof and HVAC replacement program. The County reviewed the application and funded the activity because it met the goals and objectives as outlined in the County’s Five Year Consolidated Plan.</p>
<p>26.</p>	<p>Agency/Group/Organization</p>	<p>VIA of the Lehigh Valley</p>
	<p>Agency/Group/Organization Type</p>	<p>Services-Children Services-Persons with Disabilities Services-Health Services-Education Regional organization</p>
	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy</p>

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	VIA was contacted and provided information on the needs of children and youth with autism and developmental disabilities.
27.	Agency/Group/Organization	Greater Valley YMCA
	Agency/Group/Organization Type	Services-Housing Services-Children Services-Elderly Persons Services-Victims of Domestic Violence Services-Homeless Services-Health Services-Education Services-Victims Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs-Chronically homeless Homeless Needs-Families with children Homelessness Needs-Veterans Homelessness Needs-Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The YMCA was contacted and provided information on the needs of children, elderly persons, and LMI residents of the Lehigh Valley.
28.	Agency/Group/Organization	Meals on Wheels of the Greater Lehigh Valley
	Agency/Group/Organization Type	Services-Elderly Persons Services-Health
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy

	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Meals on Wheels provided information on elderly, disabled, and special needs in Lehigh County. Meals on Wheels submitted an application for funding for a meal delivery program. The County reviewed the application and funded the activity because it met the goals and objectives as outlined in the County's Five Year Consolidated Plan.</p>
<p>29.</p>	<p>Agency/Group/Organization</p>	<p>Lehigh Conference of Churches</p>
	<p>Agency/Group/Organization Type</p>	<p>Housing Services-Children Services-Elderly Persons Services-Victims of Domestic Violence Services-homeless Services - Victims Regional organization Civic Leaders</p>
	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy</p>
	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Lehigh Conference of Churches was contacted and presented the needs of homeless and at-risk persons and households in Lehigh County.</p>
<p>30.</p>	<p>Agency/Group/Organization</p>	<p>Valley Youth House</p>
	<p>Agency/Group/Organization Type</p>	<p>Housing Services - Housing Services-Children Services-homeless Service-Fair Housing Child Welfare Agency Publicly Funded Institution/System of Care</p>

	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy</p>
	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Valley Youth House was contacted regarding the needs of homeless and at-risk children and youth in Lehigh County.</p>
<p>31.</p>	<p>Agency/Group/Organization</p>	<p>United Way of the Greater Lehigh Valley</p>
	<p>Agency/Group/Organization Type</p>	<p>Services-Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-Homeless Services-Health Services-Education Services-Employment Services-Fair Housing Services-Victims Regional organization Civic Leaders</p>

	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Homeless Needs-Chronically homeless Homeless Needs-Families with children Homelessness Needs-Veterans Homelessness Needs-Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Market Analysis Economic Development Anti-poverty Strategy Community Development Strategy</p>
	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The United Way was contacted regarding the needs of LMI residents, homeless persons, and persons at-risk of becoming homeless in Lehigh County.</p>
<p>32.</p>	<p>Agency/Group/Organization</p>	<p>The Salvation Army</p>
	<p>Agency/Group/Organization Type</p>	<p>Services - Housing Services-Children Services-Elderly Persons Services-Victims of Domestic Violence Services-homeless Services - Victims</p>
	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy</p>

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Salvation Army was contacted regarding the needs of LMI residents, homeless persons, and persons at-risk of becoming homeless in Lehigh County.
33.	Agency/Group/Organization	Lehigh Valley Center for Independent Living
	Agency/Group/Organization Type	Housing Services-Housing Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	LVCIL was contacted to discuss the needs of elderly and disabled persons in Lehigh County, and submitted a request for continued funding for housing location assistance. The County reviewed the application and funded the activity because it met the goals and objectives as outlined in the County's Five Year Consolidated Plan.
34.	Agency/Group/Organization	Manito Life Center
	Agency/Group/Organization Type	Services-Children Services-Education
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy Community Development Strategy

	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Manito Life Center was contacted regarding the needs of at-risk youth, and submitted a request for funding to provide once a week counseling sessions for 14 weeks, to 35 adolescents having a history of stress, anxiety, eating disorders, suicidal tendencies, and are at risk of violent behaviors through LVHN. The County reviewed the application and funded the activity because it met the goals and objectives as outlined in the County’s Five Year Consolidated Plan.</p>
<p>35.</p>	<p>Agency/Group/Organization</p>	<p>Turning Point of the Lehigh Valley, Inc.</p>
	<p>Agency/Group/Organization Type</p>	<p>Housing Services - Housing Services-Children Services-Victims of Domestic Violence Services - Victims Child Welfare Agency Publicly Funded Institution/System of Care</p>
	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy</p>
	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Turning Point was contacted for information regarding domestic violence issues in Lehigh County.</p>

36.	Agency/Group/Organization	Casa Guadalupe Center
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Education Services-Employment Child Welfare Agency Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Casa Guadalupe was contacted for information regarding the needs of Hispanic and LMI residents of the Lehigh Valley.
37.	Agency/Group/Organization	New Bethany, Inc.
	Agency/Group/Organization Type	Services-Housing Services-Homeless Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis Anti-poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	New Bethany, Inc. was contacted about homelessness strategy in Lehigh County, and submitted a CDBG request for funding for building renovation. The County reviewed its application and funded this activity because it met the goals and objectives as outlined in the County’s Five Year Consolidated Plan.
38.	Agency/Group/Organization	Whitehall Active Community Center (WACC)
	Agency/Group/Organization Type	Services-Elderly Persons Services-Health Neighborhood organization
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Whitehall Active Community Center (WACC) was contacted about non-homeless special needs in Lehigh County, and submitted a CDBG request for funding for building renovation. The County reviewed the application and did not fund the activity.
39.	Agency/Group/Organization	Fine Feather Foundation
	Agency/Group/Organization Type	Services-Children Services-Education Civic Leaders
	What section of the Plan was addressed by Consultation?	Homeless Needs-Families with children Homelessness Needs-Unaccompanied youth Non-Homeless Special Needs Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Fine Feather Foundation was contacted for information regarding youth enrichment and education needs in the Lehigh Valley.
	Agency/Group/Organization	Communities in Schools of Eastern Pennsylvania

40.	Agency/Group/Organization Type	Services-Children Services-Education Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Communities in Schools was contacted about educational needs in Lehigh County and submitted a request for funding (in collaboration with the Lehigh Career and Technical Institute, LCTI) for case management and assistance for low-income students enrolled at LCTI. The County reviewed its application and funded this activity because it met the goals and objectives as outlined in the County's Five Year Consolidated Plan.
41.	Agency/Group/Organization	Lehigh Career & Technical Institute (LCTI)
	Agency/Group/Organization Type	Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	LCTI was contacted about job training needs for LMI persons and submitted a request for funding for tuition for low-income students enrolled at LCTI. The County reviewed its application and funded this activity because it met the goals and objectives as outlined in the County's Five Year Consolidated Plan.

42.	Agency/Group/Organization	Black Heritage Association of the Lehigh Valley
	Agency/Group/Organization Type	Services-Employment Regional Organization Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Black Heritage Association of the Lehigh Valley was contacted and submitted a request for new funding to prepare LMI residents for construction careers. The County reviewed its application and funded this activity because it met the goals and objectives as outlined in the County's Five Year Consolidated Plan.
43.	Agency/Group/Organization	North Penn Legal Services
	Agency/Group/Organization Type	Services – Housing Services-Elderly Persons Services-Victims of Domestic Violence Services-Victims Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	North Penn Legal Services was contacted and submitted requests for continued funding for fair housing activities and for legal aid to LMI residents. The County reviewed these two applications and funded these activities because they met the goals and objectives as outlined in the County's Five Year Consolidated Plan.
	Agency/Group/Organization	Housing Equality Center

44.	Agency/Group/Organization Type	Services-Education Services-Fair Housing Regional Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Housing Equality Center was contacted for information regarding the fair housing needs of the Lehigh Valley.
45.	Agency/Group/Organization	Fair Housing Rights Center of Southeastern Pennsylvania
	Agency/Group/Organization Type	Services-Education Services-Fair Housing Regional Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Fair Housing Rights Center was contacted to determine the fair housing needs of LMI residents in Lehigh County.
46.	Agency/Group/Organization	Financial Literacy Center
	Agency/Group/Organization Type	Services-Education Business and Civic Leaders Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Housing Special Needs Market Analysis Anti-poverty Strategy Community Development Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Financial Literacy Center was contacted to determine the financial and budgetary needs of low- and moderate-income residents of Lehigh County.
47.	Agency/Group/Organization	Community First Fund
	Agency/Group/Organization Type	Housing Services - Housing Services-Employment Community Development Financial Institution
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Community First Fund was contacted and presented information on availability of small business loans and home loans to persons with poor or no credit in Lehigh County.
48.	Agency/Group/Organization	Greater Lehigh Association of Realtors
	Agency/Group/Organization Type	Services-Housing Services-Fair Housing Business Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development Community Development Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Greater Lehigh Association of Realtors was contacted regarding the availability of affordable housing in Lehigh County.
49.	Agency/Group/Organization	Lehigh Valley Chamber of Commerce
	Agency/Group/Organization Type	Regional organization Planning organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Lehigh Valley Chamber of Commerce was contacted regarding the economic development needs and strategy of Lehigh County.
50.	Agency/Group/Organization	Embassy Bank
	Agency/Group/Organization Type	Business Leaders Private Sector Banking / Financing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Embassy Bank was contacted and presented information on the home lending market for LMI residents.
51.	Agency/Group/Organization	QNB Bank
	Agency/Group/Organization Type	Business Leaders Private Sector Banking / Financing

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	QNB Bank was contacted and presented information on the home lending market for LMI residents.
52.	Agency/Group/Organization	Eastern Pennsylvania Continuum of Care (CoC)
	Agency/Group/Organization Type	Housing Services - Housing Publicly Funded Institution/System of Care
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Eastern PA CoC was contacted to ascertain homeless priorities, social service status, and economic development needs.
53.	Agency/Group/Organization	Pennsylvania Department of Health
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-Health Health Agency Child Welfare Agency Publicly Funded Institution/System of Care Other government-State

	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs HOPWA Strategy Lead-based Paint Strategy Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The County consulted the 2021 Childhood Lead Surveillance Annual Report released by the Pennsylvania Department of Health. The data identified in the Report is incorporated in the Annual Action Plan. The County consulted the 2022 Annual HIV Surveillance Summary Report released by the Pennsylvania Department of Health. The data identified in the Report is incorporated in the Annual Action Plan.
54.	Agency/Group/Organization	USDA Rural Utilities
	Agency/Group/Organization Type	Services-Broadband Internet Service Provider Services-Narrowing the Digital Divide
	What section of the Plan was addressed by Consultation?	Economic Development Other-Broadband Access Plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	USDA Rural Activities was contacted to ascertain broadband access needs.
55.	Agency/Group/Organization	Comcast/Xfinity
	Agency/Group/Organization Type	Services-Broadband Internet Service Provider Services-Narrowing the Digital Divide
	What section of the Plan was addressed by Consultation?	Economic Development Other-Broadband Access Plan

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Comcast’s service plans were examined to ascertain broadband access in the Lehigh Valley.
56.	Agency/Group/Organization	Verizon
	Agency/Group/Organization Type	Services-Broadband Internet Service Provider Services-Narrowing the Digital Divide
	What section of the Plan was addressed by Consultation?	Economic Development Other-Broadband Access Plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Verizon’s service plans were examined to ascertain broadband access in the Lehigh Valley.

Table 2 – Agencies, groups, organizations who participated

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

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

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

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

Table 3 – Other local / regional / federal planning efforts

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

Lehigh County’s Department of Community and Economic Development is the administrating agency for the CDBG and HOME programs. Close coordination is maintained with other County departments such as the Public Works, Parks & Recreation, Administration, Emergency Management, Lehigh County Housing Authority, the Eastern PA Continuum of Care, and the Lehigh Valley Planning Commission, as well as local municipalities such as Coopersburg, Slatington, Macungie, Alburtis, and Coplay Boroughs and Salisbury and Whitehall Townships.

Coordination with various non-profit organizations, such as Lehigh Valley Conference of Churches, North Penn Legal Services, Valley Youth House, Catholic Charities, Turning Point of the Lehigh Valley, and Casa Guadalupe Center helped aid the planning process which developed priorities. The County works closely with the Lehigh County Commissioners and County staff to address projects and activities that extend between multiple municipalities within the County.

Narrative (optional):

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

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PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)**1. Summary of citizen participation process/Efforts made to broaden citizen participation****Summarize citizen participation process and how it impacted goal-setting**

Lehigh County has followed its Citizens Participation Plan that was last revised and updated in November 2023 to develop its Five Year Consolidated Plan.

The FY 2024-2028 Consolidated Plan and FY 2024 Annual Action Plan have many components that require and encourage citizen participation. These components consist of the following:

- interviews and roundtable discussions with various stakeholders;
- virtual and telephone interviews;
- consultation with different County Departments;
- public needs hearing;
- residential survey;
- agency/organization survey;
- request for proposals for funding (RFP's) from agencies/organizations;
- placing the draft FY 2024-2028 Five Year Consolidated Plan and FY 2024 Annual Action Plan on public display for at least 30 days; and
- a public hearing to gather comments on the draft plans on public display.

The Resident Survey was made available in an online version on the County's website and in a hard copy version available in the Lehigh County Government Center, Lehigh County Housing Authority's communities, and other public facilities. The County received 94 completed residential surveys and 5 completed agency surveys. All of these comments are included in the Five Year Consolidated Plan and Annual Action Plan in the Exhibit Section. Through the citizen participation process, the County uses citizen input to develop how the plan would best serve the low- and moderate-income population and to reach the goals set forth in the Five Year Consolidated Plan.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response / attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1.	Newspaper Ad #1	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing Agencies/Organizations	The needs public hearing notice was published on Wednesday, March 13, 2024 in the local newspaper "The Morning Call". A copy can be found in the Citizen Participation Section of the Five Year Consolidated Plan.	The proof of publication for the ads are included in the Citizen Participation Appendix of the Five Year Consolidated Plan.	None.	Not Applicable.
2.	Public Hearing #1 (Needs)	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing Agencies/Organizations	Lehigh County held two needs public hearings: a virtual hearing on March 26, 2024 at 3:00 PM over Zoom, and an in-person hearing was held on March 28, 2024 at 10:00 AM in Room 524 of the Lehigh County Government Center. See public hearing sign-in sheets in the Exhibit section of the Five Year Consolidated Plan.	See public hearing comments in the Exhibits section of the Five Year Consolidated Plan.	None.	http://www.lehighcounty.org
3.	Internet Outreach	Non-targeted/broad community	None.	None.	None.	http://www.lehighcounty.org

Sort Order	Mode of Outreach	Target of Outreach	Summary of response / attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
4.	Email Blast	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing Agencies/Organizations	The email blast was sent out on March 13, 2024 to the distribution list. Municipalities and agencies/organizations submitted applications for funding and provided comments at the public hearings.	Of the twenty-four (24) funding applications received in FY 2024, twenty-three (23) were funded. Lehigh County needs were addressed through the funded projects.	None.	Not Applicable.
5.	Resident Surveys	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Placed the Resident Survey on the County's website and emailed surveys to agencies/organizations. In addition, they were passed out at public hearing and agencies/organizations meetings.	The County received 94 completed resident surveys. The tabulations of the Resident Surveys are in the Exhibit section of this Five Year Consolidated Plan.	All comments were accepted.	https://www.surveymonkey.com/r/Lehigh24-28ConPlan and https://es.surveymonkey.com/r/Lehigh24-28ConPlanESP

Sort Order	Mode of Outreach	Target of Outreach	Summary of response / attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
6.	Agency / Organization Surveys	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing Agencies/Organizations	The agency/ organization surveys were sent out to agencies and organizations in the County.	The County received 5 completed agency/organization surveys. A summary of the survey responses and meeting minutes can be found in the Exhibit section of this Five Year Consolidated Plan.	All comments were accepted.	Not Applicable.
7.	Newspaper Ad #2	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing Agencies/Organizations	The second public hearing notice was published on Sunday, June 30, 2024 in the local newspaper "The Morning Call". A copy can be found in the Citizen Participation Section of the Five Year Consolidated Plan.	None.	None.	Not Applicable.

Sort Order	Mode of Outreach	Target of Outreach	Summary of response / attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
8.	Public Hearing #2	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing Agencies/Organizations	Lehigh County held a second public hearing on July 11, 2024 at 12:00 PM in Room 524 of the Lehigh County Government Center. See public hearing sign-in sheets in the Exhibit section of the Five Year Consolidated Plan.	See public hearing comments in the Exhibits section of the Five Year Consolidated Plan.	None.	Not Applicable.

Table 4 – Citizen Participation Outreach

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Needs Assessment

NA-05 Overview

Needs Assessment Overview

Lehigh County used the HUD Comprehensive Housing Affordability Strategy (CHAS) data, which provides statistical data on housing needs, to prepare its estimates and projects. The tables in this section have been prepopulated with data from the 2018-2022 American Community Survey (ACS) Five Year Estimates, the 2020 U.S. Census, and HUD data sets based on the American Community Survey (ACS) 2016-2020 Five Year Estimates. This data is the most current information available to assess housing needs, homeless needs, special needs, social service needs, economic development needs, etc.

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

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

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

Summary of Housing Needs

Demographics	Base Year: 2009	Most Recent Year: 2020	% Change
Population	214,055	222,320	4%
Households	82,875	87,350	5%
Median Income	\$56,117.00	\$66,214.00	18%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	6,405	8,450	13,830	9,040	49,620
Small Family Households	1,175	2,129	4,210	3,350	26,925
Large Family Households	235	449	1,107	876	4,419
Household contains at least one person 62-74 years of age	1,860	2,029	4,036	2,487	11,765
Household contains at least one person age 75 or older	1,746	2,540	2,976	1,138	4,097
Households with one or more children 6 years old or younger	532	732	1,893	1,100	5,361

Table 6 - Total Households Table

Data Source: 2016-2020 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	310	150	139	20	619	39	20	35	35	129
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	0	10	25	10	45	0	0	0	65	65
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	10	55	83	0	148	30	45	58	10	143
Housing cost burden greater than 50% of income (and none of the above problems)	1,779	1,519	163	55	3,516	2,160	1,138	928	79	4,305

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	220	1,548	1,677	610	4,055	564	1,568	2,965	1,508	6,605
Zero/negative Income (and none of the above problems)	210	0	0	0	210	213	0	0	0	213

Table 7 – Housing Problems Table

Data Source: 2016-2020 CHAS

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

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	2,094	1,724	413	85	4,316	2,230	1,203	1,024	190	4,647
Having none of four housing problems	1,159	2,144	3,834	2,120	9,257	919	3,400	8,540	6,635	19,494
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

Table 8 – Housing Problems 2

Data Source: 2016-2020 CHAS

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	321	1,304	636	2,261	594	591	1,435	2,620
Large Related	150	258	148	556	85	129	621	835
Elderly	1,187	960	646	2,793	1,594	1,591	1,297	4,482
Other	581	700	423	1,704	483	395	530	1,408
Total need by income	2,239	3,222	1,853	7,314	2,756	2,706	3,883	9,345

Table 9 – Cost Burden > 30%

Data Source: 2016-2020 CHAS

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	0	0	610	610	569	348	0	917
Large Related	0	0	109	109	55	80	54	189
Elderly	1,017	452	139	1,608	1,085	460	399	1,944
Other	0	537	470	1,007	449	0	0	449
Total need by income	1,017	989	1,328	3,334	2,158	888	453	3,499

Table 10 – Cost Burden > 50%

Data Source: 2016-2020 CHAS

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	10	55	148	0	213	0	45	43	75	163
Multiple, unrelated family households	0	0	0	0	0	30	0	15	0	45

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Other, non-family households	25	10	25	10	70	0	0	0	0	0
Total need by income	35	65	173	10	283	30	45	58	75	208

Table 11 – Crowding Information – 1/2

Data Source: 2016-2020 CHAS

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

According to the 2018-2022 American Community Survey (ACS), there is approximately 96,454 households in Lehigh County. Based on this number of households, 24,451 of all households were single person households living alone. Of the County’s single person households, 11,701 single person households or 47.9% were age 65 or older. This number is further broken down into senior single person owner-occupied households (7,976) and renter-occupied households (3,825). Almost half of the County’s single person households are seniors. Based on the 2016-2020 CHAS estimates, 52% of all persons with a cost burden on housing of >50% are classified as elderly. It can be assumed that senior single person households will require additional special housing needs beyond the needs of younger single person households. The County will need to consider providing supportive service for housing affordability, and aging in place.

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

Disabled Population – Based on the 2016-2020 CHAS Data and the 2016-2020 ACS Data, it is estimated that 20.1% of disabled householders have a housing problem that includes cost overburdened by 30% or another type of housing problem, but 35.4% of all disabled renters have a housing problem that includes cost overburdened by 30% or another type of housing problem.

Victims of Domestic Violence, Dating Violence, sexual assault, and stalking – Based on consultation with Turning Point of the LV, it is estimated that more than 3,000 persons in the Lehigh Valley experience domestic violence, dating violence, sexual assault, and stalking per year, and are in need of housing assistance.

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

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

What are the most common housing problems?

The most common housing problem in Lehigh County is housing affordability. According to the 2016-2020 CHAS data and 2018-2022 ACS data, approximately 41.5% of all renter households are cost burdened by 30% or more and an estimated 21% of all owner-occupied households are cost burdened by 30% or more.

In consultations with stakeholder organizations, the lack of affordable, decent, and safe housing is one of the most pressing issues in Lehigh County. The lack of affordable housing options has been cited as an issue across all municipalities in Lehigh County. Due to economic growth in the region, Lehigh County has seen a large increase in the demand for both owner-occupied and rental housing units. Many townships have seen rural farms converted into residential communities to support the influx in population.

There is a need for both owner-occupied and renter-occupied housing units in Lehigh County. First time home buyers struggle to find affordable housing near their places of work.

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

Almost all demographics are affected by the lack of affordable housing. Seniors aging in place have faced issues where their housing units are not accessible to their changing needs, but the cost of ADA accessible units or senior living centers are too high. Families have also experienced difficulty in finding affordable housing units which can accommodate three or more people. A portion of Lehigh County has experienced language barriers when looking for available rental units. This population is especially vulnerable to substandard housing conditions. Rent increases have greatly affected the availability of housing for lower- and middle-income households in the region, forcing many to move away and commute into the County. There is a need for education and outreach for tenant rights and fair housing rights in both English and Spanish.

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

According to organizations that provide services to the homeless, characteristics and needs of both low-income individuals and families with children who receive services at local shelters are as follows:

Individuals: Mental health issues; lack of transportation to shelters and job opportunities; increase in youths experiencing homelessness; persons fleeing domestic violence; and substance abuse issues.

Families with Children: Single mothers; no means of transportation; lack of affordable childcare; a lack of education; a lack of job skills; evictions; unemployed, or underemployed; and lack of family support.

Formerly Homeless Individuals / Families Receiving Rapid Re-Housing Assistance Nearing Termination: Further assistance to this target group may be provided for a limited time if an event should occur through no fault of their own and if required documentation can be provided. Examples include hospitalization due to illness or surgery, lay-off from employment, or a sudden and drastic cut in work hours.

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

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

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

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

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

- Being evicted from a private dwelling unit (including housing provided by family/friends);
- Being discharged from a hospital or other institution;
- Living in a hotel or motel and lacking the financial resources to remain housed in the establishment; or

- Living in housing that has been condemned by housing officials and is no longer considered meant for human habitation.

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

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

Unstably housed and at-risk of losing their housing - persons who are housed and maybe at-risk of losing housing, include:

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

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

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

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

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

Discussion

The population of Lehigh County is increasing, and many residents are facing the effects of increased housing costs and a shortage of decent, safe, sound, and accessible housing that is affordable to low income persons. The population increased over the past 10 years by 4% while the amount of affordable housing has not kept pace with the population.

DRAFT

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

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

Introduction

The following tables are populated with information compiled from the 2016-2020 Consolidated Housing Affordability Strategy (CHAS). Disproportionately greater need is defined as a group having at least 10 percentage points higher than the percentage of persons as a whole. The racial composition of households in Lehigh County, according to the 2018-2022 American Community Survey, was 86.7% white, 2.8% black or African American, 0.12% Native American, 3.0% Asian, .03% pacific islander, and approximately 8.4% some other race or two or more races. The Hispanic or Latino households made up 7.3%.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,522	846	527
White	3,522	571	418
Black / African American	325	20	0
Asian	144	115	30
American Indian, Alaska Native	15	0	0
Pacific Islander	0	0	0
Hispanic	494	123	59

Table 12 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2016-2020 CHAS

*The four housing problems are:

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

Note: the number of Hispanic or Latino households with one or more of the four housing problems has increased since the previous Five Year Consolidated Plan.

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	5,563	2,206	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
White	4,722	2,026	0
Black / African American	168	14	0
Asian	154	15	0
American Indian, Alaska Native	0	25	0
Pacific Islander	0	0	0
Hispanic	510	90	0

Table 13 - Disproportionally Greater Need 30 - 50% AMI

Data 2016-2020 CHAS
 Source:

*The four housing problems are:

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

Note: the number of Hispanic or Latino households with one or more of the four housing problems has increased since the previous Five Year Consolidated Plan.

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,246	6,660	0
White	5,326	6,034	0
Black / African American	268	20	0
Asian	110	118	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	468	393	0

Table 14 - Disproportionally Greater Need 50 - 80% AMI

Data 2016-2020 CHAS
 Source:

*The four housing problems are:

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

Note: the number of Hispanic or Latino households with one or more of the four housing problems has increased since the previous Five Year Consolidated Plan.

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,525	7,127	0
White	2,198	6,252	0
Black / African American	74	100	0
Asian	60	113	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	147	560	0

Table 15 - Disproportionally Greater Need 80 - 100% AMI

Data 2016-2020 CHAS
 Source:

*The four housing problems are:

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

Note: the number of Hispanic or Latino households with one or more of the four housing problems has increased since the previous Five Year Consolidated Plan.

Discussion

The racial composition of households in Lehigh County, according to the 2018-2022 American Community Survey, was 86.7% white, 2.8% black or African American, 0.12% Native American, 3.0% Asian, .03% pacific islander, and approximately 8.4% some other race or two or more races. The Hispanic or Latino population was 7.3%. The Hispanic or Latino household population showed the largest increase in having one or more of the four housing problems across all four identified income categories. This increase is in tandem with the increase of the Hispanic or Latino household population of Lehigh County. The highest percentage of Hispanic or Latino households experiencing one or more housing problem was 10.9% of all households in the 0-30% income range. Although there were no single demographic experiencing a disproportionately greater need, several demographics are experiencing housing problems at a higher percentage when compared to the County population. The percentage of 0-30% AMI Black or African American households experiencing at least one housing problem is approximately 7.2%. This is almost three times the total percentage (2.8%) of black or African American households in Lehigh County. Under the 50-80% AMI category, Black households made up approximately 4.3% of all households with a housing problem. The remaining income categories, Black households were in line with the total percentage of the County.

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

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

Introduction

During the planning process for the preparation of Lehigh County’s Five Year Consolidated Plan, an evaluation was made to determine if any racial or ethnic group is disproportionately affected. Disproportionately greater need is defined as a group having at least 10 percentage points higher than the percentage of persons as a whole. Severe housing problems are distinguished from housing problems by a threshold of more than 1.5 persons per room, as opposed to more than 1 persons per room for overcrowding, as well as a cost burden threshold of over 50% of income as opposed to over 30% of income. Data detailing information by racial group and Hispanic origin has been compiled from the 2016-2020 CHAS data and the 2018-2022 American Community Survey Five Year Estimates. The following tables illustrate the disproportionate needs of specific groups living in Lehigh County.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,951	1,413	527
White	2,990	1,078	418
Black / African American	310	35	0
Asian	139	119	30
American Indian, Alaska Native	15	0	0
Pacific Islander	0	0	0
Hispanic	464	158	59

Table 16 – Severe Housing Problems 0 - 30% AMI

Data Source: 2016-2020 CHAS

*The four severe housing problems are:

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

Note: All demographics experienced a decrease in the number of households experiencing one or more housing problem except for Hispanic or Latino households.

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,657	5,097	0
White	2,162	4,587	0
Black / African American	123	67	0
Asian	90	79	0
American Indian, Alaska Native	0	25	0
Pacific Islander	0	0	0
Hispanic	294	309	0

Table 17 – Severe Housing Problems 30 - 50% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

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

Note: since the previous consolidated plan all households experienced an increase in the number experiencing housing problems, except white households,.

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,987	10,915	0
White	1,718	9,629	0
Black / African American	50	238	0
Asian	25	199	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	150	702	0

Table 18 – Severe Housing Problems 50 - 80% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

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

Note: the number of Hispanic or Latino households with one or more housing problems increased from the previous Five Year Consolidated Plan.

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	490	9,155	0
White	421	8,020	0
Black / African American	34	140	0
Asian	0	173	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	15	694	0

Table 19 – Severe Housing Problems 80 - 100% AMI

Data 2016-2020 CHAS
 Source:

*The four severe housing problems are:

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

Note: there was a large decrease in number of households with 80-100% income with one or more housing problem in the last five years.

Discussion

The racial composition of households in Lehigh County, according to the 2018-2022 American Community Survey, was 86.7% white, 2.8% black or African American, 0.12% Native American, 3.0% Asian, .03% pacific islander, and approximately 8.4% some other race or two or more races. The Hispanic or Latino population was 7.3%. In the 0-30% of Area Median Income (AMI) category, every demographic is within 10 percentage points higher of the overall composition of the county. However, the percent of black or African American (8%), Hispanic or Latino (12%), and Asian (4%) households which have one or more severe housing problems with 0-30% AMI are all higher than their percentage of households in the County. This trend lessens in each income level. With the 30-50% AMI category of households with one or more housing problems, African American households make up 5%, Asian households make up 3%, and Hispanic or Latino make up 11%. With the 50-80% AMI category of households with one or more housing problems, African American households are 3%, Asian households are 1%, and Hispanic or Latino are 8%. Black or African American households make up 7% of all households 80-100% of the AMI with one or more housing problems. Hispanic households in the same income level with one or more severe housing problems make up 3%. In general, at each income percentage of the AMI, the number of households not experiencing a

housing problem outnumbers the number which are experiencing severe housing problems. The exception is the 0-30% AMI category where the number of households experiencing one or more severe housing problems is 3,951 and the number of households with no housing problems is 1,413.

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

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

Introduction:

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

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	63,987	13,696	8,519	609
White	57,039	11,850	6,853	448
Black / African American	858	470	394	55
Asian	2,272	347	314	30
American Indian, Alaska Native	50	0	15	0
Pacific Islander	0	0	0	0
Hispanic	3,108	911	900	59

Table 20 – Greater Need: Housing Cost Burdens AMI

Data Source: 2016-2020 CHAS

Discussion:

The racial composition of households in Lehigh County, according to the 2018-2022 American Community Survey, was 86% white, 2.8% black or African American, 0.12% Native American, 3.0% Asian, and approximately 8.4% some other race or two or more races. The Hispanic or Latino population was 7.3%. A total of 57,039 white households were cost burdened by 30% or under this is approximately 89% of the total households cost burdened by 30% or under. This is a slightly larger percentage than the total percentage of white households. White households were the largest percentage of households cost burdened by 30-50% and severely cost burdened by greater than 50%. White households made up a total of 11,850 or 86.5% of all households cost burdened by 30-50% and a total of 6,853 or 80% of all households cost burdened by greater than 50%.

In general, all household types experiencing any amount of cost burden are in line with the total percentages of households in Lehigh County. A total of 470 black or African American households were

considered cost burdened by 30-50% which is 3.4% of the total households cost burdened. This is slightly higher than the total percentage of black or African American households in the County. A total of 347 Asian households are cost burdened by 30-50%. This is equal to 2.5% of the total households cost burdened by 30-50%. The amount of Hispanic or Latino households cost burdened by 30-50% is 911 which is 6.5%. This is below the total percentage of Hispanic households in Lehigh County.

A total of 394 Black or African American households are severely cost burdened, which is 4.6% of all households severely cost burdened. This is higher than the total percentage of black households in the County. A total of 314 Asian households are considered severely cost burdened by greater than 50%. This is approximately 3.7% of all households severely cost burdened. 15 Native American or Alaskan Native households were severely cost burdened which is 0.17% of all households. Hispanic or Latino households made up 900 or 10.5% of all severely cost burdened households. This number is above the 8.8% of the total number of Hispanic or Latino households in the County.

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NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

The racial composition of households in Lehigh County, according to the 2018-2022 American Community Survey, was 86% white, 2.8% black or African American, 0.12% Native American, 3.0% Asian, and approximately 8.4% some other race or two or more races. The Hispanic or Latino households made up 7.3%. There are no disproportionately impacted ethnic or racial groups (at least 10 percentage points higher than the percentage of persons as a whole) with a housing problem, severe housing problem, housing cost burden or severe housing cost burden.

According to the 2016-2020 CHAS data, 15.6% of all White households, 26.5% of all Black or African American households, 11.7% of all Asian households, and 18.3% of all Hispanic and Latino households are cost burdened by 30-50%. While 9.0% of all White households, 22.2% of all Black or African American households, 10.6% of all Asian households, 23.1% of all American Indians and Alaskan Natives, and 18.1% of all Hispanic or Latino households. The populations most affected by cost burdens are Black/African American, Hispanic or Latino, and American Indians.

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

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

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

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

Some areas have higher concentrations of minorities than the County as a whole. The following areas have higher percentages of minority residents when compared to the County as a whole according to the 2018-2022 American Community Survey data: Alburtis Borough with 8.5% Black, 6.3% Asian, and 19.38% Hispanic; Catasauqua Borough with 17.43% Hispanic; Coplay Borough with 14.84% Hispanic; Fountain Hill Borough with 34.74% Hispanic; Hanover Township with 9.24% Black and 38.35% Hispanic; Macungie Borough with 7.11% Black and 23.42% Hispanic; Salisbury Township with 7.88% Black and 17.63% Hispanic; Slatington Borough with 15.85%; South Whitehall Township with 9.3% Asian; Upper Macungie Borough with 9.0% Black, 12.0% Asian, and 14.11% Hispanic; and Whitehall Township with 13.26% Black and 20.71% Hispanic.

NA-35 Public Housing – 91.205(b)

Introduction

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

Totals in Use

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

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

Table 21 - Public Housing by Program Type

Data Source: PIC (PIH Information Center)

Characteristics of Residents

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

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

Table 22 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	12	265	1,222	23	1,192	7	0	0

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Black/African American	0	2	21	157	3	151	3	0	0
Asian	0	1	2	15	0	15	0	0	0
American Indian/Alaska Native	0	0	1	4	0	4	0	0	0
Pacific Islander	0	0	0	3	0	3	0	0	0
Other	0	0	0	0	0	0	0	0	0

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

Table 23 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	2	36	272	8	263	1	0	0
Not Hispanic	0	13	253	1,129	18	1,102	9	0	0

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

Table 24 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

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

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

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

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

According to LCHA's 2024 Five Year and Annual Plan, the strategies for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year include preserving quality housing for the very low-income (50% or below AMI) and extremely low-income (30% or below AMI) residents in the County, in addition to expanding housing choices for the elderly, disabled, and Voucher Holders. With public housing occupancy at 90%, and a Housing Authority policy to keep site-based public housing waiting lists open, there is more demand than supply. Also, there is a shortage of availability of Section 8 Vouchers.

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

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

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

LCHA will continue to provide quality affordable housing by preserving, maintaining and promoting the 536 units of public housing and affordable housing. The Authority will work within HUD funding commitments to maximize the number of families assisted by the Housing Choice Voucher Program and other programs. LCHA will continue its commitment to remain a part of local and affordable housing committees where the objective is to seek out methods of expanding affordable housing for seniors, low

income families and individuals with disabilities. LCHA will continue to work with local, county, state and federal government to access programs and continue dialogue to improve programs that provide or have the potential to develop new or preserve existing affordable housing opportunities.

Discussion

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

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

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

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NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

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

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

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

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	150	0	193	0	35	0
Persons in Households with Only Children	7	0	2	7	0	0
Persons in Households with Only Adults	59	144	179	20	0	0
Chronically Homeless Individuals	13	14	22	5	0	0
Chronically Homeless Families	4	0	5	0	6	0
Veterans	2	3	13	0	2	0
Unaccompanied Child	8	0	2	8	0	0
Persons with HIV	3	1	4	0	0	0

Table 256 - Homeless Needs Assessment

Data Source Comments: Eastern PA CoC 2024 Point In Time Count Summary

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Chronically homeless individuals and families – The Chronically Homeless are defined as an individual or family that is homeless and lives or resides in a place not meant for human habitation, a safe haven or in an emergency shelter. They have been homeless and living there continually for at least one year or on at least four separate occasions in the last three years. They have an adult head of household (or a minor head of household if no adult is present in the household) with a diagnosable substance use disorder, serious mental illness, developmental disability (as defined in Section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability, including the co-occurrence or two or more to those conditions. The CoC has PSH beds dedicated for the chronically homeless, and they have adopted a policy to prioritize chronically homeless for PSH beds at turnover. According to the Point-In-Time count data, it was reported that there was 21 chronically homeless persons in 2022, 19 in

2023, and 27 in 2024. There was 1 chronically homeless family with children in 2022, 10 in 2023, and 4 in 2024 in Lehigh County. There has been a substantial decrease in chronically homeless families following the dramatic rise in 2023; however, the number of chronically homeless individuals has risen past 2022 levels. There is a need to continue and expand outreach services for chronically homeless individuals and families to prevent further increases.

Families with children – The Point In Time count for 2024 reported 45 homeless households with children in Lehigh County, for a total of 150 persons. This is a large decrease in the number of homeless families and individuals (64 and 208) in 2023, which was also a decrease in the number of homeless families and individuals (65 and 221) in 2022. The County should continue to provide supportive services to address this number of individuals. Of the homeless in 2024, none were unsheltered. 38 households (130 persons) were in emergency shelters while the remainder were in transitional housing. There is still a need to expand affordable housing options for families in need.

Veterans and their families – The Lehigh Valley Homeless Veteran Task Force was created in February 2015. The Lehigh County Office of Veterans Affairs coordinates the Task Force. The main SSVF provider serving Lehigh and Northampton Counties is Catholic Charities. This is the major resource for rapid re-housing and homelessness prevention. This organization has the financial resources to provide rental assistance immediately to qualifying veterans. Veterans are also linked to agency Support Coordinators by shelters and community resource providers. The Allentown Housing Authority administers the HUD-VASH program for the Lehigh Valley. This program is coordinated through the Wilkes-Barre VA Medical Center. There were 27 homeless veterans in 2022; 7 homeless veterans in 2023; and 5 homeless veterans in 2024. The increase in homeless Veteran in the area shows the need to restore funding for the programs that had previously been successful in addressing veteran homelessness. The decrease in homeless veterans shows the success of organizations to provide supportive services and affordable housing to veterans in Lehigh County.

Unaccompanied youth – Teens aging out of foster care, and young adults in the 18-24 transition stage are sometimes hard to locate. The Eastern PA CoC has aggressively targeted youths experiencing homelessness in response to their prevalence in Lehigh County. Ending homelessness among unaccompanied youth will require increased discharge planning from systems of care, family reunification services, positive youth development, independent living programs, youth-centered strategies, and targeted outreach. There were 24 unaccompanied youths counted in the 2024 Point-in-Time count for Lehigh County, which was an increase from 6 in 2023. 8 of the unaccompanied youths were below the age of 18, while the rest were ages 18-24. This is a significant increase. In 2023 and 2022, there were no unaccompanied minors counted in the PIT. There is a need to provide services and housing options to new adults and unaccompanied minors.

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

The Point-In-Time count for 2024 indicated there were 45 homeless households with children in Lehigh County, for a total of 150 persons. This is a sharp decrease from 2023 and continues a downward trend since 2022. In 2023, there were approximately 64 homeless households (208 persons) with children; and, in 2022, there were 65 homeless households with children for a total of 221 individuals. In 2024, no homeless households with children were unsheltered. 7 families were in transitional housing and the remaining were in emergency shelters. There is a need to expand housing to accommodate 38 households.

The number of homeless veterans in Lehigh County decreased from 27 in 2022, to 7 in 2023, and to 5 in 2024. Lehigh County has successfully reversed the prior increase of homeless veterans. Prior to the 2020 Covid Pandemic, the PIT Count revealed 19 homeless veterans in Lehigh County in 2019. This was part of an increasing trend. The County has decreased the number of homeless veterans to below 2017 estimates (8 individuals).

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

Most individuals and families experiencing homelessness, regardless of race or ethnicity, are suffering from substance abuse problems. There is also a language barrier for non-English speaking individuals and families who need supportive services and housing assistance.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

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

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

The Point-In-Time Count for Lehigh County in 2024 reported a total of 361 homeless persons and 224 homeless households. Of these, 144 persons (118 households), or 40%, were unsheltered. There were 30

persons (16 households) in transitional housing, and 187 persons (90 households) that were housed in emergency shelters. There were 45 homeless families with children, 4 chronically homeless families, 24 unaccompanied youths, and 4 persons with HIV/AIDS were counted in 2024. Of the 361 homeless people counted, 27 were considered chronically homeless, and 13 chronically homeless individuals were sheltered in emergency shelters. There were 5 Veterans (3 unsheltered), 6 with severe mental illness (none were unsheltered), 7 that were chronic substance abusers (6 unsheltered), 32 victims of domestic violence (4 unsheltered), and 26 were considered severely mentally ill with 11 unsheltered.

Discussion:

Not Applicable.

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

Introduction:

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

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

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

Describe the characteristics of special needs populations in your community:

Elderly Persons are defined as persons who are age 65 years and older. According to the 2018-2022 American Community Survey, elderly persons represent 19.0% of the County's total population. Approximately 17.4% (7,547) of the elderly population are age 75 years and older. In addition, roughly 39.4% of the total elderly population lives alone as a single person household (% of the total number of households in the County).

Frail Elderly are those persons who are elderly and have a disability, ranging from a loss of hearing, vision difficulty, cognitive difficulty, ambulatory problems, and lack of self-help skills. It is estimated that approximately 57% of the total elderly population may be classified as frail elderly.

Persons with mental, physical and development disabilities, according to the ACS data for 2018-2022, persons with a disability comprise 4.11% (9,353 persons) of the total population of Lehigh County.

Persons with HIV/AIDS and their families comprise a small percentage of the County's overall population, but they are served by a network of service providers.

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

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

Elderly Persons frequently age in place in Lehigh County and require assistance in both housing and supportive services. The existing housing needs accessibility improvements, and the funding for elderly persons to make such improvements is not always readily available. The Office of Aging & Adult Services provides home delivered meals, housing assistance, and nursing home residency. Meals on Wheels provides meals to elderly residents which can allow seniors to reduce other costs and pay housing costs.

Frail Elderly also frequently age in place in Lehigh County. Frail elderly require additional case work from supportive service organizations, and also require affordable housing. There is a need to provide supportive services and ADA improvements to senior housing to allow individuals to age in place. Many housing units with the necessary ADA improvements are too high in cost for seniors.

Persons with mental, physical and developmental disabilities require supportive services to allow for their equitable participation in housing opportunities. There is a need to provide expanded public transportation services, as well as, provide direct transportation to supportive services for persons with physical and developmental disabilities. Via of the Lehigh Valley operates training programs for disabled children to help them succeed living alone and participating in the community. Substance abuse is common amongst persons with mental health illnesses.

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

Victims of Domestic Violence, dating violence, sexual assault and stalking receive wrap around services from Turning Point of the LV. Turning Point of the LV reported they received around 3,500 calls annually on their hotline and assists 3,300 annually, in the greater Lehigh Valley region. The organization will assist victims of domestic violence with no-cost counseling, legal advocacy, and shelter services. They currently operate a 32 bed shelter in the County. They receive Continuum of Care funding and collaborate with Haven House to provide psychiatric assessments. There is a need to expand to shelter services to accommodate the demand of the organization's services.

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

Not Applicable.

Discussion:

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

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

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

Describe the jurisdiction's need for Public Facilities:

- Many public parks and recreational facilities require more and improved benches and picnic tables for older residents to sit down.
- There is a need to expand bus shelters to increase coverage of public transportation.
- There is a need to install ADA improvements to housing for aging seniors to continue living in their current unit.

How were these needs determined?

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

Describe the jurisdiction's need for Public Improvements:

- Transportation options needs to be expanded county wide to support public transportation and pedestrians. Increase bus routes and drivers to meet demand of County.
- Road reconstruction and improvements are needed. Due to the increase in heavy commercial traffic, road conditions deteriorate much faster than previously.
- Some municipalities reported a need to expand sanitary sewers to rural areas and neighborhoods.

How were these needs determined?

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

Describe the jurisdiction's need for Public Services:

- Many chronic homeless individuals suffer from mental illness and/or substance abuse issues. There is a need to provide greater outreach and more supportive services to these individuals.
- Provide job training and financial management classes to adults and children grades 9 to 12 to expand opportunities.
- There is a need to provide translation services for limited English households who face language barriers in regards to housing.
- Childcare facilities are at capacity due to hiring shortages for teachers and other daycare attendees.

How were these needs determined?

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

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Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

Lehigh County is an urban county in Eastern Pennsylvania with areas ranging from urban to rural. The City of Allentown is the County Seat of Lehigh County and it is the third largest City in the Commonwealth of Pennsylvania. A portion of the City of Bethlehem also lies in Lehigh County, and suburban boroughs and townships located outside of the two cities are located within the County. Lehigh County and Northampton County are the core counties of the Lehigh Valley Region, which is the third largest metropolitan area in the Commonwealth of Pennsylvania and the fastest growing region in the Commonwealth. It is located approximately 100 miles west of New York City and approximately 60 miles north of Philadelphia, and is an attractive exurban community to people who work in either of those larger metropolitan areas. The County and region have many assets, including educational institutions and dense downtowns in the Cities of Allentown, Bethlehem, and Easton (located in Northampton County). Lehigh County's economy was originally based on manufacturing and coal mining. Due to the area's connections to New York and Philadelphia, the region has become attractive to shipping companies and the number of shipping jobs in the area has grown substantially. Migrants from Latin America, mostly from Puerto Rico and the Dominican Republic, have also moved to Lehigh County over the last 20 years. This has led to Lehigh County becoming one of the fastest growing counties in the nation. Its population according to the U.S. Census was 312,090 in 2000, rising to 349,497 in 2010 and 374,557 in 2020 for an overall growth of 12.0% over the last twenty years.

Lehigh County has an estimated 149,876 housing units, according to the 2018-2022 American Community Survey. Of this total, nearly 25% was built in 1939 or earlier, which are aged 85 years or older. Only about 14.5% of the housing was built in the last twenty years, and only 33.6% of the County's housing was built after 1979. (Much of the older 66.4% of housing may have lead-based paint, as it was only banned in 1978.)

According to the 2018-2022 American Community Survey, the County has an estimated 92,474 owner-occupied housing units, with 73,199 (79.2%) of those housing units located outside the City of Allentown. There were 49,686 renter-occupied housing units in the County, with 23,408 (47.1%) located outside the City of Allentown. In the County (excluding Allentown), 35.0% of all housing units are occupied by renters and 65.0% of housing is owner-occupied.

The condition of the housing stock is generally in good condition, but a small percentage of the housing stock is either neglected or not adequately maintained. According to the ACS data for 2013-2017, there are 7,716 vacant housing units in the County, with 4,113 vacant units excluding the City of Allentown. This means that Lehigh County has a vacancy rate of 5.1%, and 4.1% when the City of Allentown is excluded.

The median County-wide home value as of the 2018-2022 ACS was \$254,500, up 26.2% from the 2013-

2017 ACS, and the median contract rent was \$1,259/month for the same time period, up 49.7% from five years prior. This indicates a potentially major affordability issue for low- and moderate-income households.

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

Introduction

According to the 2018-2022 ACS data, there are 149,876 total housing units in Lehigh County. Of these, 142,160 are occupied (92,474 by owner-occupants and 49,686 by renters), leaving 7,716 vacant housing units. 62.4% of the County-wide owner-occupied housing has 2-3 bedrooms, and 36.1% has 4 or more bedrooms. Of renter-occupied households, 29.7% of the housing units have 1 bedroom and 55.8% have 2-3 bedrooms.

All residential properties by number of units

Housing Type	Lehigh County-wide		Lehigh County excluding Allentown	
	Number	%	Number	%
1-unit, detached	70,878	49.86%	59,445	61.53%
1-unit, attached	35,372	24.88%	18,350	18.99%
2 units	5,179	3.64%	2,272	2.35%
3-4 units	6,641	4.67%	2,513	2.60%
5-9 units	6,143	4.32%	3,517	3.64%
10 or more units	15,308	10.77%	7,912	8.19%
Mobile Home, boat, RV, van, etc	2,639	1.86%	2,598	2.69%
Total	142,160	100%	96,607	100%

Table 26 – Residential Properties by Unit Number

Data Source: 2018-2022 ACS

Unit Size by Tenure

Number of Bedrooms	Lehigh County-wide			
	Owners		Renters	
	Number	%	Number	%
No bedroom	228	0.25%	2,778	5.59%
1 bedroom	1,174	1.27%	14,767	29.72%
2 or 3 bedrooms	57,696	62.39%	27,728	55.81%
4 or more bedrooms	33,376	36.09%	4,413	8.88%
Total	92,474	100%	49,686	100%

Table 27 – Unit Size by Tenure

Data Source: 2018-2022 ACS

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

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

- **Public Housing** - There are 289 public housing units located in Lehigh County, all located outside the Cities of Allentown and Bethlehem. The public housing developments are:
 - Seventh Street Village – 25 family units, one-, two-, and three-bedroom apartments and townhouses;
 - George Dillard Manor – 75 one-bedroom elderly units;
 - Coplay Family Units – 25 units;
 - Ridge Manor – 75 elderly units;
 - Clarence Aungst Towers – 75 elderly units; and
 - Fountain Hill Family – 75 Senior units and 14 family units.
- **Low Income Housing Tax Credit (LIHTC)** – According to HUD’s Low-Income Housing Tax Credit Database, there are a total of 1,021 Low Income Housing Tax Credit units in Lehigh County (273 outside of the Cities of Allentown and Bethlehem), of which 812 are considered low-income units.
- **Housing Choice Vouchers** – The Housing Authority administers 1,652 vouchers that are tenant based.

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

There is an insufficient supply of rental housing units of various types within Lehigh County. According to the 2018-2022 ACS, there are 47,611 renter-occupied housing units with a vacancy rate of 3.7. When looking at homeownership supply, the market is extremely tight with a vacancy rate of 0.6. The County only has an estimated 7,716 vacant housing units.

Describe the need for specific types of housing:

The greatest need for residents of Lehigh County is housing for those that are extremely low income (0-30% AMI).

The Valley Housing Development Corporation is currently working to meet the needs of residents of Lehigh County through its expansion. VHDC began in 1983 to take advantage of Low Income Housing Tax Credits (LIHTC). VHDC also works to preserve affordable housing that already exists within the County.

Discussion

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

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

Introduction

The cost of housing has increased from \$191,700 to \$215,400 in the last 11 years for a single-family home. According to RocketHomes.com, the median sale price for a home in the Lehigh County area in May 2024 was \$322,565, a 7.5% year-over-year increase; 57.3% of homes in the County were sold for over the asking price. For the same period, Realtor.com shows the median listing price as \$399,900 and the median sale price as \$333,000, an 8.1% year-over-year increase in median sale price and a 31.9% increase since June 2021.

The cost of rent has increased by 19% during the period from 2009 to 2020. According to the 2018-2022 ACS estimates the rental vacancy rate is 3.7% and the homeowner vacancy rate is 0.6%. These numbers seem to show demand focused on both rental housing and homeownership.

RentCafe.com gives the average rent for the Lehigh Valley as \$1,633/month as of March 2024.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2020	% Change
Median Home Value	191,700	215,400	12%
Median Contract Rent	792	939	19%

Table 28 – Cost of Housing

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	2,627	13.0%
\$500-999	6,982	34.4%
\$1,000-1,499	7,506	37.0%
\$1,500-1,999	2,349	11.6%
\$2,000 or more	774	3.8%
Total	20,238	99.7%

Table 29 - Rent Paid

Data Source: 2016-2020 ACS

Housing Affordability

Number of Units affordable to Households earning:	Renter	Owner
30% HAMFI	959	No Data
50% HAMFI	2,710	2,516

Number of Units affordable to Households earning:	Renter	Owner
80% HAMFI	9,194	12,252
100% HAMFI	No Data	19,953
Total	12,863	34,721

Table 30 – Housing Affordability

Data Source: 2016-2020 CHAS

Monthly Rent, Allentown-Bethlehem-Easton, PA-NJ HUD Metro FMR Area

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	\$972	\$1,137	\$1,426	\$1,821	\$1,900
High HOME Rent	\$972	\$1,137	\$1,417	\$1,628	\$1,796
Low HOME Rent	\$861	\$922	\$1,106	\$1,278	\$1,426

Table 31 – Monthly Rent

Data Source: HUD FY 2024 FMR and HOME Rents

Is there sufficient housing for households at all income levels?

According to the 2016-2020 CHAS data for Lehigh County, the following table lists the number and percent of households by housing costs and race or ethnicity:

Household Types by Race/Ethnicity	Cost Burden of 0-30% AMI		Cost Burden of >30-50% AMI		Cost Burden of >50% AMI		Total Households by Race/Ethnicity	
White non-Hispanic households	40,115	44.0%	8,739	9.6%	6,124	6.7%	55,355	60.7%
Black/African American non-Hispanic households	3,263	3.6%	1,510	1.7%	1,285	1.7%	6,109	6.7%
Asian non-Hispanic households	1,958	2.1%	353	0.4%	384	0.4%	2,714	3.0%
Other race non-Hispanic households	1,168	1.3%	125	0.1%	178	0.2%	1,484	1.6%
Hispanic households (any race)	13,012	14.3%	5,473	6.0%	6,519	1.7%	25,371	27.8%
Total households by Cost Burden	59,571	65.3%	16,220	17.8%	14,545	15.9%	91,215	100%

Data Source: 2016-2020 CHAS

Note: less than 0.1% of the County population claims racial identity as American Indian & Alaska Native or Pacific Islander, so these groups are omitted. 0.5% of the population did not have a cost burden computed. The columns may not sum to 100%.

According to the 2016-2020 CHAS data, 26.9% of all White non-Hispanic households, 45.6% of Black/African American non-Hispanic households, 27.1% of Asian non-Hispanic households, 20.4% of Other Race non-Hispanic households, and 47.3% of Hispanic households of any race are cost burdened by over 30%. While 11.1% of White households, 21.0% of Black households, 14.1% of Asian households, 12.0% of Other Race households, and 25.7% of Hispanic households were severely cost burdened by over 50%. When examining housing problems for households at median income or less, 27.4% of White households, 42.8% of Black/African American households, 32.2% of Asian households, and 42.8% of Hispanic households have a housing problem. Overall, these numbers show that many residents of Lehigh County have a severe housing problem; African American/Black households, Asian households, and Hispanic households in Lehigh County are much more likely to experience a housing problem or a severe housing problem than any other groups.

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

According to the Compare My Rent tool from Rent-O-Meter (<https://comparemy.rent>), it is estimated that the Lehigh County Area Median Rent for an efficiency (studio) apartment is \$1,269, for a one bedroom apartment is \$961 per month, for a two bedroom apartment is \$1,304 per month, for a three bedroom apartment \$1,664 per month, and for a four bedroom apartment \$1,700 per month. The efficiency apartment Area Median Rent (AMR) is higher than the HUD Fair Market Rent and both the Low and High HOME Rents; the three bedroom AMR is higher than the Low and High HOME Rents but lower than the HUD Fair Market Rent; and, the one, two, and four bedroom AMRs are higher than the Low HOME Rent but lower than the HUD Fair Market Rent and High HOME Rent.

Although Area Median Rents are lower than the HOME and Fair Market rents for Lehigh County for some types of units, efficiency and two bedroom units are renting for higher than the HOME and Fair Market rates. Housing affordability is still the biggest housing problem for low-income families and individuals according to the CHAS data, indicating a need for housing subsidies and assistance.

Discussion

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

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

Introduction

At the time of the 2016-2020 ACS Lehigh County had 146,699 total housing units; the 2016-2020 CHAS Data show that 140,070 of these units were occupied either by owners or renters. Lehigh County’s housing stock is relatively old as a whole: 31,975 (22.7%) of occupied units were built before 1940, 56,915 (40.6%) were built before 1960, and 91,260 (66.4%) of the County’s housing units were built prior to 1980. 14,535 housing units built prior to 1980 are occupied by families with children and may pose a lead-based paint risk to those children. Of the occupied housing units in Lehigh County, approximately 1,280 units (0.9%) lack a complete kitchen, plumbing system, or other utilities.

Definitions

The following definitions are used in the table below:

“Selected Housing Conditions:”

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

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

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

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

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	13,445	20%	8,359	41%
With two selected Conditions	88	0%	364	2%
With three selected Conditions	4	0%	110	1%

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With four selected Conditions	0	0%	25	0%
No selected Conditions	53,520	80%	11,450	56%
Total	67,057	100%	20,308	100%

Table 32 - Condition of Units

Data Source: 2016-2020 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied		Total	
	Number	%	Number	%	Number	%
2000 or later	14,585	16.1%	6,275	12.7%	20,860	14.9%
1980-1999	19,750	21.8%	8,205	16.6%	27,955	20.0%
1960-1979	20,250	22.3%	14,095	28.5%	34,345	24.5%
1940-1959	17,820	19.7%	7,300	14.8%	25,120	17.9%
1939 or earlier	18,255	20.1%	13,540	27.4%	31,795	22.7%
Total	90,660	64.7%	49,410	35.3%	140,070	100%

Table 33 – Year Unit Built

Data Source: 2016-2020 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	% of Above	Number	% of Above
Total Number of Units	90,660	64.7%	49,410	35.3%
Total Number of Units Built Before 1980	56,325	62.1%	34,935	70.7%
Housing Units built before 1980 with children present	7,655	13.6%	6,880	19.7%

Table 34 – Risk of Lead-Based Paint

Data Source: 2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present)

Need for Owner and Rental Rehabilitation

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

The older housing stock in areas such as the Borough of Slatington or the Borough of Catasauqua is often in poorer shape than the newer housing stock in the townships. There is a great need for owner and rental housing rehabilitation in these areas. Many workers in the area require affordable housing and

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

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

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

According to the 2016-2020 CHAS data, 34,935 renters (70.7%) live in housing constructed before 1980 and are at risk of lead-based paint, and 56,325 homeowners (62.1%) live in housing constructed before 1980 and face the same risk.

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

Discussion

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

Emergency Management:

Lehigh County consulted with the County Emergency Manager to determine the emergency management needs of the County. Flooding is the primary emergency in Lehigh County, followed by fires, hurricanes, and other natural disasters such as wind or hail damage. Renters in Lehigh County tend to lose the most property in any flood or other emergency because they do not have insurance. There is additional need

for storm sewer separation in the County to mitigate flooding, and there is a need to backfill areas along gravel roads in more rural areas of the County. Each jurisdiction in the region creates its own mitigation strategy that is complemented by the Lehigh Valley Hazard Mitigation Plan should such an emergency occur.

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

Introduction

The Lehigh County Housing Authority (LCHA) is a high performing housing authority that owns and professionally manages family communities and elderly/disabled rental apartments. The apartments are located throughout Lehigh County. LCHA has a total of 289 public housing units. The Housing Authority manages Section 8 Housing Choice Vouchers.

There are a total of 289 public housing units in Lehigh County.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	16	289	1,652	26	1,626	0	849	0
# of accessible units									

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

Table 35 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Public Housing - There are 289 public housing units located in Lehigh County, all located outside the Cities of Allentown and Bethlehem. The public housing developments are:

- Seventh Street Village – 25 family units, one-, two-, and three-bedroom apartments and townhouses;
- George Dillard Manor – 75 one-bedroom elderly units;
- Coplay Family Units – 25 units;
- Ridge Manor – 75 elderly units;
- Clarence Aungst Towers – 75 elderly units; and
- Fountain Hill Family – 75 Senior units and 14 family units.

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

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

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

The Lehigh County Housing Authority submitted its Five Year Plan Update for its FY 2022 through FY 2026 Public Housing Capital Fund Program Grant. The Capital Fund Grant award for FY 2024 was \$645,358. The LCHA proposed various capital activities beyond normal maintenance to improve the overall living environment in the Authority's public housing communities. The activities are as follows:

2022 Fund:

- Replaced siding, doors, frames, and concrete exterior thresholds at 7th Street Village
- Rehabilitated bathrooms, replaced flooring and repaired electrical systems at Cherokee and Delaware Apartments

2023 Fund:

- Replacement of windows and exterior surround at Ridge Manor (multi-year project)

2024 Fund:

- Replacement of windows and exterior surround at Ridge Manor (multi-year project)

2025 Fund:

- Replacement of windows and exterior surround at Ridge Manor (multi-year project)

2026 Fund:

- Replacement of windows and exterior surround at Ridge Manor (multi-year project)
- Replacement of windows at Coplay Family Units

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

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

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

Family Self-Sufficiency (FSS) is a voluntary HUD program that encourages and assists families to become self-sufficient. Anyone currently on the Section 8 Housing Choice Voucher Program is eligible for this program. FSS offers a financial incentive to families through an escrow account, which is based on an increase in a family’s earned income. An example of an increase in earned income would be when a family member has a pay raise, obtains employment or has an increase in his or her working hours that results in an increase in the portion of rent that the family pays each month. For example, if a family member begins working 40 hours per week, and the family’s rent increases 25 dollars per month, that \$25.00 goes into an escrow account that the Housing Authority establishes for the family. This account becomes available to the family when the family successfully completes their FSS Contract of Participation. Depending upon each participant’s situation, the FSS Program can connect tenants with job training, resource planning, credit repair resources, basic skills education, high school equivalency (GED) programs, post-secondary education, and assistance with securing meaningful employment. Advisors provide emotional support, case management, and personalized assistance.

The Housing Authority does not support any other homeownership initiatives.

Discussion:

Lehigh County Housing Authority is the primary provider of housing for the very low- and extremely low-income residents of Lehigh County. The Lehigh County Housing Authority assists individuals and families

through its Public Housing communities, Low Income Housing Tax Credit communities, and Section 8 Housing Choice Vouchers program.

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

Introduction

The Lehigh Valley Regional Homeless Advisory Board (RHAB) implements the CoC’s policies to address homelessness in Lehigh County. It is comprised of various stakeholders from Lehigh and Northampton Counties, including City of Allentown, City of Bethlehem, and County Departments, social service agencies, veterans support groups, faith-based organizations, homeless advocates, and other interested parties. In Lehigh County, Valley Youth House, Turning Point of the Lehigh Valley, Lehigh Valley Conference of Churches, YMCA of Lehigh County, Salvation Army, Catholic Charities, and County service groups provide housing and supportive services for the County’s homeless population and those at risk of homelessness. The Lehigh Valley RHAB’s mission is: “Covering all communities in Lehigh and Northampton Counties, the Lehigh Valley RHAB is a consortium of individuals, agencies and other stakeholders that direct and coordinate community-wide efforts toward ending chronic homelessness.” The Lehigh Valley RHAB absorbed the City of Allentown’s Homelessness Commission in 2015 to better plan services for the homeless from a regional perspective. The following table details the number of available shelter beds by type, according to the Eastern Pennsylvania CoC 2024 Housing Inventory Count (HIC) for the Lehigh Valley RHAB.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Rapid Re-Housing Beds	Transitional Housing Beds	Permanent Supportive Housing	Other Permanent Housing
	Year Round Beds	Voucher / Seasonal / Overflow Beds				
Households with Adult(s) and Child(ren)	238	146	162	119	73	20
Households with Only Adults	105	n/a	27	77	173	67
Chronically Homeless Households	n/a	n/a	n/a	n/a	168	n/a
Veterans	n/a	n/a	12	13	78	n/a
Unaccompanied Youth	12	n/a	6	16	0	n/a
Total	355	146	189	196	246	87

Table 36 - Facilities and Housing Targeted to Homeless Households

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

Introduction

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

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

Hospitals and state institutional facilities must have written discharge policies for "appropriate referral and transfer plans" including evaluation of a patient's capacity for self-care and possibility of being cared for in "the environment from which s/he entered the hospital." The actual discharge varies with the individual being discharged, their primary and behavioral health needs, and resources and supports available. While institutions try to send individuals home or to family, sometimes they discharge to a nursing home, rehab hospital or as last resort, non-HUD funded shelter. Some shelters have protocols against accepting certain individuals directly from a hospital. Plans are coordinated with foster care, health care, mental health care, and correctional facilities. The CoC conducts additional discharge planning for youth exiting systems of care to adhere to its strategy of preventing youth homelessness.

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

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

Need: The County is experiencing an increase in the number of persons aging in place, elderly, persons with physical disabilities, developmentally delayed persons, etc. There is a need to improve living standards for persons with special needs by increasing and expanding public services and public facilities.

Goals:

- **SN-1 Housing** – Increase the number of decent, safe, sound, sanitary, accessible and affordable units in the County both for the elderly, persons with disabilities, and other special need a populations.
- **SN-2 Accessibility** – Provide funds for improvements to owner-occupied housing and improve renter-occupied housing by making reasonable accommodations for the physically disabled.

- **SN-3 Social Services** – Promote and support social service programs and facilities for all persons with special needs.
- **SN-4 Removal of Architectural Barriers** – Remove Architectural Barriers which restrict the mobility and access to public facilities and services for persons with physical disabilities.
- **SN-5 Transportation** – Provide funds for improving and expanding transportation and access services for the elderly, persons with disabilities, and persons with other special needs.

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

Not Applicable.

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

Negative Effects of Public Policies on Affordable Housing and Residential Investment

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

Impediment 1: Lack of Affordable Housing - There is a lack of affordable housing in Lehigh County due to the influx in the number of unskilled and semi-skilled workers who have moved into the County, which has created a high demand and a corresponding increase in the cost of rental and sales housing.

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

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

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

Impediment 2: Lack of Accessible Housing - There is a lack of accessible housing in Lehigh County since the supply of accessible housing has not kept pace with the demand caused by the increase in the percentage of elderly persons in Lehigh County and more disabled persons desiring to live independently.

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

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

- **2-A:** Continue to promote the need for accessible housing by supporting and encouraging private developers and non-profits to develop, construct, and/or rehabilitate housing that is accessible to persons who are disabled.

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

Impediment 3: Barriers Limiting Housing Choice - There are physical, economic, and social barriers in Lehigh County which limit housing choices and housing opportunities for low-income households, minorities, and the disabled members of the County's population.

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

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

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

Impediment 4: Lack of Housing Awareness - There is a lack of knowledge and understanding concerning the rights of individuals, families, and members of the protected classes in regard to the Fair Housing Act (FHA) and awareness of discriminatory practices.

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