FY 2020 ANNUAL ACTION PLAN
U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

FOR DISPLAY

DEPARTMENT OF COMMUNITY AND ECONOMIC DEVELOPMENT (DCED)
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Executive Summary

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

1. Introduction

Northampton County is an entitlement community under the U.S. Department of Housing and Urban Development’s (HUD) Community Development Block Grant Program (CDBG) and HOME Investment Partnerships Program (HOME).

The Community Development Block Grant (CDBG) Entitlement Program provides annual grants on a formula basis to entitled cities and counties to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons. The program is authorized under Title I of the Housing and Community Development Act of 1974, Public Law 93-383, as amended; 42 U.S.C.-530.1 et seq. (Source: https://www.hudexchange.info/programs/cdbg-entitlement)

The HOME Investment Partnerships Program (HOME) provides formula grants to states and localities that communities use - often in partnership with local nonprofit groups - to fund a wide range of activities including building, buying, and/or rehabilitating affordable housing for rent or homeownership or providing direct rental assistance to low-income people. It is the largest Federal block grant to state and local governments designed exclusively to create affordable housing for low-income households. (Source: https://www.hudexchange.info/programs/home)

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the McKinney-Vento Homeless Assistance Act, revising the Emergency Shelter Grants Program in significant ways and renaming it the Emergency Solutions Grants (ESG) program. The ESG Interim Rule took effect on January 4, 2012. The change in the program’s name, from Emergency Shelter Grants to Emergency Solutions Grants, reflects the change in the program’s focus from addressing the needs of homeless people in emergency or transitional shelters to assisting people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. (Source: https://www.hudexchange.info/programs/esg)

In compliance with HUD regulations, the County must annually prepare an Annual Action Plan to address how the County will use CDBG, HOME, and ESG funds to address its affordable housing, community development, economic development, and strategic planning needs identified in the FY 2019-2023 Five Year Consolidated Plan. To complete the CDBG, HOME, and ESG program year, the County reports annually on the progress it has made toward its Consolidated Plan goals in the Consolidated Annual Performance and Evaluation Report (CAPER). Northampton County prepared its Five Year Consolidated Plan covering the period of FY 2019, beginning October 1, 2019, through FY 2023, ending September 30, 2024.

During the FY 2018, Northampton requalified for entitlement status as an urban county for FYs 2019-2021. The County is comprised of thirty-eight (38) municipalities, which includes two (2) cities, nineteen (19) boroughs, and seventeen (17) townships. All jurisdictions are members of the urban county entitlement program except for the City of Bethlehem, which is a federal CDBG and HOME entitlement community. The City of Easton, a previous federal CDBG entitlement community, and Northampton County entered
into a cooperation agreement on 8/16/2018 that recognized the City's decision to opt in as an urban county participant. As such, the Consolidated Plan is the responsibility of Northampton County and covers both entities.

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

Overview

The concept of the Consolidated Plan is to serve as a strategic planning document for the County to make data based, market driven, housing and community development plans. Northampton County’s FY 2019-2023 Five Year Consolidated Plan proposes the following six (6) strategies to address the priority needs throughout the County:

Housing Strategy –

Priority Need: There is a need for decent, safe and sanitary housing that is affordable and accessible to homebuyers, homeowners and renters.

Goals:
- HS-1 Housing Support – Assist low- and moderate-income households to access decent, safe and sanitary housing that is affordable and accessible for rent or for sale through housing counseling, down payment and closing cost assistance.
- HS-2 Housing Construction – Encourage the construction of new affordable housing units throughout the County for both owners and renters.
- HS-3 Housing Rehabilitation – Conserve and rehabilitate existing affordable housing units occupied by owners and renters in the County by addressing code violations, emergency repairs and handicap accessibility.

Homeless Strategy –

Priority Need: There is a need for housing for homeless persons and persons at-risk of becoming homeless.

Goals:
- HO-1 Housing – Support the Continuum of Care's efforts to provide emergency shelter, transitional housing, rapid rehousing, utility support, permanent supportive housing, and other permanent housing opportunities.
- HO-2 Operation/Support – Assist housing providers who operate or provide housing support services for the homeless and persons or families at-risk of becoming homeless.

Other Special Needs Strategy –

Priority Need: There is a need for housing, services, and facilities for persons with special needs.

Goals:
- SN-1 Housing – Support an increase in the supply of decent, safe and sanitary housing that is affordable and accessible for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs, through rehabilitation of existing buildings and new construction of housing.
• SN-2 Social Services – Support social service programs and facilities for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs.

Community Development Strategy –

Priority Need: There is a need to improve the community facilities, infrastructure, public services, and quality of life in the County.

Goals:
• CD-1 Community Facilities and Infrastructure – Improve the County’s public facilities and infrastructure through rehabilitation, reconstruction, and new construction.
• CD-2 Public Safety and Services – Improve and enhance public safety, public services, and public programs.
• CD-3 Connectivity – Improve connectivity throughout the County and surrounding municipalities through physical, visual, transportation, and accessibility improvements.
• CD-4 Clearance/Demolition – Remove and eliminate slum and blighting conditions throughout the County.

Economic Development Strategy –

Priority Need: There is a need to encourage employment and to promote economic opportunities in the County.

Goals:
• ED-1 Employment – Support and encourage job creation, job retention, and job training opportunities.
• ED-2 Development – Support business and commercial growth through expansion and new development.
• ED-3 Redevelopment – Plan and promote the development, redevelopment, and revitalization of vacant commercial and industrial sites and buildings.
• ED-4 Financial Assistance – Support and encourage new economic development through local, state, and federal tax incentives and programs such as: Tax Incremental Financing (TIF); Tax Abatement (LERTA); Payment in Lieu of Taxes (Pilot); Enterprise Zones/Entitlement Communities; Section 108 Loan Guarantees; Economic Development Initiative (EDI) funds; etc.
• ED-5 Access to Transportation – Support the expansion of public transportation and access to bus and automobile service to assist the transportation needs for employment and job training opportunities.

Administration, Planning, and Management Strategy –

Priority Need: There is a need for planning, administration, management, and oversight of federal, state, and local funded programs.

Goals:
• AM-1 Overall Coordination – Provide program management and oversight for the successful administration of federal, state, and local funded programs, including planning services for special
studies, environmental clearance, fair housing activities, and compliance with all federal, state, and local laws and regulations.

3. Evaluation of past performance

Annually, Northampton County prepares its Consolidated Annual Performance Evaluation Report (CAPER). This report is submitted within ninety (90) days after the start of the new program year. Copies of previous program year CAPERs are available for review at the County’s Department of Community and Economic Development Office.

The FY 2017 CAPER, which was the sixth CAPER for the FY 2012-2016 Five Year Consolidated Plan, was approved by HUD in a letter dated March 29, 2019. In the FY 2019 CAPER, the County expended 100% of its CDBG funds to benefit low- and moderate-income persons. The County expended 15% of its funds during the FY 2016 CAPER period on public service, which complies with the 15% regulatory cap. The County committed 20% of its funds during this CAPER period on Planning and Administration, which complies with the 20% regulatory cap. The County’s expenditure ratio at the end of the FY 2017 CAPER period was 1.43, which is below the 1.5 expenditure ratio maximum.

The County did not make any changes to its Five Year Priorities and Goals during the previous plan year. The County amended its FY 2019 Annual Action Plan to incorporate CDBG-CV and ESG-CV funding provided through the CARES Act of 2020 in response to the COVID-19 Pandemic.

4. Summary of citizen participation process and consultation process

Northampton County prepared the Consolidated Plan and Annual Action Plan in compliance with the County’s Citizen Participation Plan. The County held one (1) Needs Public Hearing virtually on December 17, 2020. The public hearing provided residents, agencies and organizations with the opportunity to discuss the County's CDBG and HOME programs and to provide suggestions for FY 2020 funding priorities. The Needs Public Hearing advertisement was published in The Express Times on December 10, 2020. Additionally, the County requested funding applications from urban county consortium members and county stakeholders for projects to address the housing and community development needs of the County.

A “draft” of the FY 2020 Annual Action Plan was placed on public display at the following locations for review:

- County of Northampton Department of Community & Economic Development - County of Northampton Human Services Building 2801 Emrick Blvd, Bethlehem, PA 18020Bangor Public Library 39 S. Main Street, Bangor, PA, 18013
- County of Northampton website (www.northamptoncounty.org) Government section of the website under "Community and Economic Development"

A newspaper notice announcing that the "draft" plans were available for review was published in The Express Times, the newspaper of general circulation in the area, on January 14, 2021. The “draft” plans were on display for a period of 7-days, as per HUD COVID-19 waivers, starting on January 14, 2021 and ended on January 21, 2021.
The Second Public Hearing was held on January 21, 2021 to discuss the proposed plans. Upon completion of the 7-day comment period, the County submitted the plans to the County Council for approval to submit the application to HUD. The County passed a resolution on January 21, 2021 approving the submission of the Consolidated Plan and Annual Action to HUD. The plans were electronically submitted through HUD’s online IDIS system on January 28, 2021.

For additional information on the citizen participation and consultation process, please refer to Sections PR-10 and PR-15, as well as the Citizen Participation attachment.

5. Summary of public comments

The County held one (1) Needs Public Hearing on December 17, 2021. No comments were received. The County held its Second Public Hearing on January 21, 2021. At the hearing no questions or comments were received.

Additionally, the County requested urban county consortium members to submit funding applications for CDBG, HOME, and ESG eligible projects. The following needs and priorities were determined from the applications:

- Need for affordable housing
- Need for housing rehabilitation assistance
- Need for integrated housing and supportive services
- Need for infrastructure improvements
- Need for public facility improvements

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

All comments and suggestions were incorporated into this plan.

7. Summary

The overall goal of the Five Year Consolidated Plan is to improve the living conditions for all residents in Northampton County, to create a suitable and sustainable living environment, and to address the housing and community development needs of the County. The Five Year Consolidated Planning process obligates the County to state in a single document its strategy to pursue goals for all housing, community development, and planning programs. The County will use the Consolidated Plan’s goals and strategies to allocate CDBG and HOME funds over the next five (5) years, as well as provide direction to partners addressing the housing and community development needs of low- and moderate-income persons. HUD will evaluate the County’s performance under the Five Year Consolidated Plan against these goals.

The following demographic maps are included at the end of this section:

1. Percent White Population by Block Group
2. Percent Minority Population by Block Group
3. Percent Population Age 65 and Over by Block Group
4. Housing Density by Block Group
5. Percent Owner Occupied Housing Units by Block Group
6. Percent Renter Occupied Housing Units by Block Group
7. Low- and Moderate-Income Percentage by Block Group
8. Low- and Moderate-Income and Minority Percentage by Block Group
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 Annual Action Plan and those responsible for administration of each grant program and funding source.

<table>
<thead>
<tr>
<th>Agency Role</th>
<th>Name</th>
<th>Department/Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead Agency</td>
<td>NORTHAMPTON COUNTY</td>
<td>Department of Community and Economic Development</td>
</tr>
<tr>
<td>CDBG Administrator</td>
<td>NORTHAMPTON COUNTY</td>
<td>Department of Community and Economic Development</td>
</tr>
<tr>
<td>HOME Administrator</td>
<td>NORTHAMPTON COUNTY</td>
<td>Department of Community and Economic Development</td>
</tr>
<tr>
<td>ESG Administrator</td>
<td>NORTHAMPTON COUNTY</td>
<td>Department of Community and Economic Development</td>
</tr>
</tbody>
</table>

Table 1 – Responsible Agencies

Narrative

Northampton County’s Department of Community and Economic Development (DCED) is the administering agency for the CDBG, HOME, and ESG programs. The Department prepares the Five Year Consolidated Plans, Annual Action Plans, Environmental Review Records (ERR’s), and the Consolidated Annual Performance Evaluation Reports (CAPER), as well as manages monitoring, voucher payments, contracting, and oversight of the programs on a day to day basis. In addition, the County has a private planning consulting firm available to assist the Department on an as needed basis.

Consolidated Plan Public Contact Information

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fbrooks@northamptoncounty.org
1. Introduction

To develop the FY 2020 Annual Action Plan, Northampton County consulted with public and private agencies and organizations that provide assisted housing, health services, and social services (including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons), community-based and regionally-based organizations that represent protected class members, and organizations that enforce fair housing laws. The County also consulted with local units of government in and around the County, as well as County residents. Input from the meetings and consultations were used to establish the priority needs and strategies to be addressed with CDBG, HOME, and ESG funds.

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

The County's Department of Community and Economic Development acts as the single point of contact to coordinate efforts between public and assisted housing providers, as well as private and governmental health, mental health, and social service agencies. The County works with the following agencies to enhance funding and service allocations to address the housing and community development needs of the area:

- Northampton County Department of Community and Economic Development - oversees the CDBG program and administers competitive HOME grants
- Northampton County Department of Human Services - provides care and protection to County residents from infancy to old age, through consumer-focused programs designed to maintain and improve the quality of life for consumers and their families
- Northampton County Housing Authority and Easton Housing Authority - manage the Public Housing and Section 8 Housing Choice Voucher Program, create improvements to public housing communities, and develop affordable housing
- Social Services Agencies - provides services to address the needs of low- and moderate-income persons
- Housing Providers - rehabilitates and develops affordable housing for low- and moderate-income families and individuals
- Lehigh Valley RHAB CoC - oversees the Continuum of Care Network for Lehigh County and Northampton County

Coordination with these entities will continue throughout the Five Year Consolidated Plan period in order to capitalize on potential future funding opportunities, as well as potential project partnerships, that would result in increased benefits to low- and moderate-income households and persons.

Each year as part of the application planning process, local jurisdictions, agencies, and organizations are invited to submit proposals for CDBG, HOME, and ESG funds for eligible activities. These groups participate in the planning process by attending the public hearings, informational meetings, and through DCED electronic updates. These groups are notified through the County's DCED network of upcoming meetings and funding opportunities. Also, the staff of the DCED have proactively been participating in additional
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

Northampton 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). The 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 supportive services to the homeless and those at risk of homelessness.

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 (SVF) 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).

The Lehigh Valley RHAB Co-Chairs are currently representatives of the Community Action Committee of the Lehigh Valley in Bethlehem, PA, (which is located partly in Lehigh County and partly in Northampton County), and the Third Street Alliance in Easton, PA, which is located in Northampton County. The LV-RHAB has representation from multiple interest groups including: CDBG Jurisdictions, Public Housing Authorities, domestic violence service providers, Veterans, youth service providers, Community Action Partnerships, homeless service providers, and faith-based organizations.

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 develops priorities, target populations, outcome measures, and evaluation processes for ESG under HEARTH, including prioritizing Rapid ReHousing (RRH). The CoC decides on ESG funding ranking 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 the 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. An ESG Committee, also composed of CoC members, was formed to help in setting ESG policy/performance standards. Data Committee findings will inform the ESG Committee and aid them in establishing standards.

The CoC and the HMIS 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 has increased the bed coverage percentage in HMIS; the bed coverage rate was reported as 70.17% in 2017 and 70.72% in 2018. Approximately 65.55% of Emergency Shelter beds are reported on HMIS in 2018, which is up from 50.06% in 2017. Projects not on HMIS include twenty-eight (28) Domestic Violence projects, because Domestic Violence projects are prohibited from participating, and another seventy (70) projects that do not enter data into HMIS. In total, there are 233 projects listed on the CoC’s Housing Inventory Chart. Reporting for Transitional Housing beds has decreased from 76.2% in 2017 to only 59.97% in 2018. There is a high rate of HMIS coverage for Permanent Supportive Housing beds, with 68.76% on HMIS, as well as 100% of Runaway & Homeless Youth Program funded projects. However, there are zero VASH beds being reported. 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 regards to VASH, the CoC built a new bed/voucher-based process within the CoC’s HMIS and will begin piloting this enhancement with Public Housing Authorities.

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

The following consultations were made during the planning process:

- Northampton County staff
- City of Allentown staff
- City of Bethlehem staff
- City of Easton staff
- Northampton County Housing Authority
- City of Allentown Housing Authority
- City of Bethlehem Housing Authority
- City of Easton Housing Authority

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

All stakeholders were contacted multiple times to consult on the Consolidated Plan, as well as being notified of public hearings and of the Plan’s draft display period. Some stakeholders did not provide written or oral responses after being contacted.
Other local/regional/state/federal planning efforts considered when preparing the Plan

<table>
<thead>
<tr>
<th>Name of Plan</th>
<th>Lead Organization</th>
<th>How do the goals of your Strategic Plan overlap with the goals of each plan?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Continuum of Care</td>
<td>Lehigh Valley Regional Homeless Advisory Board</td>
<td>The goals of the County and the CoC are complementary.</td>
</tr>
<tr>
<td>Annual and Five Year Capital Plans</td>
<td>Northampton County Housing Authority</td>
<td>The goals of the County and PHA are complementary.</td>
</tr>
<tr>
<td>Annual and Five Year Capital Plans</td>
<td>Easton Housing Authority</td>
<td>The goals of the County and PHA are complementary.</td>
</tr>
<tr>
<td>Lehigh Valley Comprehensive Plan</td>
<td>Lehigh valley Planning Commission</td>
<td>The goals of the County and the Planning Commission are complementary.</td>
</tr>
</tbody>
</table>

Table 2 – 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(l))

Northampton County’s Department of Community and Economic Development is the lead agency for the CDBG, HOME, and ESG programs. Close coordination is maintained with other County departments such as the Executive, Human Services, and Public Works. The County has developed partnerships with the cities of Allentown, Bethlehem, and Easton’s Departments of Community and Economic Development to jointly address the regional housing and community development needs shared between the jurisdictions. The County actively engages the thirty-eight (38) jurisdictions that comprise the County, which include two (2) cities, nineteen (19) boroughs, and seventeen (17) townships. The County works closely with the Northampton Housing Authority and through the City of Easton, the Easton Housing Authority, to address the housing needs of lower income residents. Through the CoC, the County is in consultation with the Commonwealth concerning homeless needs.

Narrative (optional):

The vision of Northampton County’s Five Year Consolidated Plan seeks to develop a viable community by promoting integrated approaches that provide decent housing, a suitable living environment, and expand economic opportunities for low- and moderate-income persons. The primary means towards this end is the development of partnerships among all levels of government and the private sector, including for-profit and non-profit organizations.

Consultations included the following stakeholders:

- Housing Services and Assisted Housing
- Health Services
- Social and Fair Housing Services
- Continuum of Care
• Public and Private Agencies that address housing, health, social service, victim services, employment, and education needs
• Publicly Funded Institutions and Systems of Care that may discharge persons into homelessness
• Corrections Institutions
• Business and Civic Leaders
• Child Welfare Agencies concerned with lead poisoning
• Adjacent Units of general Local Government and Regional Government Agencies
• Broadband Internet Service Providers
• Natural Hazard Risk Assessors

Consultation with persons, especially low-income persons, living in areas designated by the local jurisdiction as a revitalization area, areas designated by either a local jurisdiction or as a slum and blighted area and areas where CDBG funds are proposed to be used.

The County prioritizes CDBG projects located in Census Tracts and Block Groups that are supported by LMI Census data countywide. The County has not designated any revitalization or blighted areas. Meetings, communications, and announcements are directed at these areas in the County to consult and educate the LMI population of their housing and community development needs. Additionally, consultations with stakeholders that serve the LMA eligible areas were consulted on the prioritization of CDBG funding.

Consultation with residents of public and assisted housing developments (including any resident advisory boards, resident councils, and resident management corporations).

The County Executive works closely with the Housing Authority’s board to address the County’s lower income housing needs. The Housing Authority Board meets monthly with residents and housing authority administration to discuss their housing needs. These needs have been shared with the County’s Department of Community and Economic Development. The Departments of Community and Economic Development and Human Services applied for HUD Mainstream Vouchers in response to the need for additional housing for individuals with disabilities. Caseworks from the County’s Area Agencies on Aging shared interactions with seniors concerning their housing and community development needs.
PR-15 Citizen Participation

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

Northampton County prepared the Consolidated Plan and Annual Action Plan in compliance with the County's Citizen Participation Plan. The County held one (1) Needs Public Hearing virtually on December 17, 2020. The public hearing provided residents, agencies and organizations with the opportunity to discuss the County's CDBG and HOME programs and to provide suggestions for FY 2020 funding priorities. No comments were received. The Needs Public Hearing advertisement was published in The Express Times on December 10, 2020. Additionally, the County requested funding applications from urban county consortium members and county stakeholders for projects to address the housing and community development needs of the County.

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Annual Action Plan

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

Introduction

Northampton County will receive a Community Development Block Grant (CDBG) in the amount of $2,212,043, a HOME Investment Partnerships Grant (HOME) in the amount of $647,111, and Federal Emergency Solutions Grant (ESG) in the amount of $184,798 for the FY 2020 Program Year. The County does not expect to receive any Program Income during the FY 2020 Annual Action Plan period. The County’s FY 2020 CDBG program year starts on October 1, 2020 and concludes on September 30, 2021. This is the second year that the City of Easton will be included as a member of the County’s Urban County Entitlement status. The inclusion of the City of Easton in the Urban County allowed the joint jurisdictional entitlement to qualify for HUD HOME and ESG funds.

The following financial resources are identified for the FY 2020 Annual Action Plan and will be used to address the following needs: Housing Needs; Homeless Needs; Other Special Needs; Community Development; Economic Development Needs; and Administration, Planning, and Management Needs. The accomplishments of these projects/activities will be reported in the FY 2020 Consolidated Annual Performance and Evaluation Report (CAPER).
<table>
<thead>
<tr>
<th>Program</th>
<th>Source of Funds</th>
<th>Uses of Funds</th>
<th>Expected Amount Available Year 1</th>
<th>Narrative Description</th>
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<td></td>
<td></td>
<td></td>
<td><strong>Annual Allocation:</strong> $</td>
<td><strong>Program Income:</strong> $</td>
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<td><strong>HOME</strong></td>
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The CDBG entitlement program allocates annual grants to larger cities and urban counties to develop viable communities by providing decent housing, a suitable living environment, and opportunities to expand economic opportunities, principally for low- and moderate-income persons. The County is funding thirty-two (32) CDBG projects in FY 2020.

The HOME entitlement program allocates annual grants to larger cities and urban counties to fund a wide range of activities including building, buying, and/or rehabilitating affordable housing for rent or homeownership or providing direct rental assistance to low-and moderate-income people. The County is funding six (6) HOME projects in FY 2020.
Table 3 - Expected Resources – Priority Table

<table>
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<tr>
<th>ESG</th>
<th>public - federal</th>
<th>Homeless</th>
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</thead>
</table>

The ESG entitlement program allocates annual grants to programs that focus from addressing the needs of homeless people in emergency or transitional shelters to assisting people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. The County is funding one (1) ESG project in FY 2020.

**Table 3 - Expected Resources – Priority Table**

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

The County has the following grants available to complement the CDBG/HOME program funds:
- HUD Lead Grant
- PA PHARE Housing Grant

The County has applied for the following funds to complement its proposed CDBG funding:
- PA PHARE Housing Grant

CDBG/HOME subrecipients are encouraged to leverage additional resources (such as private, state and local funds) for projects. Subrecipients are required to submit matching fund sources in the subrecipient contracts. The County assists sub grantees to match federal grants with the following private, state and other funds:
- Low-Income Housing Tax Credit Program (LIHTC)
- Pennsylvania Housing Finance Agency (PFHA)
- HUD Section 202 Housing for the Elderly
- HUD Section 811 Housing for the Disabled
• Section 8 Rental Assistance Program
• Shelter Plus Care Pennsylvania Department of Community and Economic Development (DCED)
• Federal Home Loan Bank (FHLB)
• Financial Institutions – Several local financial institutions have developed flexible underwriting criteria to encourage homeownership
If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The County is not proposing to use publicly owned land or property located within the jurisdiction to address the needs identified in the plan.

Discussion

The CDBG/HOME program year runs from October 1, 2020 through September 30, 2021. The CDBG/HOME/ESG funds will be used to address the following priority needs:

- Housing Needs
- Homeless Needs
- Other Special Needs
- Community Development Needs
- Economic Development Needs
- Administration, Planning, and Management Needs
## AP-20 Annual Goals and Objectives

### Goals Summary Information

<table>
<thead>
<tr>
<th>Category</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>AM-1 Overall Coordination</td>
<td>Provide program management and oversight for the successful administration of federal, state, and local funded programs, including planning services for special studies, environmental clearance, fair housing activities, and compliance with all federal, state, and local laws and regulations.</td>
</tr>
<tr>
<td>CD-1 Community Facilities and Infrastructure</td>
<td>Improve the County’s public facilities and infrastructure through rehabilitation, reconstruction, and new construction.</td>
</tr>
<tr>
<td>CD-2 Public Safety and Services</td>
<td>Improve and enhance public safety, public services, and public programs.</td>
</tr>
<tr>
<td>CD-3 Connectivity</td>
<td>Improve connectivity throughout the County and surrounding municipalities through physical, visual, transportation, and accessibility improvements.</td>
</tr>
<tr>
<td>CD-4 Clearance/Demolition</td>
<td>Remove and eliminate slum and blighting conditions throughout the County.</td>
</tr>
<tr>
<td>ED-1 Employment</td>
<td>Support and encourage job creation, job retention, and job training opportunities.</td>
</tr>
<tr>
<td>ED-4 Financial Assistance – Support and encourage new economic development through local, state, and federal tax incentives and programs such as: Tax Incremental Financing (TIF); Tax Abatement (LERTA); Payment in Lieu of Taxes (Pilot); Enterprise Zones/Entitlement Communities; Section 108 Loan Guarantees; Economic Development Initiative (EDI) funds; etc.</td>
<td></td>
</tr>
<tr>
<td>---</td>
<td></td>
</tr>
<tr>
<td>HO-1 Housing – Support the Continuum of Care's efforts to provide emergency shelter, transitional housing, rapid rehousing, utility support, permanent supportive housing, and other permanent housing opportunities.</td>
<td></td>
</tr>
<tr>
<td>HO-2 Operation/Support – Assist housing providers who operate or provide housing support services for the homeless and persons or families at-risk of becoming homeless.</td>
<td></td>
</tr>
<tr>
<td>HS-1 Housing Support – Assist low- and moderate-income households to access decent, safe and sanitary housing that is affordable and accessible for rent or for sale through housing counseling, down payment and closing cost assistance.</td>
<td></td>
</tr>
<tr>
<td>HS-3 Housing Rehabilitation – Conserve and rehabilitate existing affordable housing units occupied by owners and renters in the County by addressing code violations, emergency repairs and handicap accessibility.</td>
<td></td>
</tr>
<tr>
<td>SN-2 Social Services – Support social service programs and facilities for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs.</td>
<td></td>
</tr>
</tbody>
</table>

**Table 4 – Goals Summary**
AP-35 Projects – 91.220(d)

Introduction

In order to address the priority needs identified in the Northampton County Consolidated Plan, the proposed FY 2020 Annual Action Plan proposes the following activities:

Projects

<table>
<thead>
<tr>
<th>Project</th>
<th>Amount</th>
<th>Source</th>
<th>Goal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Easton DPW - Reconstruction of Sanitary Sewer Lines</td>
<td>$67,500</td>
<td>CDBG</td>
<td>CD-3</td>
</tr>
<tr>
<td>Easton DPW - Road Reconstruction Program</td>
<td>$100,000</td>
<td>CDBG</td>
<td>CD-3</td>
</tr>
<tr>
<td>Lower Mount Bethel Township - ADA Restroom Project</td>
<td>$45,750</td>
<td>CDBG</td>
<td>CD-1</td>
</tr>
<tr>
<td>Hellertown Borough - Authority Park ADA Restrooms</td>
<td>$80,000</td>
<td>CDBG</td>
<td>CD-1</td>
</tr>
<tr>
<td>Bangor Borough - Admin Building Ramp/ADA Access Improvements</td>
<td>$20,400</td>
<td>CDBG</td>
<td>CD-1</td>
</tr>
<tr>
<td>Bangor Borough - Road, ADA Ramp, and Infrastructure Improvements</td>
<td>$70,000</td>
<td>CDBG</td>
<td>CD-2</td>
</tr>
<tr>
<td>Easton Redevelopment Authority - Property Acquisition and Rehabilitation</td>
<td>$155,000</td>
<td>CDBG</td>
<td>CD-1</td>
</tr>
<tr>
<td>Northampton Borough - ADA Access for 10 Street Intersections</td>
<td>$90,000</td>
<td>CDBG</td>
<td>CD-3</td>
</tr>
<tr>
<td>Lower Nazareth Township - Senior Center Parking Lot Repavement</td>
<td>$22,704</td>
<td>CDBG</td>
<td>CD-3</td>
</tr>
<tr>
<td>Easton Community Center - HVAC System Repair</td>
<td>$26,000</td>
<td>CDBG</td>
<td>CD-3</td>
</tr>
<tr>
<td>Wilson Borough - Road Resurfacing/Rehabilitation</td>
<td>$175,000</td>
<td>CDBG</td>
<td>CD-2</td>
</tr>
<tr>
<td>Northampton County Housing Authority - Senior Center Improvements</td>
<td>$36,000</td>
<td>CDBG</td>
<td>CD-1</td>
</tr>
<tr>
<td>East Bangor - Road Improvements</td>
<td>$65,000</td>
<td>CDBG</td>
<td>CD-1</td>
</tr>
<tr>
<td>Third Street Alliance - Façade Repair</td>
<td>$50,000</td>
<td>CDBG</td>
<td>HO-1</td>
</tr>
<tr>
<td>Washington Township - ADA Park Improvements</td>
<td>$40,000</td>
<td>CDBG</td>
<td>HO-1</td>
</tr>
<tr>
<td>Shiloh Winter Homeless Shelter Improvements - ADA Restroom Improvements</td>
<td>$50,000</td>
<td>CDBG</td>
<td>CD-1</td>
</tr>
<tr>
<td>Project Description</td>
<td>Amount</td>
<td>Program</td>
<td>Code</td>
</tr>
<tr>
<td>-----------------------------------------------------------------------------------</td>
<td>----------</td>
<td>---------</td>
<td>------</td>
</tr>
<tr>
<td>Easton Redevelopment Authority - Program Administration</td>
<td>$140,000</td>
<td>CDBG</td>
<td>CD-1</td>
</tr>
<tr>
<td>Easton Fire Study</td>
<td>$35,000</td>
<td>CDBG</td>
<td>CD-1</td>
</tr>
<tr>
<td>Northampton County Administration - Program Administration</td>
<td>$267,189</td>
<td>CDBG</td>
<td>CD-1</td>
</tr>
<tr>
<td>Easton Disposition</td>
<td>$20,000</td>
<td>CDBG</td>
<td>CD-2</td>
</tr>
<tr>
<td>Easton Payment of Section 108 Loan</td>
<td>$77,000</td>
<td>CDBG</td>
<td>AM-1</td>
</tr>
<tr>
<td>Easton Code Enforcement - Rental Inspection Program</td>
<td>$120,000</td>
<td>CDBG</td>
<td>ED-4</td>
</tr>
<tr>
<td>Northampton County Home Improvement Program</td>
<td>$170,000</td>
<td>CDBG</td>
<td>AM-1</td>
</tr>
<tr>
<td>Greater Shiloh Church - Development of Housing Staff</td>
<td>$45,000</td>
<td>CDBG</td>
<td>AM-1</td>
</tr>
<tr>
<td>Easton Crime Prevention</td>
<td>$39,500</td>
<td>CDBG</td>
<td>HO-2</td>
</tr>
<tr>
<td>Greater Easton Development Partnership - Ambassador Program</td>
<td>$50,000</td>
<td>CDBG</td>
<td>AM-1</td>
</tr>
<tr>
<td>ProJect of Easton, Inc. - Literacy Program and Workforce Development</td>
<td>$20,000</td>
<td>CDBG</td>
<td>CD-4</td>
</tr>
<tr>
<td>Miracle League of Northampton County - Administrative Costs</td>
<td>$21,000</td>
<td>CDBG</td>
<td>HS-3</td>
</tr>
<tr>
<td>CACLV - Slate Belt Rising Administration</td>
<td>$30,000</td>
<td>CDBG</td>
<td>HS-1</td>
</tr>
<tr>
<td>LVCIL - PLACE Program</td>
<td>$20,000</td>
<td>CDBG</td>
<td>HO-2</td>
</tr>
<tr>
<td>Northampton County Department of Human Services - Public Health Initiative</td>
<td>$45,000</td>
<td>CDBG</td>
<td>AM-1</td>
</tr>
<tr>
<td>Wesley Church - Educational Back Pack Program</td>
<td>$20,000</td>
<td>CDBG</td>
<td>AM-1</td>
</tr>
<tr>
<td><strong>TOTAL CDBG</strong></td>
<td><strong>$2,213,043</strong></td>
<td><strong>CDBG</strong></td>
<td><strong>CDBG</strong></td>
</tr>
<tr>
<td>HOME Program Administration</td>
<td>$64,711</td>
<td>HOME</td>
<td>AM-1</td>
</tr>
<tr>
<td>CHDO Set Aside</td>
<td>$64,711</td>
<td>HOME</td>
<td>HS-1</td>
</tr>
<tr>
<td>Northampton County Home Improvement</td>
<td>$517,689</td>
<td>HOME</td>
<td>HS-3</td>
</tr>
<tr>
<td><strong>TOTAL HOME</strong></td>
<td><strong>$647,111</strong></td>
<td><strong>HOME</strong></td>
<td><strong>HOME</strong></td>
</tr>
</tbody>
</table>
Table 2 – Project Information

<table>
<thead>
<tr>
<th>Project</th>
<th>Allocation</th>
<th>Agency</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rapid Rehousing</td>
<td>$184,798</td>
<td>ESG</td>
<td>HO-1</td>
</tr>
<tr>
<td><strong>TOTAL ESG</strong></td>
<td><strong>$184,798</strong></td>
<td><strong>ESG</strong></td>
<td><strong>ESG</strong></td>
</tr>
</tbody>
</table>

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

CDBG funds are intended to provide lower and moderate-income persons with viable communities, including decent housing, a suitable living environment, and expanded economic opportunities. Eligible activities include community facilities and improvements, housing rehabilitation and preservation, affordable housing development activities, public services, economic development, planning, and administration. These funds will be targeted to low- and moderate-income areas of the County and low- and moderate-income households.

HOME funds are intended to provide lower and moderate-income persons with decent, safe and sanitary housing that is affordable and accessible. Eligible activities include building, buying, and rehabilitating affordable housing for rent or homeownership, as well as providing direct rental assistance. These funds will be targeted to low- and moderate-income households.

ESG funds are intended to provide lower and moderate-income persons with emergency or transitional housing to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

The system for establishing the priority for the selection of these projects is predicated upon the following criteria:

- Meeting the statutory requirements of the CDBG, HOME, and ESG programs
- Meeting the needs of very-low, low-, and moderate-income residents
- Focus on low- and moderate-income areas or neighborhoods
- Types of target income households and populations with the greatest need for assistance
- Activities that will best address their needs
- Limited amount of funding to meet those needs
- Coordination and leveraging of resources
AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The following information provides a profile of the population, age, and racial/ethnic composition of Northampton County. This information was obtained from the U.S. Census Bureau American Factfinder website (http://factfinder.census.gov). The 2013-2017 American Community Survey 5 Year Estimates were used to analyze the social, economic, housing, and general demographic characteristics of the County.

Population:
- Between 1980 and 2017, the population increased by approximately 33.5%
- The County population was 300,941 in 2017.

Age:
- Median age in Northampton County is 42.0 years old
- Youth under age 18 account for 20.4% of the population
- Seniors age 62 or over are 21.9% of the population

Race/Ethnicity:
- 5.4% are Black or African American
- 86.2% are White
- 2.8% are Asian
- 2.1% Some Other Race
- 3.2% are Two or More Races
- 12.4% are Hispanic or Latino

Income Profile:
- The Median Income for a family of four (4) in Northampton County which is part of the Allentown-Bethlehem-Easton, PA HUD Metro FMR Area is $73,400 for 2017 per HUD’s Income Limit Documentation
- At the time of the 2013-2017 American Community Survey, median household income in the County was $65,390 which was higher than the Commonwealth of Pennsylvania (56,951)
- 35.7% of households have earnings received from Social Security income
- 3.8% of households have earnings received from public assistance
- 20.7% of households have earnings received retirement income
- 21.7% of female headed households were living in poverty
- 13.6% of all youth under 18 years of age were living in poverty

Economic Profile - The following illustrates the economic profile for Northampton County as of the 2013-2017 American Community Survey:
- 35.4% of the employed civilian population had occupations classified as management, business, science, and arts
- 24.8% of the employed civilian population had occupations classified as sales and office
- 17.3% were in the service sector
• The education, health, and social service industry represented 25.0% of those employed
• 9.8% of workers were considered in the government class

According to the U.S. Federal Reserve Economic Data Research Division and the U.S. Bureau of Labor Statistics, the preliminary unemployment rate for Northampton County in December 2017 was 4.1% compared to 4.7% for the Commonwealth of Pennsylvania in December 2017.

Geographic Distribution

<table>
<thead>
<tr>
<th>Target Area</th>
<th>Percentage of Funds</th>
</tr>
</thead>
<tbody>
<tr>
<td>Countywide</td>
<td>100</td>
</tr>
</tbody>
</table>

Table 6 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

On February 14, 2019, HUD issued notice CPD 19-02, “Low- and Moderate-Income Summary Data Updates” which announced the publication of updated low- and moderate-income summary data (LMISD) based on the American Community Survey 2011-2015 5-year estimates (2015 ACS). The LMISD replaces the prior LMISD based on the American Community Survey 2006-2010 5-year estimates (2010 ACS). The LMISD is used for the purpose of identifying areas that are eligible under the CDBG National Objective of providing benefit to low- and moderate-income persons on an area basis (“Area Benefit” or LMA). Northampton County has an overall low- and moderate-income percentage of 35.77%.

The following Census Tracts and Block Groups qualify as low- and moderate-income based on the Upper Quartile Exception Criteria (CTs BGs LMI% ≥ 46.58% established by HUD for Northampton County: CT 014200 BG 1 94.32%; CT 014200 BG 2 84.81%; CT 014200 BG 3 80.59%; CT 014200 BG 4 78.91%; CT 014200 BG 5 77.91%; CT 014300 BG 1 75.22%; CT 014300 BG 2 75%; CT 014300 BG 3 70.83%; CT 014400 BG 1 70.15%; CT 014400 BG 2 69.65%; CT 014400 BG 3 69.23%; CT 014500 BG 1 68.61%; CT 014500 BG 2 62.72%; CT 014600 BG 1 61.95%; CT 014600 BG 2 61.89%; CT 014700 BG 2 61.88%; CT 015201 BG 1 60.23%; CT 015201 BG 2 58.96%; CT 015201 BG 3 57.3%; CT 015201 BG 4 56.4%; CT 015600 BG 2 55.5%; CT 015600 BG 3 55.03%; CT 015700 BG 1 54.94%; CT 015700 BG 3 54.39%; CT 015901 BG 1 52.38%; CT 016201 BG 1 51.81%; CT 016201 BG 2 51.47%; CT 016600 BG 1 51.34%; CT 016600 BG 2 50.57%; CT 016800 BG 2 50.35%; CT 017200 BG 1 50%; CT 017200 BG 2 49.42%; CT 017300 BG 1 49.03%; CT 017300 BG 2 48.76%; CT 017401 BG 2 47.46%; CT 017402 BG 3 47.41%; CT 017800 BG 2 47.35%; CT 017901 BG 4 46.89%; CT 017902 BG 2 46.81%; and CT 018300 BG 3 46.58%.

Discussion

The County allocates its CDBG funds to primarily benefit low- and moderate-income persons. The Public Facilities and Infrastructure Improvement activities are either located in a low and moderate income census area or have a low and moderate income service area benefit or clientele. The Housing, Public Service, Homeless, Other Special Needs, and Job Creation activities have an income eligibility criterion; therefore, the income requirement restricts funds only to low and moderate income households throughout the County.
AP-55 Affordable Housing – 91.220(g)

Introduction

Northampton County will provide affordable housing assistance to the following sub-recipients:

- City of Easton
- Lehigh Valley Community Land Trust (LVCLT)

The following affordable housing accomplishments are expected to be completed during the FY 2020 CDBG Program Year:

<table>
<thead>
<tr>
<th>One Year Goals for the Number of Households to be Supported</th>
</tr>
</thead>
<tbody>
<tr>
<td>Homeless</td>
</tr>
<tr>
<td>Non-Homeless</td>
</tr>
<tr>
<td>Special-Needs</td>
</tr>
<tr>
<td>Total</td>
</tr>
</tbody>
</table>

Table 7 - One Year Goals for Affordable Housing by Support Requirement

<table>
<thead>
<tr>
<th>One Year Goals for the Number of Households Supported Through</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rental Assistance</td>
</tr>
<tr>
<td>The Production of New Units</td>
</tr>
<tr>
<td>Rehab of Existing Units</td>
</tr>
<tr>
<td>Acquisition of Existing Units</td>
</tr>
<tr>
<td>Total</td>
</tr>
</tbody>
</table>

Table 8 - One Year Goals for Affordable Housing by Support Type

Discussion

The County will fund the following affordable housing activities to achieve the stated one year goals above with FY 2020 CDBG and HOME funds:

- Easton City Redevelopment Authority Housing Acquisition and Rehab
- Easton City Redevelopment Authority Disposition
- CHDO Set Aside
- Northampton County Home Improvement
- Easton Home Improvement
- Northampton/Easton Housing Acquisition

Northampton County, a member of the Bethlehem, Easton, Northampton Lead – Consortium (BEN-LC) was awarded a HUD Lead-Based Paint Hazard Control grant in the amount of $1,500,000 and Healthy Homes Supplemental Funding in the amount of $150,000; for a total application in the amount of $1,650,000. The Consortium was also awarded $350,000 in PHARE Housing funds in 2018 for the Program, as well. The Consortium covers all the other municipalities located within the boundaries of Northampton County. The three collaborative jurisdictions have existing and successful Owner-occupied Housing Rehabilitation Programs that are funded with CDBG and HOME funds which will be complimented with
PHARE/HUD LBP funding to assist LMI households stay in their homes, decrease the amount of LBP hazards, and maintain the affordable housing stock in the County.
AP-60 Public Housing – 91.220(h)

Introduction

The Northampton County Housing Authority provides public housing for low-income County residents. The Northampton County Housing Authority’s Public Housing Waiting List is currently open. As of May 2018, there were 348 individuals on the waiting list. The Northampton County Housing Authority may administer up to 909 Section 8 Housing Choice Vouchers, but only 564 vouchers are currently under contract as of May 2018. The Section 8 Housing Choice Voucher waiting list remains open to people within a selected criteria: Applicants must be at or below the extremely low income limits and living, working, or attending school in Northampton County jurisdiction, which excludes the cities of Easton and Bethlehem. There are 427 individuals on the waiting list, as of May 2018. The Housing Authority also runs a Mainstream Program which provides ten (10) housing vouchers to non-elderly persons with disabilities. All Mainstream slots are currently filled. In FY 2016, the Housing Authority also began to offer Veterans' preference across all categories of their program waiting lists. There are currently two (2) veterans using Section 8 Housing Choice Vouchers.

Due to management cash flow issues, the Northampton County Housing Authority entered into an agreement with the Lehigh County Housing Authority to oversee both the Public Housing and HCV programs. Through this arrangement, substantially fewer funds were spent on activities such as inspections and bookkeeping; as many of those tasks were absorbed by the existing staff and consultant structure of the Lehigh County Housing Authority. Administrative cost savings have been achieved while still retaining all service related activities. The Lehigh County Housing Authority will continue to act under the direction of the Northampton County Housing Authority Board and continue to operate their housing programs.

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

The Northampton County Housing Authority received a FY 2018 Capital Funds Grant in the amount of $170,904. These funds will be used for routine maintenance and administration. The NCHA owns two (2) Public Housing properties:

1. Oliver Border House - 75 units, 15 South Wood Street, Nazareth, PA 18064
2. Howard Jones Manor -31 units, 129 Mill Street, Bath, PA 18014

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

The Housing Authority has 106 senior public housing units. As a result, the Housing Authority maintains a senior public housing tenant as a member of the board of commissioners. The Housing Authority does not have a Resident Advisory Board at this time but residents are encouraged to form a RAB. The property manager holds regular meetings to inform residents about Housing Authority initiatives. In order to better serve very non-English speaking public housing residents, the Housing Authority hired additional bi-lingual staff. Additionally, the Housing Authority conducted fair housing trainings for all staff members.

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

Not applicable; the Northampton County Housing Authority and Easton Housing Authority are not designated as troubled.

Discussion

Northampton County has identified that there is a need for decent, safe and sanitary housing that is affordable and accessible to address the households affected by housing problems, severe housing problems, and housing cost burdens. The largest groups affected by housing problems are the extremely low-income households and senior households. The Northampton County Housing Authority and Easton Housing Authority are important parts of the County's affordable housing strategy and the primary assisted housing provider of housing for extremely low income, very low income, and lower income residents of Northampton County.
AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The Eastern PA CoC serves a total of thirty-three (33) counties. The 33 counties are organized into five (5) geographically dispersed Regional Homeless Advisory Boards (RHABs). Northampton County is part of the Lehigh Valley Regional Homeless Advisory Board. The region is made up of two (2) counties which include: Lehigh County and Northampton County.

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

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

The Funding Committee is responsible for coordinating the annual application to HUD. In this capacity, it reviews all documents from the previous funding round; sets a schedule and time line for the current funding round; develops and edits forms for new project and renewal evaluations; develops ranking criteria; collaborates with the Data Management, Collection, and Outcomes Committee, as necessary; and provides ranking reports to the CoC. In addition, in order to increase CoC-wide performance, ensure the strategic use of HUD funds, and develop new resources, this Committee will also be charged with developing the CoC’s reallocation strategy. This includes setting policy to make any funding cuts or allocate new resources, based on the NOFA for the Continuum of Care.

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

The Continuum of Care completes a regular “Point in Time Count Survey” each January to determine the number of homeless individuals and families in the Eastern Pennsylvania Region. Based on the Point in Time Count (PITC) conducted during January 2019, the following numbers of homeless persons were reported in the Eastern PA CoC: Unsheltered - 12 individuals, 3 households, and 7 persons under the age of 18; Transitional Housing - 231 individuals, 83 households, and 141 persons under the age of 18; and Emergency Shelter - 517 individuals, 164 households, and 312 persons under the age of 18.

Unsheltered homelessness is not common in the mostly rural PA Eastern CoC. The largest percentage of unsheltered homeless are typically located in Lehigh, Northampton, and Monroe Counties. Ongoing street outreach occurs in these three (3) counties. The three (3) counties that have historically reported the
The majority of chronic homeless in Pennsylvania are Lehigh, Northampton, and Monroe Counties. There were not any chronically unsheltered homeless reported in the Eastern PA CoC during the January 2019 PITC. All CoC-funded PSH beds are required to prioritize chronic homelessness in all new and turnover beds that became available.

The biggest risk factors of homelessness continued to be: 1) a person or family double-up with another family, 2) being released from a psychiatric facility, 3) being released from a substance abuse treatment facility, or 4) being released from a correctional facility. The data points to the need to identify which institutions within the 33-County Eastern PA CoC were not using adequate discharge planning, and to improve their coordination with the CoC. To reduce first-time homelessness, the CoC has increased its homeless prevention resources through PHARE (Marcellus Shale fees), ESG, Supportive Services to Veteran Families (SSVF), and other funds. The Coordinated Entry pilot program, recently approved by the 33-county Eastern PA CoC, began in the Lehigh Valley in December 2016.

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

Northampton County uses the coordinated entry process established by the Eastern PA CoC LVRHAB to ensure the homeless crisis response system is easy to access, the needs of the homeless population are quickly identified and assessed, and priority decisions are based on those identified needs.

Coordinated Entry is currently being piloted in the Lehigh Valley. The Lehigh Valley Coordinated Entry Pilot Project coordinates access, assessment and referral to housing and services for families and individuals in Lehigh and Northampton Counties experiencing or at imminent risk of becoming homelessness.

Any family or individual experiencing a housing crisis in Lehigh or Northampton Counties can either call a toll-free hotline or visit a designated coordinated entry provider in Allentown, Bethlehem, or Easton. Veterans, people fleeing domestic violence, and transitional age or runaway youth will be immediately connected to appropriate services. Families and single adults will be assessed using a national best practice vulnerability and service prioritization tool called the VI-SPDAT. Consumers are then referred and connected to appropriate housing and services as they become available. The value of a coordinated entry system for housing crisis response services is described by the Lehigh Valley Coordinated Entry Pilot Project below:

- Connects more people to the right solution to end their housing crisis as quickly as possible
- Ensures fair and equal access to services
- Helps overcome geographic, cultural and linguistic barriers to access
- Prioritizes service for families and individuals who are literally homeless and most vulnerable
- Empowers providers to end homelessness rather than simply manage it
- Frees up providers to focus on client services with more accurate information to make decisions
- Improves communications, response time, data collection and efficient use of scarce funding and resources
- Generates better data about community needs, gaps in service, system performance and system/community/provider outcomes
- Supports a “Housing First” approach for people exiting homelessness to permanent housing with stability and then connecting them to mainstream and community services and benefits

The Lehigh Valley Coordinated Entry Pilot Project encourages agencies and stakeholders throughout the
region to assist the project:

• Nonprofit housing and service providers can be official pilot project referral partners
• County and municipal officials, police, first responders, educators, landlords and health providers can be pilot project champions and supporters
• Foundations, businesses and government agencies can provide leadership, funding and support for pilot project operations, capacity building and learning opportunities
• Members of the public can be advocates for the cause of ending and preventing homelessness

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

Using the HUD System Performance Measure Guidance, the HMIS Lead developed a CoC Performance Report with metrics for “Length of Time Homeless” (LOTH) and reviewed this data with the CoC Data Committee which meets quarterly to review CoC Performance and identify needed interventions. The strategies to reduce the length of time of homelessness include: 1) Coordinated Entry through the Vulnerability Index & Service Prioritization Decision Assistance Tool which included LOTH as a prioritization factor; 2) the CoC adopted a protocol that mirrors CPD 14-012, “Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status”, which directs Permanent Supportive Housing resources to those with the greatest LOTH; 3) the CoC increased its Rapid Rehousing inventory with the goal of housing people within 30 days of becoming homeless; and 4) the Data Committee reviewed aggregate and project level performance data quarterly to identify where LOTH was not decreasing.

Through the use of the VISPDAT, the CoC prioritizes the most vulnerable families. Rapid Rehousing (RRH) programs, along with all project types, are expected to serve families based on their vulnerability score, while utilizing a Housing First approach. The use of RRH has increased throughout the CoC. ESG funds are prioritized for RRH over homeless prevention services. An increase in Supportive Services for Veteran Families (SSVF) resources are being utilized to rapidly rehouse veteran families.

The CoC also aims to reduce the rate of individuals and families who return to homelessness. HMIS was used to develop a Performance Report comparing the baseline year, with the first full reporting year. The rates of return stayed roughly the same between years, 11% at 6 months and 13% at 12 months. The data committee reviews CoC level and program level data quarterly to monitor returns to homelessness upon exit from Transitional Housing, Rapid Rehousing, and Permanent Supportive Housing with the goal of determining patterns and to identify projects with high rates of return.

The local CareerLink and Community Action Agencies (CAA) operate a Ready-to-Work program for persons receiving Temporary Assistance for Needy Families (TANF) benefits, in collaboration with PA Workforce Investment Board (WIB) and PA CareerLink. The purpose of the program is to increase pre-employment skills. The majority of CoC funded projects are connecting with employment partners or other supportive...
service providers in the local community.

There were 0 unsheltered chronically homeless persons in the Eastern PA CoC at the time of the 2019 PIT count and 15 chronically homeless in emergency shelters. To improve access to Chronic Homeless beds across the CoC in counties with an excess of chronic homeless prioritized beds, the strategy is to implement the recently adopted “Bed Turnover Policy”, in which a bed will first be filled through the project’s waiting list, then within the County, then CoC wide.

The Lehigh Valley Homeless Veteran Task Force was created in February 2015. The Task Force does not fall under direct control of a single governmental entity. It works as a loose confederation of providers and servicers dedicated to ending Veteran homelessness in the Lehigh Valley. The Task Force is a working group of the Lehigh Valley RHAB and provides monthly reports to the members.

The Northampton County Housing Authority administers the HUD-VASH program and prioritizes veterans on their waiting list.

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

The CoC does not have coordination with health care providers throughout the geographic area. There are, however, examples of coordination in specific communities, but this is conducted mostly on an as needed basis, versus higher level discharge policies. Two changes are occurring on the state level that will have a major impact on future coordination of discharge planning:

1. PA DCED, the Collaborative Applicant, in collaboration with the PA Department of Human Services (DHS), is reorganizing the PA Interagency Council. The reorganization included adding partners from health care providers. Establishing new and enhancing current discharge policies to prevent homelessness will be a focus of the “new” PA Interagency Council.

2. A Legislative Task Force that has been charged with studying the causes and effects of homelessness in PA submitted their report in April 2016, entitled “Homelessness in Pennsylvania: Causes, Impacts, and Solutions: A Task Force and Advisory Committee Report.” The report presents a comprehensive review of impacts of homelessness on various populations and discusses public and private agencies’ actions to mitigate those impacts, and to secure safe and stable housing for people in need. The report included the task force’s and advisory committee’s recommendations for effective, efficient, and compassionate means for ending homelessness in Pennsylvania.

Recommendations include developing a Plan to End Homelessness with measurable goals, which outline key initiatives for preventing homelessness, including strengthening discharge planning. CoCs are required by the CoC Program interim rule to establish a Centralized or Coordinated Assessment system, also referred to as Coordinated Entry. Based on the recent Coordinated Entry Policy Brief, HUD’s primary goal for coordinated entry processes is to allocate assistance as effectively as possible. It also needs to be easily
accessible regardless of where or how people present for assistance. Most communities lack the resources needed to meet all of the needs of people experiencing homelessness.

Lack of resources, combined with the lack of a well-developed coordinated entry process, results in severe hardships for persons experiencing homelessness who often face long wait times to receive assistance or are screened out of needed assistance. Coordinated entry processes help communities prioritize assistance based on vulnerability and severity of service needs to ensure that people who need assistance the most can receive it in a timely manner. Coordinated entry processes also provide information about service needs and identify gaps to help communities plan their assistance and resources.

The Eastern PA CoC undertook a comprehensive Coordinated Entry planning process including stakeholder input across the CoC via survey and public meetings. Coordinated Entry was rolled out to the entire CoC in FY 2017. The Lehigh Valley Coordinated Entry Pilot Project coordinates access, assessment and referral to housing and services for families and individuals in Lehigh and Northampton Counties experiencing or at imminent risk of homelessness. The pilot project is funded through a grant from the US Department of Housing and Urban Development and in kind contributions from the Housing Alliance of Pennsylvania, Lehigh Conference of Churches, Third Street Alliance and Valley Youth House. The pilot is specific to the Lehigh Valley and includes outreach services through Valley Youth House and three walk-in sites. The walk-in sites are operated by the Lehigh Conference of Churches in Allentown and Bethlehem, and the Third Street Alliance in Easton.

Discussion

Continuation of the Coordinated Entry System: Any family or individual experiencing a housing crisis in Lehigh or Northampton Counties can either call a toll-free hotline or visit a designated coordinated entry provider in Allentown, Bethlehem, or Easton. Veterans, people fleeing domestic violence, and transitional age or runaway youth will be immediately connected to appropriate services. Families and single adults will be assessed using a national best practice vulnerability and service prioritization tool called the VI-SPDAT. Consumers will then be referred and connected to appropriate housing and services as they become available. The value of a coordinated entry system for housing crisis response services is described by the Lehigh Valley Coordinated Entry Pilot Project below:

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The Lehigh Valley Coordinated Entry Pilot Project encourages agencies and stakeholders throughout the region to assist the project:
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• County and municipal officials, police, first responders, educators, landlords and health providers can be pilot project champions and supporters
• Foundations, businesses, and government agencies can provide leadership, funding and support for pilot project operations, capacity building and learning opportunities
• Members of the public can be advocates for the cause of ending and preventing homelessness
AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

The Cities of Allentown, Bethlehem, and Easton, in partnership with Northampton County, are preparing a joint Analysis of Impediments to Fair Housing Choice (AI). The entitlement communities recognized the importance using a regional planning and action approach to affirmatively furthering fair housing. The AI identified local jurisdictional and regional collaborative actions the participants will undertake over the next five years to address fair housing choice and housing affordability.

Northampton County DCED staff routinely responds to questions from County residents pertaining to the Fair Housing Act and its provisions. Northampton County DCED staff is familiar with local Ordinances and Federal laws concerning fair housing that are designed to protect all residents of the community from discrimination.

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

North Penn Legal Services (NPLS) is a sub-recipient of FY 2019 CDBG funds and will continue to provide services in FY 2020. NPLS is funded as a public service activity and provides legal aid related to affordable housing, serving low- and moderate-income residents living in the County. NPLS staff provides assistance to residents who face eviction, are denied housing, or are forced to live in uninhabitable conditions. This activity is conducted through workshops held at local social service agencies and in mobile home parks. Information on foreclosures, consumer issues, and fair housing is also provided to the residents. In addition, NPLS monitors housing practices and counsels victims of discrimination. NPLS policies and activities promote the awareness of fair housing requirements. They provide consultation to developers and municipalities to ensure that rental and for-sale units are marketed in accordance with the affirmative marketing rules of the U.S. Department of Housing and Urban Development. NPLS ensures that all housing programs and services provided by the County, its municipalities, and NPLS itself, are administered in a way that promotes fair housing on the basis of race, national origin, religion, gender, disability, and familial status. NPLS’s fundamental mission is to increase access to affordable housing for all persons. Additionally, NPLS will host a Realtor Fair Housing Seminar to continue to educate real estate professionals on the requirements of the Fair Housing Act.

The Community Action Committee of Lehigh Valley (CACLV) implements the Community Action Financial Service Program, which will be funded through the Affordable Housing Trust Funds. The program provides homebuyer education, counseling, foreclosure prevention and recovery counseling to LMI persons living within the targeted area of Northampton County.

Lehigh Valley Center for Independent Living (LVCIL) is a sub-recipient of FY 2020 CDBG funds to provide housing counseling for people with disabilities who are living on limited income and may be at-risk of homelessness.

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

Additionally, the County will be sponsoring Fair Housing advertisements that will be applied to buses throughout Northampton County.

**Discussion:**

Northampton County will continue to encourage jurisdictions within the County to follow the Lehigh Valley Planning Commission's (LVPC) land development and model zoning ordinances. Some of the land development areas include: Conservation Subdivisions, Cottage Housing Development, Density Bonuses/Minimum Density, Inclusionary Zoning, Street Connectivity, Traditional Neighborhood Development, and Mixed Use Zoning and Development.
AP-85 Other Actions – 91.220(k)

Introduction:

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

Actions planned to address obstacles to meeting underserved needs

The primary obstacle to meeting the underserved needs in the County is the limited financial resources available to address the priorities identified in the Five Year Consolidated Plan and the lack of affordable housing in the County. Under the FY 2020 CDBG Program the County will take the following actions:

- Continue to leverage its financial resources and apply for additional public and private funds
- Continue to provide financial assistance for housing rehabilitation
- Continue to provide funding for public service activities
- Continue to do provide public facility improvements

Actions planned to foster and maintain affordable housing

The County will fund the following affordable housing activities with FY 2020 CDBG and HOME funds:

- Easton City Redevelopment Authority Housing Acquisition and Rehab
- Easton City Redevelopment Authority Disposition
- CHDO Set Aside
- Northampton County Home Improvement
- Easton Home Improvement
- Northampton/Easton Housing Acquisition

The Northampton County Housing Authority and Easton City Housing Authority will continue to fund the following activities to foster and maintain affordable housing in the County:

- Continue to provide Housing Choice Vouchers and public housing units
- Continue to rehabilitate and make improvements to public housing units

Northampton County will continue to encourage county jurisdictions to utilize and adopt the Lehigh Valley Planning Commission's (LVPC) land development and model zoning ordinances.

Actions planned to reduce lead-based paint hazards

The County will continue to comply with Title 24 Part 35: Lead-Based Paint Poisoning Prevention in Certain Residential Structures (Current Rule) for its Housing Rehabilitation Program. In order to meet the requirements of the new lead-based paint regulations, the County will take the following actions regarding housing rehabilitation:
• Applicants for rehabilitation funding receive the required lead-based paint information and understand their responsibilities.
• Staff properly determines whether proposed projects are exempt from some or all lead-based paint requirements.
• The level of Federal rehabilitation assistance is properly calculated and the applicable lead-based paint requirements determined.
• Properly qualified personnel perform risk management, paint testing, lead hazard reduction, and clearance services when required.
• Required lead hazard reduction work and protective measures are incorporated into project rehabilitation specifications.
• Risk assessment, paint testing, lead hazard reduction, and clearance work are performed in accordance with the applicable Standards established in 24 CFR Part 35, Subpart R.
• Required notices regarding lead-based paint evaluation, presumption, and hazard reduction are provided to occupants and documented.
• Program documents establish the rental property owner's responsibility to perform and document ongoing lead-based paint maintenance activities, when applicable.
• Program staff monitors owner compliance with ongoing lead-based paint maintenance activities.

The County, as a member of the BEN-LC, was awarded a $1,650,000 LBP grant in 2017 from HUD to identify and reduce lead-based paint and environmental hazards in pre-1978 housing throughout the County. Activities under this grant are ongoing.

**Actions planned to reduce the number of poverty-level families**

According to the U.S. Census 2013-2017 American Community Survey Five Year Estimates, approximately 30.5% of female-headed households with children were affected by poverty. Additionally, 13.6% of all youth under the age of 18 were living in poverty. Approximately 9.2% of the County of Northampton’s residents lived in poverty, which was lower than the Commonwealth of Pennsylvania where 13.1% of residents lived in poverty.

The County’s goal is to reduce the extent of poverty by actions the County can control and through work with other agencies and organizations. The County will fund the following anti-poverty activities with FY 2020 CDBG funds:

• Third Street Alliance
• Greater Shiloh Church

**Actions planned to develop institutional structure**

The County's Department of Community and Economic Development will coordinate activities among the public and private agencies and organizations in the County. This coordination will ensure that the goals outlined in the FY 2019-2023 Five Year Consolidated Plan will be effectively addressed by more than one agency. The staff of the Department of Community and Economic Development will facilitate and coordinate the linkage between these public and private partnerships and develop new partnership opportunities in the County.
This coordination and collaboration between agencies is important to ensure that the needs of the residents of Northampton County are being addressed. The main agencies that are involved in the implementation of the Plan, as well as additional financial resources that are available are the following:

**Public Agencies**
- Northampton County Department of Community and Economic Development – is responsible for administration of the CDBG program
- City of Easton Redevelopment Authority – is responsible for administration of the CDBG program in the City of Easton
- Northampton County Housing Authority – is responsible for administering Housing Choice Vouchers and public housing units
- Easton City Housing Authority – is responsible for administering Housing Choice Vouchers and public housing units

**Non-Profit Agencies**
There are several non-profit agencies that serve low income households in the County. The County continues to collaborate with these agencies.

**Private Sector**
The private sector is a key collaborator in the services and programs associated with the Five Year Consolidated Plan. The private sector brings additional financial resources and expertise that can be used to supplement existing services in the County. Examples of these private sectors are: local lenders, affordable housing developers, business owners, community and economic development organizations, healthcare organizations, and others. The County will continue to collaborate with local financial institutions, private housing developers, local realtors, etc.

**Actions planned to enhance coordination between public and private housing and social service agencies**
The County is committed to continuing its participation and coordination with social service agencies, housing agencies, community and economic development agencies, county, federal, and state agencies, as well as with the private and non-profit sectors, to serve the needs of target income individuals and families in the County. The County solicits funding requests for CDBG and HOME funds annually. The Department of Community and Economic Development staff provides help and assistance as needed to assist these public agencies that receive CDBG and HOME funding.

During this program year, the County will fund the following activities:
- Northampton County Administration County Admin
- City of Easton Redevelopment Authority Admin
- North Penn Legal Services Fair Housing Compliance
- GEDP Ambassador Planning
- Community Action Committee of the Lehigh Valley Slate Belt Rising Plan
- Slate Belt Heritage Center Feasibility Study for Heritage Site Redevelopment

Additionally, the County will continue to participate and look for collaboration opportunities between...
Lehigh Valley partners. The County is a member of the Bethlehem Easton Northampton Lead Consortium (BEN-LC). The BEN-LC is committed to improving the affordable housing stock in the Lehigh Valley. The County initiated the regional AI consortium including Allentown, Bethlehem, and Easton.

Discussion:

Northampton County is committed to ensuring that all federally funded projects meet federal requirements. The County frequently communicates with its subgrantees to monitor activities for compliance. The County issues contracts at the beginning of the program year and subgrantees are not authorized to begin an activity until they received a “Notice to Proceed” from the County. For each activity, the County maintains a checklist to ensure all areas of compliance were met based on the activity's national objective and eligibility. Regular site visits are performed, desk audits are performed, and the County monitors required subgrantee semiannual reports, as well as final reports.

County public infrastructure activities are subject to Davis-Bacon and Section 3 requirements. The County ensures subgrantees and contractors understood these requirements by holding preconstruction conferences, performing regular site visits, and reviewing certified payrolls for each covered activity.
AP-90 Program Specific Requirements – 91.220(l)(1,2,4)

Introduction:

Northampton County will receive $2,212,043 in CDBG funds, $647,111 in HOME funds, and $184,798 in ESG funds for FY 2020 Program Year. The County does not expect to receive any Program Income during the FY 2020 Annual Action Plan period. Since the County receives a CDBG, HOME, and ESG allocation, the questions below have been completed as applicable.

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

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed 0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee’s strategic plan 0
3. The amount of surplus funds from urban renewal settlements 0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan. 0
5. The amount of income from float-funded activities 0
Total Program Income 0

Other CDBG Requirements

1. The amount of urgent need activities 0

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

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

Northampton County does not anticipate the receipt of any additional program income funds prior to October 1, 2020 that it has not yet programmed. Not applicable.

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

The issue of resale/recapture arises when a homeowner that received homebuyer assistance under the HOME Program decides to sell the property. If the property is sold after the period of affordability has expired, there are no restrictions in terms of resale or recapture of HOME funds that apply to such a transaction. If, however, the sale occurs before the period of affordability has expired, certain regulatory limitations apply. The regulations at 92.254 (a)(5) give the participating jurisdiction two broad options relative to the treatment of properties that are sold before the period of affordability has expired.

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

**Recapture:**
The County’s Homebuyer Assistance Program (HAP) provides down payment and closing cost assistance to first time homebuyers and it is subject to recapture provisions. As part of this program, the homebuyer obtains a fee simple title to a one-unit dwelling or condominium, which has a purchase price that does not exceed 95% of the median purchase price. The County has generally defined affordability at 30% of the homebuyer’s household income but will consider slightly higher affordability based upon compensating factors and the recommendation of the pre-purchase counselor. The buyer must occupy the property as a principal residence and must qualify as low income (80% of median or less as defined by the IRS income determination method) at the time of purchase or, in the case of new construction, at the time the agreement of sale is signed.

The HOME subsidy of up to $15,000 down payment and closing costs is provided in the form of a deferred payment loan, forgivable after five years. The Mortgage Note defines the repayment of principal and reflects the homebuyer’s obligation to repay the HOME debt upon resale if the property is sold or is no longer the principal residence of the borrower during the affordability period. These terms must be approved by any lenders who have a priority in receiving proceeds in the event of a sale or foreclosure. These affordability provisions are automatically revoked if an ownership interest is prematurely terminated by foreclosure, transfer in lieu of foreclosure, or assignment of an FHA-insured mortgage to HUD. Further if the homeowner is able to reassume a redemptive interest in the property, the original affordability period is resumed and continues until its term expires or the property is sold.

**Resale:**
All homeownership housing and rental housing supported with funding from the County’s HOME program in the form of a development subsidy will be subject to a resale restriction. A development subsidy is the difference between the cost to develop housing and the market price. The purpose of the resale restriction is to ensure that the HOME-assisted unit remains affordable over the entire affordability period by requiring any purchasers or tenants to be low income. Resale restrictions are secured with a deed restriction placed on the property.

The resale restriction will apply to all HOME assisted homeownership units that receive a development subsidy. These projects will include acquisition-renovation-resale as well as new
construction-sales. In the event that a direct subsidy to the buyer, in the form of down payment and closing cost assistance is provided, it too will be covered by the resale restriction. All Habitat for Humanity projects will be covered by resale, as well.

**Fair Return on Investment:**
In the resale provisions of the County’s program guidelines for the HOME program, it provided for the original homebuyer to receive a “fair return” on his/her investment. Fair return on investment is defined as: “The homebuyer’s down payment plus capital improvements made to the home multiplied by the percentage change in the Consumer Price Index (CPI) over the period of ownership.

The fair return on investment is calculated as:
- The HOME-assisted buyer’s original down payment amount;
- Specific capital improvements made by the original homebuyer that adds value to the property based on actual costs by the original homebuyer and documented with receipts, or the average price increase in a home’s value based on the local real estate standards; and
- Plus the amount multiplied by the percentage change in the Consumer Price Index (CPI) as calculated for the period that the original homebuyer owned the house.
- *i.e.* Amount of the down payment plus the amount of the Capital Improvements multiplied by the CPI, then the total amount of the down payment plus the amount of Capital Improvements plus the amount multiplied by the CPI equals the fair return on investment.

The County recognizes that in certain circumstances, such as a declining housing market where the home values are decreasing, the original homebuyer may not receive a “return” on his/her investment because the home sells for less than, or the same price as the original price. However, the original homebuyer would still receive his/her amount of the down payment and the value of capital improvements as long sufficient proceeds are available.

The County will utilize the resale provisions in instances where the County provided HOME funds for the development of the house and the development costs exceed the fair market value, and no direct assistance is needed by the homeowner to purchase the home.

The property will have an affordability period and remain the principal place of residency of the homeowner based on the following schedule:

HOME Funds: Under $15,000, affordability period is 5 years; $15,000-$40,000, affordability period is 10 years; Over $40,000, affordability period is 15 years; and New construction or acquisition of newly constructed housing is 20 years.

If the home is sold during the affordability period, the following will be required as stipulated in the executed deed restriction.
- **Homebuyer** - must have an annual income that does not exceed 80% if the area median income.
- **Selling Price** – fair market value of a comparable house in the neighborhood.
• **Fair Return on Investment** – the percentage change in median sales prices over the period of ownership is based on the Multiple Listing Service (MLS) prices for a comparable house in the same neighborhood. The original homeowner is entitled to recoup the principal paid, as well as the costs incurred for capital improvements.

• **Affordability to New Homebuyer** – the PITI should not exceed 30% of the total income of the household.

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

   In the event the mortgaged property is sold or otherwise transferred prior to the expiration of five (5) years from the date of the initial sale, then 100% of the net proceeds from the sale of transfer shall be paid to the County. The total amount payable by borrower under the preceding paragraphs shall never exceed the face amount of the note. To the extent that the net proceeds are less than the outstanding principal balance of the note, the remainder shall be forgiven.

   **Shared net proceeds.** If the net proceeds are not sufficient to recapture the full HOME investment [or a reduced amount as provided for in CFR Sub-Part 92.254 (a)(5)(ii)(A)(2)] and enable the homeowner to recover the amount of his/her down payment and any capital improvement investment made by the owner since the purchase, the County may share the net proceeds. The net proceeds are the sales price minus loan repayment (other than HOME funds) and closing costs. The net proceeds may be divided proportionally as set forth in the following mathematical formulas:

   \[
   \frac{\text{HOME Investment}}{\text{HOME Investment} + \text{Homeowner Investment}} \times \text{Net Proceeds} = \text{HOME Amount to be Recaptured}
   \]

   \[
   \frac{\text{Homeowner Investment}}{\text{HOME Investment} + \text{Homeowner Investment}} \times \text{Net Proceeds} = \text{Amount to Homeowner}
   \]

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

   The County does not intend to use HOME funds to refinance existing debt secured by multi-family housing that is rehabilitated with HOME funds. Not applicable.