COUNTY OF NORTHAMPTON, PA

FY 2017 ANNUAL ACTION PLAN
U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
DRAFT FOR PUBLIC COMMENT

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)
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Executive Summary

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

1. Introduction

Northampton County, Pennsylvania is an entitlement community under the U.S. Department of Housing and Urban Development’s (HUD) Community Development Block Grant Program (CDBG). In compliance with HUD regulations, the County has prepared its FY 2017 Annual Action Plan for the period of October 1, 2017 through September 30, 2018. The FY 2017 Annual Action Plan is a strategic guideline for the implementation of the County's housing, community, and economic development activities. This is the sixth Annual Action Plan under the County’s FY 2012-2016 Consolidated Plan.

The FY 2017 Annual Action Plan is a collaborative effort between Northampton County, the community at large, social service agencies, housing providers, community development agencies, and economic development groups. The planning process was accomplished through input received at public meetings, analysis of statistical data, and review of the County’s Comprehensive Plan, as well as other community plans.

During the FY 2017 Program Year, Northampton County, PA will receive a CDBG FY 2017 allocation of $1,383,422 and anticipates $0 in CDBG Program Income. The County proposes to undertake the following activities with the FY 2017 CDBG Funds:

- Borough of Bangor - Road and ADA Ramp Infrastructure Improvements
- Borough of Bath - Washington Street Reconstruction
- Borough of North Catasauqua - ADA Playground Improvements
- Borough of Freemansburg - ADA Municipal Building Improvements
- Borough of Northampton - Street Paving
- Grace Church Senior Center - ADA Entrance Doors
- Borough of Roseto - Densico Street Improvements
- Borough of Tatamy - ADA Improvements Municipal Building
• Borough of West Easton - Sidewalk and ADA Ramps Borough Park
• Borough of Wilson - Street Rehab Program
• Borough of Wind Gap - - Alpha Road Stormwater project
• Northampton County Division of Children, Family, and Youth - Housing and Utility Assistance
• Lehigh Valley Community Land Trust - Scattered Site Affordable Housing Acquisition and Rehab
• Community Action Committee of the Lehigh Valley Community Action - Financial Services Foreclosure Mitigation
• Northampton County Department of Human Services - Public Health Initiative
• Lehigh Valley Center for Independent Living - PLACE Program
• North Penn Legal Service - Foreclosure Mitigation for Low Income Residents and Seniors from Reverse Mortgages
• Meals on Wheels - Better Fresh Local Produce
• Wesley Church - Backpack Program
• Second Harvest Food Bank - Backpack Buddies Program
• Northampton County Administration - County Admin
• North Penn Legal Services - Fair Housing
• Northampton County Department of Public Works and Parks - ADA Planning Study
• Borough of Northampton - Comprehensive ADA Plan
• Borough of North Catasauqua - Barrier-Free Elevator study
• Township of Lehigh - Comprehensive ADA Plan
• Community Action Committee of the Lehigh Valley - Slate Belt Rising Plan
2. **Summarize the objectives and outcomes identified in the Plan**

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

During the FY 2017 CDBG Program Year, Northampton County proposes to address the following priority need categories identified in its FY 2012 - 2016 Five Year Consolidated Plan:

- Housing
- Community Development
- Administration, Planning, and Management

3. **Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

Each year 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 the CAPER are available for review at the County’s Department of Community and Economic Development.

In the FY 2015 CAPER, the County expended 100% of its CDBG funds to benefit low- and moderate-income persons. The County expended 13.78% of its funds during the FY 2015 CAPER period on public service, which is below the statutory maximum of 15%. The County expended 18.57% of its funds during this CAPER period on Planning and Administration, which is below the statutory maximum of 20%. The County’s expenditure ratio at the end of the FY 2015 CAPER period was 1.24, which is below the 1.5 expenditure ratio maximum.

The County did not make any substantial amendments to prior year Annual Action Plans during the previous plan year. The County did not make any changes to its Five-Year Priorities and Goals during the previous plan year.
4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Northampton County prepared its Annual Action Plan in compliance with the County's Citizen Participation Plan. The County held its first public hearing on the needs of the community on Wednesday, March 29, 2017. This provided the residents, agencies, and organizations with the opportunity to discuss the County's CDBG program and to provide suggestions for FY 2017 CDBG Program priorities and activities. The Needs Public Hearing advertisement was published in The Express Times on March 15, 2017 and stated that CDBG funding applications were available on the County's website to apply for FY 2017 CDBG funding.

A “draft” of the FY 2017 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 Courthouse 669 Washington Street, Easton, PA 18042
- Bangor Public Library 39 S. Main Street, Bangor, PA, 18013
- Memorial Library of Nazareth & Vicinity Library 295 E. Center Street, Nazareth, PA 18064
- Northampton Area Public Library 1615 Laubach Avenue, Northampton, PA 18067
- County of Northampton website (www.northamptoncounty.org) Government section of the website under "Community and Economic Development"

A newspaper notice announcing that the "draft" plan was available for review was published in The Express Times, the newspaper of general circulation in the area. The County chose to use HUD’s waiver pursuant to 24 CFR 91.600 which waives the 30-day public comment requirement in 24 CFR 91.105(b)(4) and 24 CFR 91.115(b)(4) and instead use the minimum 14 calendar day comment period. The County chose to use HUD's waiver to allow for enough time to allocate funds to projects throughout the County based on its final allocation amount and County Council’s voting schedule. The County's fourteen day display period started on Friday, July 7, 2017 and ended on Monday, July 24, 2017.

The Second Public Hearing was held on Monday, July 10, 2017 to discuss the proposed FY 2017 CDBG activities. Upon completion of the 14 day comment period, the County submitted the Plan to the County Council for approval to submit the application at the County’s regularly scheduled Council meeting on...
Thursday, August 3, 2017. The Annual Action Plan was then electronically submitted through HUD’s online IDIS system on August, 11, 2017.

For a more detailed description of the citizen participation and consultation process, please refer to Sections AP-10 and AP-12.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

The County held its Needs Public Hearing on Wednesday, March 29, 2017 at 12 PM. No comments were received.

The County held its Second Public Hearing on Monday, July 10, 2017 at 12 PM. No comments were received.

For a more detailed description of the citizen participation and consultation process, please refer to Sections AP-10 and AP-12.

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

All comments and suggestions that were received were accepted and incorporated into the Annual Action Plan.

7. Summary

The goal of the FY 2017 Annual Action Plan is to improve the living conditions for all residents of Northamption County, to create a suitable and sustainable living environment, and to address the housing and community development needs of the County. The FY 2017 Annual Action Plan presents which activities the County will undertake during the program year beginning October 1, 2017 and ending September 30, 2018. During the FY 2017 Program Year, the County anticipates the following federal financial resources: FY 2017 CDBG Funds $1,383,422 and CDBG Program Income $0.
During the FY 2017 CDBG Program Year, the County proposes to address the following goals and strategies from its Five Year Consolidated Plan:

- Public Infrastructure
- Homeless Prevention
- Housing Acquisition and Rehabilitation
- Public Services
- Administration
- Planning
- Fair Housing
PR-05 Lead & Responsible Agencies – 91.200(b)

1. **Agency/entity responsible for preparing/administering the Consolidated Plan**

Describe the agency/entity responsible for preparing the Consolidated 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>CDBG Administrator</td>
<td>Northampton County</td>
<td>Department of Community and Economic Development</td>
</tr>
</tbody>
</table>

**Table 1 – Responsible Agencies**

**Narrative (optional)**

Northampton County's Department of Community and Economic Development is the administering agency for the CDBG program. The Office of Community and Economic Development 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, pay requests, 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

Frank Brooks, CDBG Specialist
Department of Community and Economic Development
County of Northampton, Pennsylvania
669 Washington Street
Easton, Pennsylvania 18042
(610) 829-6311
fbrooks@northamptoncounty.org
AP-10 Consultation – 91.100, 91.200(b), 91.215(l)

1. Introduction

While preparing the FY 2017 Annual Action Plan, Northampton County consulted with the Northampton County Housing Authority, local municipalities, non-profit agencies/organizations, and members of the Eastern Pennsylvania CoC - Lehigh Valley Regional Homeless Advisory Board, which includes the following two (2) counties: Lehigh and Northampton.

The Eastern Pennsylvania CoC serves and acts as the oversight and planning body for preventing and ending homelessness for the CoC general membership body. Northampton County is a member of the Lehigh Valley Regional Homeless Advisory Board (LV-RHAB) under the Eastern PA CoC. The Board comprises a diverse set of representative stakeholders throughout Lehigh County and Northampton County. The Board sets policy based on the knowledge and experience of its members. The Board also sets priorities and makes funding decisions in response to applications for funding homeless projects.

Other members of the Board consist of the social service agencies, shelter providers, and stakeholders that serve the residents of the region. Coordination of the programs and funds is accomplished by the CoC Board for the chronically homeless individuals and families, families with children, veterans, and unaccompanied youth, along with the administration of the HMIS System.

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))

Northampton County works with the following agencies to enhance coordination:

- Northampton County Department of Community and Economic Development - oversees the CDBG program.
Northampton County Housing Authority - oversees the Section 8 Housing Choice Voucher Program, improvements to public housing communities, and the development of scattered site affordable housing.

Social Services Agencies - the County provides funds to address the needs of low- and moderate-income persons.

Housing Providers - the County provides funds to rehabilitate and develop affordable housing for low- and moderate-income families and individuals.

Lehigh Valley Regional Homeless Advisory Board - oversees the Continuum of Care Network for Eastern Pennsylvania CoC - Lehigh Valley Regional Homeless Advisory Board for the following counties: Lehigh and Northampton.

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). Northampton County's Department of Community and Economic Development staff attends the local CoC meetings and acts as the County's representative. The County coordinates its activities with the Continuum of Care and supports its applications for funds. The County helps the Eastern Pennsylvania CoC to address homelessness by working together to develop a framework to deliver housing and services to the homeless.

The RHAB identifies regional and local homeless issues; coordinates regional planning; identifies regional housing gaps and needs, strategies, and priorities; provides input for Supportive Services for Veteran Families (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). Northampton County is a member of the Lehigh Valley Regional Homeless Advisory Board (RHAB), which also includes
Northampton County. Many of the homeless resources in Lehigh and Northampton Counties are utilized by residents of both Counties. The Lehigh Valley RHAB Co-Chairs are currently representatives of 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 CoC solicits and considers a wide range of opinions through the five (5) Regional Homeless Advisory Board (RHABs) monthly meetings and semi-annual full CoC meetings. Both forums provide opportunities for persons to provide input and assistance in ending homelessness. The RHAB Co-Chairs represent multiple interest groups including: CDBG Jurisdictions, Public Housing Authorities, domestic violence service providers, Veterans, youth service providers, Community Action Partnerships (CAP), homeless service providers, and faith-based organizations.

Most of the Eastern PA CoC comes under the State Consolidated Plan developed by PA DCED; however, there are twelve (12) additional Consolidated Plan Jurisdictions representing the more populated areas of the Lehigh Valley and Cumberland County, including the respective cities. PA DCED uses web based forums to meet with Regional Housing Advisory Committees (RHACs). RHAC meetings are held annually and generally last two (2) hours. The RHACs include state grantees, housing officials, developers, nonprofits, CoC Chairs, and PA DCED staff. Also, as part of the citizen participation process, members of the CoC receive notice of public meetings, documents available for review, and citizen comment periods. The County and City Consolidated Plan Jurisdictions follow the Con Plan guidelines for consultation, including interviews, surveys, and focus groups with stakeholders knowledgeable about homelessness in their communities.
Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

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

An ESG Committee, also composed of CoC members, is being formed to help determine ESG policy/performance standards. Data Committee findings will inform the ESG Committee and assist them in establishing standards. Additionally, Northampton County will be submitting an application to PA DCED for FY 2017 State ESG funds for a rapid rehousing project in the amount of $150,000.

The CoC and the HMIS lead work together to assess data quality throughout the CoC. This includes working on Annual Homeless Assessment Report (AHAR) submission, the PIT count, project review/ranking, and working with individual programs while completing their Annual Performance Reports (APRs). The CoC plans to increase the bed coverage percentage in HMIS over the next 12 months. Currently, 45% of Emergency Shelter beds are on HMIS. Projects not on HMIS include nine (9) projects providing hotel/motel vouchers, and six (6) projects that operate seasonally. There is better coverage for Transitional Housing beds, with 75% on HMIS. Runaway & Homeless Youth Program (RHY) funded projects are now entering data into HMIS, and thus the bed coverage rate has increased since the 2015 Housing Inventory Count (HIC) was completed. There is also a high rate of coverage for Permanent Supportive Housing beds,
with 69% on HMIS. Of the 405 beds not on HMIS, 327 are Veterans Affairs Supportive Housing (VASH) beds. 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.

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

All agencies were consulted.
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 CoC is the primary provider of housing and supportive services for the area’s homeless and at risk of being homeless population. 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 Housing Authority is the primary provider of affordable housing for the area's low-income population. The goals of the County and the Housing Authority are complementary.</td>
</tr>
<tr>
<td>Regional Analysis of Impediments to Fair Housing</td>
<td>Lehigh Valley Economic Development Corporation</td>
<td>The goals of the County and the RAI are complementary.</td>
</tr>
</tbody>
</table>

Table 2 – Other local / regional / federal planning efforts

Narrative (optional)

The strategy of Northampton County's Annual Action Plan is 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 and jurisdictions of government and the private sector, including for-profit and non-profit organizations. The Annual Action Plan is an application for FY 2017 CDBG funds under HUD’s formula grant program. The Annual Action Plan combined with the Five Year Consolidated Plan act as a strategic vision to be followed by the County in carrying out federal programs that primarily benefit low- and moderate-income persons.
1. **Summary of citizen participation process/Efforts made to broaden citizen participation**

Summarize citizen participation process and how it impacted goal-setting

Northampton County, in compliance with the County’s Citizen Participation Plan, advertised and held two (2) public hearings on the needs of the County that provided residents and stakeholders with the opportunity to discuss the County’s CDBG Program and to offer their suggestions on CDBG program priorities. The public hearings were advertised in The Express Times on March 15, 2017 and June 22, 2017.

A “Draft Plan” was placed on display at the following locations:

- County of Northampton Department of Community & Economic Development - County of Northampton Courthouse 669 Washington Street, Easton, PA 18042
- Bangor Public Library 39 S. Main Street, Bangor, PA, 18013
- Memorial Library of Nazareth & Vicinity Library 295 E. Center Street, Nazareth, PA 18064
- Northampton Area Public Library 1615 Laubach Avenue, Northampton, PA 18067
- County of Northampton website (www.northamptoncounty.org) Government section of the website under “Community and Economic Development”

The "Draft Plan" was on display from July 7, 2017 until July 24, 2017 for review and comment. The draft plan review period was advertised in The Express Times on June 22, 2017. The County chose to use HUD’s waiver pursuant to 24 CFR 91.600 which waives the 30-day public comment requirement in 24 CFR 91.105(b)(4) and 24 CFR 91.115(b)(4) and instead use the minimum 14 calendar day comment period. The County chose to
use HUD’s waiver to allow for enough time to allocate funds to projects throughout the County based on its final allocation amount and County Council’s voting schedule.

**Citizen Participation Outreach**

<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Mode of Outreach</th>
<th>Target of Outreach</th>
<th>Summary of response/attendance</th>
<th>Summary of comments received</th>
<th>Summary of comments not accepted and reasons</th>
<th>URL (If applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Public Hearing</td>
<td>Non-targeted/broad community</td>
<td>A public hearing was held on Wednesday, March 29, 2017 to discuss the Annual Action Plan.</td>
<td>Related Public Hearing documents can be found in the appendix section of this Plan.</td>
<td>All comments were accepted.</td>
<td>N/A</td>
</tr>
<tr>
<td>2</td>
<td>Public Hearing</td>
<td>Non-targeted/broad community</td>
<td>A public hearing was held on Monday, July 10, 2017 to discuss the Annual Action Plan.</td>
<td>Related Public Hearing documents can be found in the appendix section of this Plan.</td>
<td>All comments were accepted.</td>
<td>N/A</td>
</tr>
</tbody>
</table>

**Table 3 – Citizen Participation Outreach**
Expected Resources

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

Introduction

Northampton County will receive $1,383,422 as its CDBG allocation for the FY 2017 Program Year. The County does not expect to receive any Program Income during the FY 2017 Annual Action Plan period. The County’s FY 2017 CDBG program year starts on October 1, 2017 and concludes on September 30, 2018. The following financial resources are identified for the FY 2017 Annual Action Plan and will be used to address the following priority needs: Housing; Community Development; and Administration, Planning, and Management. The accomplishments of these projects/activities will be reported in the FY 2017 Consolidated Annual Performance and Evaluation Report (CAPER).

Priority Table

<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>
</tr>
</thead>
<tbody>
<tr>
<td>CDBG</td>
<td>public - federal</td>
<td>Admin and Planning Housing Public Improvements Public Services</td>
<td>1,383,422 0 0 1,383,422</td>
<td>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.</td>
</tr>
</tbody>
</table>

Table 4 - 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 regularly applies for and receives HOME funds through the Pennsylvania Department of Community and Economic Development HOME Investment Partnership Program. HOME funds can be used in a variety of ways, including market-oriented approaches that offer opportunities such as housing rehabilitation, homeownership or rental activities to revitalize communities with new investment. Homeownership and housing rehabilitation creates economic prosperity for communities and families and acts as a dynamic generator of economic growth.

CDBG/HOME sub recipients are encouraged to leverage additional resources (such as private, state and local funds) for projects. Sub recipients are required to submit matching fund sources in the sub recipient 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

The County has secured the following source of funds to complement its proposed CDBG funding:

- HUD Lead-Based Paint Hazard Control grant of $1,500,000 and Healthy Homes Supplemental Funding of $150,000 for a total in the amount of $1,650,000
If appropriate, describe publically 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 publically owned land or property located within the jurisdiction to address the needs identified in the plan.

Discussion

The program year goes from October 1, 2017 through September 30, 2018. These funds will be used to address the following priority needs:

- Housing
- Community Development
- Administration, Planning, and Management
Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

During the FY 2017 CDBG Program Year, the County proposes to address the following goals and strategies from its Five Year Consolidated Plan:

- Public Infrastructure
- Homeless Prevention
- Housing Acquisition and Rehabilitation
- Public Services
- Administration
- Planning
- Fair Housing

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b):

Not applicable; the County does not receive HOME funds. The County will utilize its FY 2017 CDBG funds for affordable housing. The one year goals for affordable housing in the County for FY 2017 are as follows:
One Year Goals for the Number of Households to be Supported:

- Homeless – 0
- Non-Homeless – 2
- Special-Needs – 0
- Total = 2

One Year Goals for the Number of Households Supported Through:

- Rental Assistance – 0
- The Production of New Units – 0
- Rehab/Acquisition of Existing Units – 2
- Total = 2

Lehigh Valley Community Land Trust (LVCLT) Scattered Site Affordable Housing Acquisition and Rehab project will benefit 2 LMI Households in the County. LVCLT’s project acquires housing and rehabilitates the housing for an income qualified household to purchase the housing unit.
**AP-35 Projects – 91.220(d)**

**Introduction**

In order to address the priority needs of Northampton County, the proposed FY 2017 Annual Action Plan proposes the following activities:

<table>
<thead>
<tr>
<th>Munic/Org</th>
<th>Project</th>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Borough of Bangor</td>
<td>Road and ADA Ramp Infrastructure Improvements</td>
<td>Public Infrastructure</td>
<td>$61,385</td>
</tr>
<tr>
<td>Borough of Bath</td>
<td>Washington Street Reconstruction</td>
<td>Public Infrastructure</td>
<td>$62,000</td>
</tr>
<tr>
<td>Borough of North Catasauqua</td>
<td>ADA Playground Improvements</td>
<td>Public Infrastructure</td>
<td>$25,000</td>
</tr>
<tr>
<td>Borough of Freemansburg</td>
<td>ADA Municipal Building Improvements</td>
<td>Public Infrastructure</td>
<td>$35,000</td>
</tr>
<tr>
<td>Borough of Northampton</td>
<td>Street Paving</td>
<td>Public Infrastructure</td>
<td>$75,000</td>
</tr>
<tr>
<td>Grace Church Senior Center</td>
<td>ADA Entrance Doors</td>
<td>Public Infrastructure</td>
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<tr>
<td>Borough of Tatamy</td>
<td>ADA Improvements Municipal Building</td>
<td>Public Infrastructure</td>
<td>$20,520</td>
</tr>
<tr>
<td>Borough of West Easton</td>
<td>Sidewalk and ADA Ramps Borough Park</td>
<td>Public Infrastructure</td>
<td>$20,320</td>
</tr>
<tr>
<td>Borough of Wilson</td>
<td>Alpha Road Stormwater project</td>
<td>Public Infrastructure</td>
<td>$75,000</td>
</tr>
<tr>
<td>Borough of Wind Gap</td>
<td>Street Rehab Program</td>
<td>Public Infrastructure</td>
<td>$75,000</td>
</tr>
<tr>
<td>Northampton County Division of Children, Family, and Youth</td>
<td>Housing and Utility Assistance</td>
<td>Homeless Prevention</td>
<td>$75,000</td>
</tr>
<tr>
<td>Lehigh Valley Community Land Trust</td>
<td>Scattered Site Affordable Housing Acquisition and Rehab</td>
<td>Property Acquisition and Rehab</td>
<td>$200,000</td>
</tr>
<tr>
<td>Community Action Committee of the Lehigh Valley</td>
<td>Community Action Financial Services Foreclosure Mitigation</td>
<td>Public Service</td>
<td>$30,513</td>
</tr>
<tr>
<td>Northampton County Department of Human Services</td>
<td>Public Health Initiative</td>
<td>Public Service</td>
<td>$40,000</td>
</tr>
<tr>
<td>Lehigh Valley Center for Independent Living</td>
<td>PLACE Program</td>
<td>Public Service</td>
<td>$40,000</td>
</tr>
</tbody>
</table>
Describe the reasons for allocation priorities and any obstacles to addressing underserved need

CDBG funds are intended to provide lower and moderate income households 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.

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 program
- Meeting the needs of very-low, low-, and moderate-income residents
- Focus on low- and moderate-income areas or neighborhoods
- Coordination and leveraging of resources
- Response to expressed needs
- Sustainability and/or long term impact
- The ability to measure or demonstrate progress and success
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 2010-2014 American Community Survey 5 Year Estimates were used to analyze the social, economic, housing, and general demographic characteristics of the County. The 5 year estimates are the most recent data available for the County. The 2010 U.S. Census data is included when necessary.

Population:

- Between 1980 and 2010, the population increased by approximately 32.1%
- The County population was 300,654 in 2014.

Age:

- Median age in Northampton County is 41.5 years old
- Youth under age 18 account for 16.0% of the population
- Seniors age 62 or over are 44.7% of the population

Race/Ethnicity:

- 5.1% are Black or African American
- 86.4% are White
- 2.7% are Asian
- 2.6% Some Other Race
- 2.9% are Two or More Races
- 11.3% 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 2010-2014 American Community Survey, median household income in the County was $61,041 which was higher than the Commonwealth of Pennsylvania ($53,115).
- 34.3% of households have earnings received from Social Security income.
- 3.0% of households have earnings received from public assistance.
- 22.3% of households have earnings, received retirement income.
- 25.6% of female headed households were living in poverty.
• 13.5% of all youth under 18 years of age were living in poverty.

Low/Mod Income Profile:

The following Census Tracts and Block Groups qualify as low- and moderate-income based on the Upper Quartile Exception Criteria established by HUD for Northampton County: CT 016600 BG 2 69.83%; CT 015201 BG 5 65.79%; CT 017200 BG 1 62.15%; CT 017603 BG 4 61.90%; CT 016201 BG 3 57.37%; CT 016201 BG 4 57.34%; CT 015600 BG 2 56.69%; CT 017902 BG 1 52.97%; CT 016100 BG 1 51.41%; CT 017200 BG 2 50.62%; CT 015700 BG 1 49.12%; CT 017501 BG 1 49.07%; CT 017200 BG 3 48.08%; CT 015600 BG 3 47.72%; CT 017603 BG 3 46.81%; CT 017101 BG 2 46.72%; CT 017300 BG 2 45.64%; CT 016100 BG 2 45.49%; CT 018002 BG 1 45.09%; CT 017200 BG 4 45.07%; CT 017800 BG 1 44.83%; CT 016300 BG 1 44.54%; CT 017604 BG 2 44.19%; CT 016201 BG 2 44.02%; CT 016800 BG 3 43.10%; CT 015500 BG 1 42.86%; CT 015201 BG 2 42.81%; CT 018300 BG 1 42.41%; CT 015700 BG 3 41.57%; CT 018300 BG 2 47.89%; CT 017401 BG 2 40.69%; CT 015201 BG 1 40.48%; CT 018300 BG 3 39.18%; CT 017501 BG 3 38.60%; CT 017300 BG 1 38.15%; CT 015201 BG 4 38.08%; CT 016202 BG 2 37.90%; CT 017901 BG 1 37.50%; CT 015700 BG 2 37.31%; CT 015300 BG 3 36.72%; CT 017901 BG 4 36.59%; CT 016500 BG 3 36.31%; CT 017000 BG 1 36.11%; CT 016800 BG 4 35.84%; CT 015600 BG 1 35.69%; CT 015201 BG 3 35.60%; CT 017800 BG 2 35.18%; CT 016600 BG 1 34.98%; CT 017703 BG 1 34.83%; CT 015902 BG 1 34.77%; CT 017401 BG 1 34.07%; CT 017501 BG 2 33.94%; CT 015400 BG 2 33.91%; CT 015300 BG 2 33.76%; CT 015902 BG 2 33.33%; CT 018200 BG 2 32.75%; CT 016300 BG 2 31.85%; CT 017603 BG 2 31.79%; CT 016002 BG 2 31.68%; CT 016800 BG 2 31.58%; CT 015901 BG 4 31.32%; CT 016800 BG 1 31.14%; CT 016201 BG 1 31.12%; CT 015901 BG 1 30.32%; CT 015300 BG 1 29.70%; CT 015500 BG 2 29.64%; CT 016002 BG 3 28.78%; CT 016902 BG 1 28.73%; CT 015500 BG 3 28.27%; CT 017402 BG 2 28.14%; CT 017402 BG 3 27.61%; and CT 017901 BG 3 27.40%.

Northampton County has an overall low- and moderate-income percentage of 27.37%.

Economic Profile:

The following illustrates the economic profile for Northampton County as of the 2010-2014 American Community Survey:

• 34.7% 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.
- 17.4% were in the service sector.
- The education, health, and social service industry represented 25.8% of those employed.
- 10.7% of workers were considered in the government class.

According to the U.S. Labor Department, the preliminary unemployment rate for Northampton County in December 2016 was 4.7% compared to 5.6% for the Commonwealth of Pennsylvania in December 2016.

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

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 Improvement activities have an income eligibility criterion; therefore, the income requirement restricts
funds only to low and moderate income households throughout the County.

Discussion

The geographic locations and the public benefit for the FY 2017 CDBG Activities/Projects are as follows:

- Borough of Bangor Road and ADA Ramp Infrastructure Improvements
- Borough of Bath Washington Street Reconstruction
- Borough of North Catasauqua ADA Playground Improvements
- Borough of Freemansburg ADA Municipal Building Improvements
- Borough of Northampton Street Paving
- Grace Church Senior Center ADA Entrance Doors
- Borough of Roseto Densico Street Improvements
- Borough of Tatamy ADA Improvements Municipal Building
- Borough of West Easton Sidewalk and ADA Ramps Borough Park
- Borough of Wilson Alpha Road Stormwater project
- Borough of Wind Gap Street Rehab Program
- Northampton County Division of Children, Family, and Youth Housing and Utility Assistance
- Lehigh Valley Community Land Trust Scattered Site Affordable Housing Acquisition and Rehab
- Community Action Committee of the Lehigh Valley Community Action Financial Services Foreclosure Mitigation
- Northampton County Department of Human Services Public Health Initiative
- Lehigh Valley Center for Independent Living PLACE Program
- North Penn Legal Service Foreclosure Mitigation for Low Income Residents and Seniors from...
Reverse Mortgages

- Meals on Wheels Better Fresh Local Produce
- Wesley Church Backpack Program
- Second Harvest Food Bank Backpack Buddies Program
- Northampton County Administration County Admin
- North Penn Legal Services Fair Housing
- Northampton County Department of Public Works and Parks ADA Planning Study ADA Study
- Borough of Northampton Comprehensive ADA Plan
- Borough of North Catasauqua Barrier-Free Elevator study
- Township of Lehigh Comprehensive ADA Plan
- Community Action Committee of the Lehigh Valley Slate Belt Rising Plan
Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Northampton County through its sub-recipient Lehigh Valley Community Land Trust (LVCLT) will utilize its FY 2017 CDBG funds to acquire and rehabilitate existing housing units to two (2) LMI households in Northampton County.

<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><strong>Total</strong></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><strong>Total</strong></td>
</tr>
</tbody>
</table>

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

Lehigh Valley Community Land Trust (LVCLT) Scattered Site Affordable Housing Acquisition and Rehab project will benefit 2 LMI Households in the County. LVCLT's project acquires housing and rehabilitates the housing for an income qualified household to purchase the housing unit.

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 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 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 September of 2016, there were 199 individuals on the waiting list. The Northampton County Housing Authority administers 909 Section 8 Housing Choice Vouchers. The Section 8 Housing Choice Voucher waiting list was last opened in April of 2013. As of September of 2016, there are 92 individuals on the waiting list. The Housing Authority also started a Mainstream Program which provides ten (10) housing vouchers to non-elderly persons with disabilities. In FY 2016, the Housing Authority also began to offer Veterans' preference across all categories of their program waiting lists.

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 2015 Capital Funds Grant in the amount of
$94,857.00. These funds were used for the following activities:

- Operations - $19,000
- Administration - $9,486
- Fees and Costs - $10,000
- Dwelling Structures - $56,371
- **Total: $94,857**

Future funds will be used for exterior improvements such as landscaping, parking lot repairs and retaining wall repair at Oliver Boarder House, and caulking, siding repairs and paint at Howard Jones Manor.

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

The Housing Authority does not have a Resident Advisory Board at this time. 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 is not designated as troubled.

**Discussion**

Northampton County has identified that there is a need for decent, safe, and sanitary housing 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 is an important part 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

In the past year, PA-507 CoC merged with PA-509 to create the Eastern PA CoC, serving 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 re-housing 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.

Through the FY 2016 Continuum of Care (CoC) Program competition, the Lehigh Valley Regional Housing
Advisory Board received funding for fourteen (14) renewals and two (2) new projects totaling $3,030,783.00 for support services and permanent supportive housing projects throughout the region. Of the sixteen (16) projects funded, fifteen (15) were Tier 1 awards, and one (1) was a Tier 2 award. HUD will contract with these agencies during the FY 2016 program year.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including the following:

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 2017, the following numbers of homeless persons were reported in the Eastern PA CoC:

- Unsheltered - 405 individuals, 7 families with children, and 1 children only
- Transitional Housing - 761 individuals, 165 families with children, and 0 children only
- Emergency Shelter – 1,004 individuals, 134 families with children, and 17 children only

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 majority of chronic homeless in Pennsylvania are Lehigh, Northampton, and Monroe Counties. There were only three (3) unsheltered households with children that were chronically homeless reported in the Eastern PA CoC during the January 2017 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**

During FY 2017, Northampton County will be filing an application with Pennsylvania’s Department of Community and Economic Development for an Emergency Solutions Grant (ESG) in the amount of $150,000. The funds will be used for rapid rehousing assistance.

**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 Re-Housing inventory by 87 units in projects submitted in FY 2015 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 Re-Housing (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 Re-Housing, 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. 81% of all CoC funded projects are connecting with the above-referenced employment partners, or others in their local communities.

There were 52 unsheltered chronically homeless persons in the Eastern PA CoC at the time of the 2017 PITC, and 104 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 (part of the PA-509 CoC) 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 forces and advisory committee’s recommendations for effective, efficient, and compassionate means for ending homelessness in the State of 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 is currently being piloted in the Lehigh Valley. It will be 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 was launched in December 2016. 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:

- 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 providers to focus on service provision 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 to exiting people from 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

Northampton County has allocated $75,000 in FY 2017 CDBG funds to the Northampton County Division of Children, Family, and Youth Housing and Utility Assistance Program to address homeless prevention.
**AP-75 Barriers to affordable housing – 91.220(j)**

**Introduction**

Northampton County participated in a Regional Analysis to Impediments (RAI) in December of 2014 in coordination with Lehigh County and the Cities of Allentown, Bethlehem, and Easton. This regional analysis examined a number of factors that may affect housing opportunities and choice from the larger community perspective and how the area as a whole could collaborate on addressing barriers to fair housing choice.

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**

The following impediments to fair housing choice were identified concerning the negative effects of public policies that serve as barriers to affordable housing that Northampton County continues to address:

- Impediment #4: Zoning Provisions Impacting People with Disabilities
- Impediment #5: Zoning Provisions Restricting Residential Uses From Residential Districts
- Impediment #6: Condition of Affordable Housing Stock

North Penn Legal Services (NPLS) is a sub-recipient of FY 2017 CDBG funds. 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.

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.

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.

Discussion

Northampton County will continue to encourage jurisdictions within the County to follow the Lehigh Valley Planning Commission's (LVPC) model ordinance for inclusionary zoning. The model ordinance is publicly available through the LVPC website (www.lvpc.org) and the LVPC office. They have been praised by HUD as the standard for Pennsylvania communities to adopt. The titles of the model ordinance and guidance documents include the following: Conservation Subdivisions, Cottage Housing Development, Density Bonuses/Minimum Density, Inclusionary Zoning, Street Connectivity, Traditional Neighborhood
Northampton County will use FY 2017 CDBG funds to the following activities:

- North Penn Legal Services - Fair Housing Compliance $32,000
- Community Action Committee of the Lehigh Valley - Community Action Financial Services Foreclosure Mitigation $30,513
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. The County is not a HUD entitlement jurisdiction under the HOME program. Therefore, resources for housing activities are limited. Under the FY 2017 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 projects with FY 2017 CDBG funds:

- Northampton County Division of Children, Family, and Youth Housing and Utility Assistance - $75,000
- Lehigh Valley Community Land Trust Scattered Site Affordable Housing Acquisition and Rehab - $200,000
- Community Action Committee of the Lehigh Valley Community Action Financial Services
Foreclosure Mitigation - $30,153

- North Penn Legal Services Fair Housing Compliance - $32,000

The Northampton County 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 adopt the Lehigh Valley Planning Commission’s (LVPC) model ordinances for inclusionary zoning.

**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 from HUD to identify and reduce lead-based paint and environmental hazards in pre-1978 housing throughout the County.

Actions planned to reduce the number of poverty-level families

According to the U.S. Census 2010-2014 American Community Survey Five-Year Estimates, approximately 34.8% of female-headed households with children were affected by poverty. Additionally, 13.5% of all youth under the age of 18 were living in poverty. Approximately 9.8% of the County of Northampton’s residents lived in poverty, which was lower than the Commonwealth of Pennsylvania where 13.5% 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 affordable housing projects with FY 2017 CDBG funds:

- Northampton County Division of Children, Family, and Youth Housing and Utility Assistance - $75,000
- Lehigh Valley Community Land Trust Scattered Site Affordable Housing Acquisition and Rehab - $200,000
- Community Action Committee of the Lehigh Valley Community Action Financial Services
Foreclosure Mitigation - $30,153

- North Penn Legal Services Fair Housing Compliance - $32,000
- Northampton County Department of Human Services Public Health Initiative - $40,000
- Lehigh Valley Center for Independent Living PLACE Program - $40,000
- North Penn Legal Service Foreclosure Mitigation for Low Income Residents and Seniors from Reverse Mortgages - $30,000
- Meals on Wheels Better Fresh Local Produce - $30,000
- Wesley Church Backpack Program - $17,000
- Second Harvest Food Bank Backpack Buddies Program - $20,000

**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 and objectives outlined in the FY 2012-2016 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.
- Northampton County 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 funds annually. The Department of Community and Economic Development staff provides help and assistance as needed to assist these
public agencies that receive CDBG funding.

During this program year, the County will fund the following activities:

- Northampton County Administration County Admin - $104,684
- North Penn Legal Services Fair Housing Compliance - $32,000
- Northampton County Department of Public Works and Parks ADA Planning Study - $75,000
- Borough of Northampton Comprehensive ADA Plan - $10,000
- Borough of North Catasauqua Barrier-Free Elevator study - $25,000
- Township of Lehigh Comprehensive ADA Plan - $10,000
- Community Action Committee of the Lehigh Valley Slate Belt Rising Plan - $20,000

**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 CDBG 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.
Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(l)(1,2,4)

Introduction

Northampton County will receive an annual allocation of CDBG funds in the amount of $1,383,422 for FY 2017. Since the County receives a CDBG 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.

<table>
<thead>
<tr>
<th>Question</th>
<th>Amount</th>
</tr>
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<tbody>
<tr>
<td>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</td>
<td>0</td>
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<tr>
<td>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.</td>
<td>0</td>
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<tr>
<td>3. The amount of surplus funds from urban renewal settlements</td>
<td>0</td>
</tr>
<tr>
<td>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</td>
<td>0</td>
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<tr>
<td>5. The amount of income from float-funded activities</td>
<td>0</td>
</tr>
</tbody>
</table>

Total Program Income: 0
Other CDBG Requirements

1. The amount of urgent need activities

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</thead>
<tbody>
<tr>
<td>The amount of urgent need activities</td>
<td>0</td>
</tr>
</tbody>
</table>

2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.

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<tbody>
<tr>
<td>Overall Benefit</td>
<td>100.00%</td>
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</tbody>
</table>

Discussion

Under the FY 2017 CDBG Program, the Northampton County will receive a grant in the amount of $1,383,422 and anticipates no program income for the year. The County will budget $276,684 for general administration which includes $32,000 for Fair Housing activities. The balance of funds ($1,106,738) will be allocated to: activities which principally benefit low and moderate income persons in the amount of $1,106,738 (100%) and $0 for the removal of slums and blight (0%).

The County makes applications available to County jurisdictions, County departments, non-profits, for-profit agencies, and other public agencies/organizations for CDBG eligible funded activities. A percentage of the County's Community Development Block Grant (CDBG) funds are awarded on a competitive basis to applicants of eligible activities. The applications are reviewed by the Department of Community and Economic Development, forwarded to the Economic Committee for recommendation, and finally submitted to the County Council for approval.