

City of Allentown Allocation Plan





OFFICE OF COMMUNITY PLANNING
AND DEVELOPMENT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

April 28, 2021

The Honorable Ray O'Connell
Mayor of Allentown
435 Hamilton Street
Allentown, PA 18101-1603

Dear Mayor O'Connell:

I am pleased to inform you of your jurisdiction's Fiscal Year (FY) 2021 allocation for HUD's HOME Investment Partnerships Program – American Rescue Plan (HOME-ARP) funding. The American Rescue Plan appropriated \$5 billion to help communities provide housing, shelter, and services for people experiencing and other qualifying populations. These HOME-ARP funds are in addition to your regular FY 2021 HOME formula allocation. This one-time funding creates a significant opportunity for you to meet the housing and service needs of your community's most vulnerable populations.

Your jurisdiction's FY 2021 HOME-ARP allocation is \$3,496,826.

HOME-ARP funding gives jurisdictions significant new resources to address their homeless assistance needs by creating affordable housing or non-congregate shelter units and providing tenant-based rental assistance or supportive services. Later this year, the Department will issue an implementing notice providing guidance on HOME-ARP, including instructions and requirements for developing a substantial amendment to your jurisdiction's FY 2021 Annual Action Plan describing your proposed use of the funds. HOME-ARP funds are available for expenditure until September, 2030.

HOME-ARP funds are allocated through the HOME formula to all participating jurisdictions that qualified for an annual HOME Program allocation for FY 2021. HOME-ARP funds must be used for individuals or families from the following qualifying populations: homeless; at-risk of homelessness; fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; other populations where providing assistance would prevent the family's homelessness or would serve those with the greatest risk of housing instability; and veterans and families that include a veteran family member that meet one of the preceding criteria.

HOME-ARP funds can be used for four eligible activities including the production or preservation of affordable housing; tenant-based rental assistance; supportive services, including homeless prevention services and housing counseling; and the purchase or development of non-congregate shelter for individuals and families experiencing homelessness. Additionally, HOME-ARP provides up to 15 percent of the allocation for administrative and planning costs of the participating jurisdiction and for subrecipients administering all or a portion of the grant. HOME-ARP can provide up to 5 percent of the grant for operating costs of Community Housing

Development Organizations (CHDOs) and other non-profit organizations, including homeless providers. Additional funding is available to these organizations for capacity building. Like other formula grant funds, HOME-ARP funds will be administered in the Integrated Disbursement and Information System (IDIS).

While your jurisdiction will not have access to HOME-ARP funds until HUD has issued an implementing notice and subsequently reviewed and accepted a substantial amendment to your FY 2021 Annual Action Plan, I urge you to begin consulting with homeless service providers, domestic violence service organizations, public housing agencies, and other organizations and agencies that assist qualifying populations in your area. Early identification of the unmet needs among these populations and consideration of potential uses of HOME-ARP funds will position your jurisdiction to design and implement its HOME-ARP Program expeditiously.

The Office of Community Planning and Development looks forward to working with you to ensure the success of this critical program. If you or any member of your staff have questions, please contact your local CPD Office Director.

Sincerely,

A handwritten signature in blue ink, appearing to read 'James', with a stylized flourish at the end.

James Arthur Jemison II
Principal Deputy Assistant Secretary
for Community Planning and Development



U.S. Department of Housing and Urban Development

**Philadelphia Office
The Wanamaker Building
100 Penn Square East
Philadelphia, Pennsylvania 19107-3380**

September 22, 2021

Via email: Leonard.Lightner@allentownpa.gov

Mr. Leonard Lightner
Director
Community and Economic Development
City of Allentown
435 Hamilton Street
Allentown, PA 18101

Dear Mr. Lightner:

The American Rescue Plan Act of 2021 appropriated \$5 billion to provide housing, services, and shelter to individuals experiencing homeless and other vulnerable populations, to be allocated by formula to jurisdictions that qualified for HOME Investment Partnerships Program allocations in Fiscal Year 2021. On September 13, 2021, the Department published a notice, titled: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program* (the Notice), which you are encouraged to review to assist in developing your program. Enclosed is the Grant Agreement for the HOME Investment Partnerships – America Rescue Plan (HOME-ARP) program:

In accordance with the Notice, and the HOME ARP Grant Agreement, a Participating Jurisdiction (PJ), as of the Federal Award Date, may use up to five percent of its total award for administrative and planning costs. Once your HOME-ARP Allocation Plan is approved by HUD, the remaining award will be made available.

**HOME Investment Partnerships - American Rescue Plan
(HOME-ARP)**

\$ 3,496,826

Transmittal of this Grant Agreement does not constitute approval of the activities described in your HOME-ARP Allocation Plan. You are reminded that you, as the PJ, are responsible for ensuring that all grant funds are used in accordance with all program requirements. An executed Grant Agreement is a legally binding agreement between the Department of Housing and Urban Development and the City of Allentown.

To establish a Line of Credit for the HOME-ARP award, it will be necessary for your agency to sign, execute and return one (1) copy of the Grant Agreement. If there is a need to add or remove individuals authorized to access the Integrated Disbursement Information System (IDIS), please submit an IDIS Online Access Request Form (HUD 27055). Also, please ensure the IDIS Online Access Request Form is notarized and returned to this office with your Grant Agreement. Additionally, if there is a need to establish or change the depository account where these funds are to be wired, a Direct Deposit Sign-Up form (SF-1199A) must be completed by your financial institution and returned to this office with a copy of a voided check.

You are reminded that certain activities are subject to the provisions of 24 CFR Part 58 (Environmental Review Procedures). Funds for such activities may not be obligated or expended until HUD has approved the release of funds in writing. A request for release of funds (RROF) must be accompanied by an environmental certification, and until the RROF is approved and notification is received, no HUD funds should be committed. If the project or activity is exempt per 24 CFR 58.34 or categorically excluded (except in extraordinary circumstances), no RROF is required.

Please execute two (2) copies of the HOME-ARP Grant Agreement with electronic signatures. In response to COVID-19, HUD authorizes you to electronically execute the grant agreement with your electronic signature. Please return one (1) copy of the agreement to this office to crystal.i.edwards@hud.gov and patricia.e.pollock@hud.gov. Please maintain a copy of the agreement with your original signature on site in your program files.

HUD congratulates the City of Allentown on its grant award, and we look forward to assisting you in accomplishing your programs goals. If you have any questions or need further information of assistance, please contact Crystal Edwards, Senior Community Planning and Development Representative at (215)861-7657 or crystal.i.edwards@hud.gov.

Sincerely,

NADAB BYNUM

Digitally signed by NADAB BYNUM
DN: cn = NADAB BYNUM, o = US, ou = U.S. Department
of Housing and Urban Development,
c = US
Date: 2021.06.22 11:02:29 -0400

Nadab O. Bynum, Director
Office of Community Planning and
Development

Enclosures

cc: Maria Quigney, HUD Grants Manager

HOME ARP Grant Agreement

Title II of the Cranston-Gonzalez National Affordable Housing Act
Assistance Listings #14.239 - HOME Investment Partnerships Program

1. Grantee Name and Address Allentown 435 Hamilton Street Room 110 Allentown, PA 18101-1699	2. Grant Number (Federal Award Identification Number (FAIN)) M21-MP420200	
	3a. Tax Identification Number 236003116	3b. Unique Entity Identifier (formerly DUNS) 068568656
	4. Appropriation Number 861/50205	5. Budget Period Start and End Date FY 2021 - 09/30/2030

6. Previous Obligation (Enter "0" for initial FY allocation)	\$0
a. Formula Funds	\$

7. Current Transaction (+ or -)	\$3,496,826.00
a. Administrative and Planning Funds Available on Federal Award Date	\$174,841.30
b. Balance of Administrative and Planning Funds	\$349,682.60
c. Balance of Formula Funds	\$2,972,302.10

8. Revised Obligation	\$
a. Formula Funds	\$

9. Special Conditions (check applicable box) <input type="checkbox"/> Not applicable <input type="checkbox"/> Attached	10. Federal Award Date (HUD Official's Signature Date) 09/20/2021
---------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------

11. Indirect Cost Rate*	12. Period of Performance Date in Box #10 - 09/30/2030															
<table border="1"> <thead> <tr> <th>Administering Agency/Dept.</th> <th>Indirect Cost Rate</th> <th>Direct Cost Base</th> </tr> </thead> <tbody> <tr><td>---</td><td>---</td><td>---</td></tr> <tr><td>---</td><td>---</td><td>---</td></tr> <tr><td>---</td><td>---</td><td>---</td></tr> <tr><td>---</td><td>---</td><td>---</td></tr> </tbody> </table>	Administering Agency/Dept.	Indirect Cost Rate	Direct Cost Base	---	---	---	---	---	---	---	---	---	---	---	---	<p>* If funding assistance will be used for payment of indirect costs pursuant to 2 CFR 200, Subpart E-Cost Principles, provide the name of the department/agency, its indirect cost rate (including if the de minimis rate is charged per 2 § CFR 200.414), and the direct cost base to which the rate will be applied. Do not include cost rates for subrecipients.</p>
Administering Agency/Dept.	Indirect Cost Rate	Direct Cost Base														
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The HOME-ARP Grant Agreement (the "Agreement") between the Department of Housing and Urban Development (HUD) and the Grantee is made pursuant to the authority of the HOME Investment Partnerships Act (42 U.S.C. 12701 et seq.) and Section 3205 of the American Rescue Plan (P.L. 117-2) (ARP). HUD regulations at 24 CFR part 92 (as may be amended from time to time), the CPD Notice entitled "Requirements for the Use of Funds in the HOME-American Rescue Plan Program" (HOME-ARP Implementation Notice), the Grantee's HOME-ARP allocation plan (as of the date of HUD's approval), and this HOME-ARP Grant Agreement, form HUD-40093a, including any special conditions (in accordance with 2 CFR 200.208), constitute part of this Agreement. HUD's payment of funds under this Agreement is subject to the Grantee's compliance with HUD's electronic funds transfer and information reporting procedures issued pursuant to 24 CFR 92.502 and the HOME-ARP Implementation Notice. To the extent authorized by HUD regulations at 24 CFR part 92, HUD may, by its execution of an amendment, deobligate funds previously awarded to the Grantee without the Grantee's execution of the amendment or other consent. The Grantee agrees that funds invested in HOME-ARP activities under the HOME-ARP Implementation Notice are repayable in accordance with the requirements of the HOME-ARP Implementation Notice. The Grantee agrees to assume all of the responsibility for environmental review, decision making, and actions, as specified and required in regulation at 24 CFR 92.352 and 24 CFR Part 58, as well as the HOME-ARP Implementation Notice.

The Grantee must comply with the applicable requirements at 2 CFR part 200, as amended, that are incorporated by the program regulations and the HOME-ARP Implementation Notice, as may be amended from time to time. Where any previous or future amendments to 2 CFR part 200 replace or renumber sections of part 200 that are cited specifically in the program regulations or HOME-ARP Implementation Notice, activities carried out under the grant after the effective date of the 2 CFR part 200 amendments will be governed by the 2 CFR part 200 requirements, as replaced or renumbered by the part 200 amendments.

The Grantee shall comply with requirements established by the Office of Management and Budget (OMB) concerning the Universal Numbering System and System for Award Management (SAM) requirements in Appendix I to 2 CFR part 200, and the Federal Funding Accountability and Transparency Act (FFATA) in Appendix A to 2 CFR part 170.

Funds remaining in the grantee's Treasury account after the end of the budget period will be cancelled and thereafter not available for obligation or expenditure for any purpose. Per 31 U.S.C. 1652, the Grantee shall not incur any obligations to be paid with such assistance after the end of the Budget Period.

13. For the U.S. Department of HUD (Name and Title of Authorized Official) Nadab O. Bynum, CPD Director	14. Signature NADAB BYNUM	15. Date 11
16. For the Grantee (Name and Title of Authorized Official) Ray O. Connell, Mayor	17. Signature Ray O. Connell	18. Date 10/26/2021

19. Check one: ☒ Initial Agreement ☐ Amendment #

20. Funding Information: HOME ARP
Source of Funds: 2021
Appropriation Code: 861/50205
PAS Code: HMX
Amount: \$3,496,826.00

21. Additional Requirements: These additional requirements are attached and incorporated into this Agreement. The Grantee agrees to these additional requirements on the use of the funds in 7., as may be amended from time to time by the Secretary.

- a) As of the Federal Award Date, the Grantee may use up to the amount identified in 7.a. of this Agreement for eligible administrative and planning costs in accordance with the HOME-ARP Implementation Notice.
- b) Until the date of HUD's acceptance of the Grantee's HOME-ARP allocation plan, the Grantee agrees that it will not obligate or expend any funds for non-administrative and planning costs, in accordance with the HOME-ARP Implementation Notice.
- c) In accordance with the HOME-ARP Implementation Notice, as of the date of acceptance by HUD of the Grantee's HOME-ARP allocation plan, HUD shall make the amount identified in line 7. of this Agreement available to the Grantee.
- d) If the Grantee does not submit a HOME-ARP allocation plan or if the Grantee's HOME-ARP allocation plan is not accepted within a reasonable period of time, as determined by HUD, the Grantee agrees that all costs incurred and HOME-ARP funds expended by the Grantee will be ineligible costs and will be repaid with non-Federal funds.

22. Special Conditions



U.S. Department of Housing and Urban Development

**Philadelphia Office
The Wanamaker Building
100 Penn Square East
Philadelphia, Pennsylvania 19107-3380**

September 22, 2021

Via email: Leonard.Lightner@allentownpa.gov

Mr. Leonard Lightner

Director

Community and Economic Development

City of Allentown

435 Hamilton Street

Allentown, PA 18101

Dear Mr. Lightner:

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Sincerely,

NADAB BYNUM

Digitally signed by Nadab O. Bynum
DN: cn = Nadab O. Bynum, o = U.S. Department
of Housing and Urban Development,
ou = Office of Administration,
email = nadab.bynum@hud.gov

Nadab O. Bynum, Director
Office of Community Planning and
Development

Enclosures

cc: Maria Quigney, HUD Grants Manager



No. 165

CITY OF ALLENTOWN

RESOLUTION

R - 2021

Introduced by the Administration on October 6, 2021

Approves the Submission of an amendment to the Action Plan to the United States Department of Housing and Urban Development

Resolved by the Council of the City of Allentown, That

WHEREAS, the City of Allentown is eligible to apply for funding through federal housing and community development programs for use within the City; and

WHEREAS, the United States Department of Housing and Urban Development requires the City to prepare an Action Plan to receive such funding; and

WHEREAS, the amendment to the Action Plan serves as the application for HOME Investment Partnership-ARP and describes how the City plans to use the American Rescue Plan.

NOW, THEREFORE, BE IT RESOLVED that the Council of the City of Allentown hereby approves of the submission to the United States Department of Housing and Urban Development of the amendment to the Action Plan for the Fiscal Year 2021.

- **What Department or bureau is Bill originating from? Where did the Initiative for the bill originate?**

The Consolidated Grants Program (CGP) legislation consists of two ordinances and one resolution and originates in the Department of Community and Economic Development.

The attached legislation, from the Department of Community and Economic Development serves as the template for the City of Allentown's application for federal HOME Investment Partnership Program (HOME). Each piece of legislation serves a specific purpose, which when combined, contain all the recommended regulatory steps need to apply for these federal funds. These are the same types of legislation presented to City Council every year. However, the actual dollar amounts, list of activities and funds available are different every year.

- **Summary and Facts of the Bill**

Establish HOME (ARP) accounts

Summary: This legislation is required to establish expenditure accounts for the City budgeting system, in addition to listing all the activities/programs which will be funded for the 2021 Consolidated Grants Program year. It provides the basis for the creation of an amendment to the Action Plan which is submitted to HUD as the application for the HOME program funds which the City received during COVID.

- **Purpose – Please include the following in your explanation:**
 - **What does the Bill do – what are the specific goals/tasks the bill seek to accomplish**
 - **What are the Benefits of doing this/Down-side of doing this**
 - **How does this Bill related to the City's Vision/Mission/Priorities**

This ordinance provides the City with the second step needed to allow the City to apply for and then access \$ 3,496,829.00 in grant funds for the Fiscal year 2021 to September 2030 program year. All activities funded comply with the HOME regulations as promulgated by HUD and allow the City to further its Community and Economic Development Initiatives. This bill provides the second step in the process which forms the basis to complete the strategies of the second year of the City of Allentown's Consolidated Plan for the period January 1, 2020 to December 31, 2025.

- **Financial Impact – Please include the following in your explanation:**
 - **Cost (Initial and ongoing)**
 - **Benefits (initial and ongoing)**

This ordinance provides the City the ability to expend \$ 3,496,826.00 in federal funds to complete a variety of activities including public services, neighborhood improvements, administration of the programs, etc. This legislation has no adverse financial impact on the City and the General Fund.

- **Funding Sources – Please include the following in your explanation:**
 - If transferring funds, please make sure bill gives specific accounts; if appropriating funds from a grant list the agency awarding the grant.

The funding sources for this ordinance are the HOME Investment Partnership Program - American Rescue Plan (HOME-ARP)

- **Priority status/Deadlines, if any**

This bill has a high priority status. We must submit the application to HUD by as soon as possible.

- **Why should Council unanimously support this bill?**

Funding decisions were made by complying with HUD's regulations, which require the City to address concerns/needs during the COVID-19 Pandemic.

Public Notice

The City of Allentown hereby announces that it will be submitting a substantial amendment to the Annual Action Plan. The amendment consists of Home Investment Partnership Program (HOME) Grant to include the HOME-ARP allocation. The city will be receiving \$3,496,826 in HOME-ARP funding. The funding will be used to create affordable rental housing and provide supportive services for shelters. The City of Allentown will host a virtual public hearing on Monday May 9, 2022, at 10am and 5pm. The link to the public hearing can be accessed on the City's website. Please email commentary no later than May 8, 2022 at 4pm to hudgrants@allentownpa.gov.

La ciudad de Allentown anuncia por la presente que presentará una enmienda sustancial al Plan de acción anual. La enmienda consiste en la Subvención del Programa de Asociación de Inversión en el Hogar (HOME) para incluir la asignación HOME-ARP. La ciudad recibirá \$3,496,826 en fondos HOME-ARP. Los fondos se utilizarán para crear viviendas de alquiler asequibles y brindar servicios de apoyo para los refugiados. La ciudad de Allentown organizará una audiencia pública virtual el lunes 9 de mayo de 2022 a las 10 a. m. y a las 5 p. m. Se puede acceder al enlace a la audiencia pública en el sitio web de la Ciudad. Envíe los comentarios por correo electrónico a más tardar el 8 de mayo de 2022 a las 4:00 p. m. a hudgrants@allentownpa.gov.

Order ID: 7186855

GROSS PRICE * : \$200.09

PACKAGE NAME: TMC Legal/Public Notices

Product(s): The Morning Call, Affidavit, PublicNoticePA.com

AdSize(s): 1 Column

Run Date(s): Saturday, April 9, 2022

Zone: Full Run

Color Spec. 4C

Preview

NOTICE

The City of Allentown hereby announces that it will be submitting a substantial amendment to the Annual Action Plan. The amendment consists of a Home Investment Partnership Program (HOME) Grant to include the HOME-ARP allocation. The city will be receiving \$3,496,826 in HOME-ARP funding. The funding will be used to create affordable rental housing and provide supportive services for city shelterers. The City of Allentown will host a virtual public hearing on Monday, May 9, 2022, at 10am and 5pm. The link to the public hearing can be accessed on the City's website. Please email commentary no later than May 8, 2022 at 4pm to hudgrants@allentownpa.gov.
7186855 4/9/22

Order ID: 7186855

* Agency Commission not included

GROSS PRICE * : \$200.09

PACKAGE NAME: TMC Legal/Public Notices

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

05/09/2022

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

City of Allentown

* b. Employer/Taxpayer Identification Number (EIN/TIN):

23-6003116

* c. Organizational DUNS:

0685696560000

d. Address:

* Street1:

435 Hamilton Street

Street2:

* City:

Allentown

County/Parish:

* State:

PA

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

18103

e. Organizational Unit:

Department Name:

Community & Economic Development

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

* First Name:

Maria

Middle Name:

* Last Name:

Quigney

Suffix:

Title: HUD Grants Manager

Organizational Affiliation:

* Telephone Number: 610-437-7761

Fax Number:

* Email: maria.quigney@allentownpa.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

United States Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME - Home Investment Partnership Program - American Rescue Plan

*** 12. Funding Opportunity Number:**

* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

City of Allentown Community Annual Action Plan

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

15

* b. Program/Project

15

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal

3,496,826.00

* b. Applicant

* c. State

* d. Local

* e. Other

* f. Program Income

3,496,826.00

* g. TOTAL

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☐

a. This application was made available to the State under the Executive Order 12372 Process for review on

☐

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☒

c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

☐

Yes

☒

No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

☒

** I AGREE

** The list of certifications and assurances, or an Internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:

* First Name:

Matt

Middle Name:

* Last Name:

Tuerk

Suffix:

* Title:

Mayor of the City of Allentown

* Telephone Number:

610-437-7761

Fax Number:

* Email:

matt.tuerk@allentownpa.gov

* Signature of Authorized Representative:



* Date Signed:

5/19/22

Applicant Assurances and Certifications

U.S. Department of Housing and Urban Development

OMB Approval No. 2501-0017
(expires 01/31/2016)

Instructions for the HUD-424-B Assurances and Certifications

As part of your application for HUD funding, you, as the official authorized to sign on behalf of your organization or as an individual must provide the following assurances and certifications. By submitting this form, you are stating that to the best of your knowledge and belief, all assertions are true and correct.

As the duly authorized representative of the applicant, I certify that the applicant [Insert below the Name and title of the Authorized Representative, name of Organization and the date of signature]:

Name: Matt Tuerk, Title: Mayor

Organization: City of Allentown, Date: 05/09/2022

1. Has the legal authority to apply for Federal assistance, has the institutional, managerial and financial capability (including funds to pay the non-Federal share of program costs) to plan, manage and complete the program as described in the application and the governing body has duly authorized the submission of the application, including these assurances and certifications, and authorized me as the official representative of the applicant to act in connection with the application and to provide any additional information as may be required.
2. Will administer the grant in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000(d)) and implementing regulations (24 CFR Part 1), which provide that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its tribally designated housing entity, is subject to the Indian Civil Rights Act (25 U.S.C. 1301-1303).
3. Will administer the grant in compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as amended, and implementing regulations at 24 CFR Part 8, and the Age Discrimination Act of 1975 (42 U.S.C. 6101-07), as amended, and implementing regulations at 24 CFR Part 146 which together provide that no person in the United States shall, on the grounds of disability or age, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance; except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.
4. Will comply with the Fair Housing Act (42 U.S.C. 3601-19), as amended, and the implementing regulations at 24 CFR Part 100, which prohibit discrimination in housing on the basis of race, color, religion, sex, disability, familial status, or national origin; except an applicant which is an Indian tribe or its instrumentality which is excluded by statute from coverage does not make this certification; and further except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.
5. Will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601) and implementing regulations at 49 CFR Part 24 and 24 CFR 42, Subpart A.
6. Will comply with the environmental requirements of the National Environmental Policy Act (42 U.S.C. 4321 et seq.) and related Federal authorities prior to the commitment or expenditure of funds for property acquisition and physical development activities subject to implementing regulations at 24 CFR parts 50 or 58.
7. That no Federal appropriated funds have been paid, or will be paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress, in connection with the awarding of this Federal grant or its extension, renewal, amendment or modification. If funds other than Federal appropriated funds have or will be paid for influencing or attempting to influence the persons listed above, I shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying. I certify that I shall require all sub awards at all tiers (including sub-grants and contracts) to similarly certify and disclose accordingly. Federally recognized Indian Tribes and tribally designated housing entities (TDHEs) established by Federally-recognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but State-recognized Indian tribes and TDHEs established under State law are not excluded from the statute's coverage.

These certifications and assurances are material representations of the fact upon which HUD can rely when awarding a grant. If it is later determined that, I the applicant, knowingly made an erroneous certification or assurance, I may be subject to criminal prosecution. HUD may also terminate the grant and take other available remedies.

ASSURANCES - CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.


PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title, or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal interest in the title of real property in accordance with awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progress reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor Matt Tuerk
APPLICANT ORGANIZATION City of Allentown	DATE SUBMITTED 05/09/22

HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

Affirmatively Further Fair Housing —The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

Uniform Relocation Act and Anti-displacement and Relocation Plan —It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.


Anti-Lobbying —To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction —The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

Section 3 —It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

HOME-ARP Certification —It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.



Signature of Authorized Official

5/9/22

Date

mayor

Title

City of Allentown Allocation Plan



I. Introduction

The City of Allentown will receive \$3,496,826 in Home Investment Partnerships - American Rescue Plan (HOME-ARP) funds from the U.S. Department of Housing and Urban Development (HUD). This supplemental funding was allocated by formula under the HOME entitlement program to address the need for homelessness assistance and supportive services. The allocation authorized by the American Rescue Plan Act of 2021, must primarily benefit individuals and families who are experiencing homelessness, at risk of homelessness, or in other vulnerable populations at greatest risk of housing instability. This plan includes 1) an outline of the consultation and public participation processes undertaken, 2) an assessment of the needs of qualifying populations and gaps in local housing and services systems, and 3) planned uses of HOME-ARP funds for prioritized populations and eligible activities.

The City of Allentown will comply with all applicable fair housing, civil rights, and nondiscrimination requirements.

HUD National Objective

The City of Allentown will utilize the primary objective of “benefit to Low- and Moderate-Income Persons or Households” to support HOME-ARP projects. Additionally, the projects will support Low-Mod Limited Clientele, which specifically assists the HOME-ARP’s qualifying populations.

II. Consultation

This HOME-ARP allocation plan was prepared in consultation with agencies whose clientele includes HOME-ARP qualifying populations. Consultation questionnaires and surveys were sent to agencies serving qualifying populations who focus on affordable rental housing, equity and inclusion, and homeless and special needs. The Lehigh Valley Regional Homeless Advisory Board, which serves the Lehigh Valley, was included. Of the 9 invited service providers, 9 answered the questionnaire. Additionally, Community Development staff from the City of Allentown convened to discuss HOME-ARP funding and how it would be utilized.

The feedback within the surveys conveyed a general agreement that a lack of affordable housing is the greatest barrier to assisting vulnerable populations with housing. The shortage of affordable rental units in the City of Allentown keeps vulnerable populations at constant risk of homelessness. This theme was often mentioned in connection with related issues like increasing rental prices and the inability to find safe and affordable housing. Area developers and non-profits have many ideas for various types of housing projects including permanent supportive housing, transitional housing, scattered site rental, and larger multi-unit development projects located within the city. Some respondents expressed a need for additional shelter units, specifically a barrier-free shelter for families. Respondents explained systemic, historical barriers, such as housing discrimination based on source of income, disability, and race persist. These issues further exacerbate the already strained housing market. Additional education and outreach can battle such barriers, many respondents spoke of the need to assist unhoused people with obtaining housing and other supportive services. Additionally, survey participants described the importance of preventing people from becoming homeless by providing rental assistance,

outreach, increased and improved mental health services, and other supportive services like case management.

Feedback received through the consultation process also suggests a need for additional shelter for families and youth. An assessment of the ongoing need for shelter beds is challenging as it depends heavily on the amount of time it takes to obtain housing for those who enter shelters. If there are sufficient permanent housing resources available, those who enter shelter will quickly be connected to housing, and fewer emergency shelter beds are needed on an ongoing basis. However, if there are limited permanent resources available, or if there are challenges to obtaining housing in a quick manner, families and individuals remain in shelter longer, and less beds become available, creating a blockage in the shelter system.

In conjunction, the City also consulted with all 90 Public Housing Authorities in Pennsylvania. Of those 90 Public Housing Authorities, 18 responded to the city's survey. Each PHA identified the need of affordable housing, and Emergency Housing Vouchers (EHV) as the highest needs of their population. They also expressed the need for landlord cooperation and expressed interest in a Landlord Engagement program. The survey and questionnaire asked agencies to rank the four eligible uses for the HOME-ARP program. Affordable Rental Housing, Non-Congregate Shelter and Supportive Services are the top priority.

Across all consultation sessions, participants highlighted the lack of affordable housing in Allentown as a driving force behind the unmet needs of those experiencing homelessness, those at risk of homelessness, and those who are at risk of housing instability.

General recommendations

- Affordable housing is lacking in the area and the creation of affordable housing would benefit the HOME-ARP Qualifying Populations
- Funding supportive services and case management is key to stabilizing populations who are at risk of homelessness or transitioning into stable housing.
- The need for wrap around services situated in a central location ranked as one of the highest needs on the YMCA survey.
- The creation of landlord/ tenant education is vital to the success of vulnerable tenants

Barriers & Challenges of Housing Instability

- Housing discrimination based on race, ethnicity, income, familial status, or disability is evident in the city.
- Overly punitive system for formerly incarcerated and sex offenders
- Awareness of barriers to housing such as bad credit and evictions
- Income requirements for occupants (required to make 3x the rent)
- Old housing stock/ unaffordable housing stock

Barriers to Affordable Rental Housing

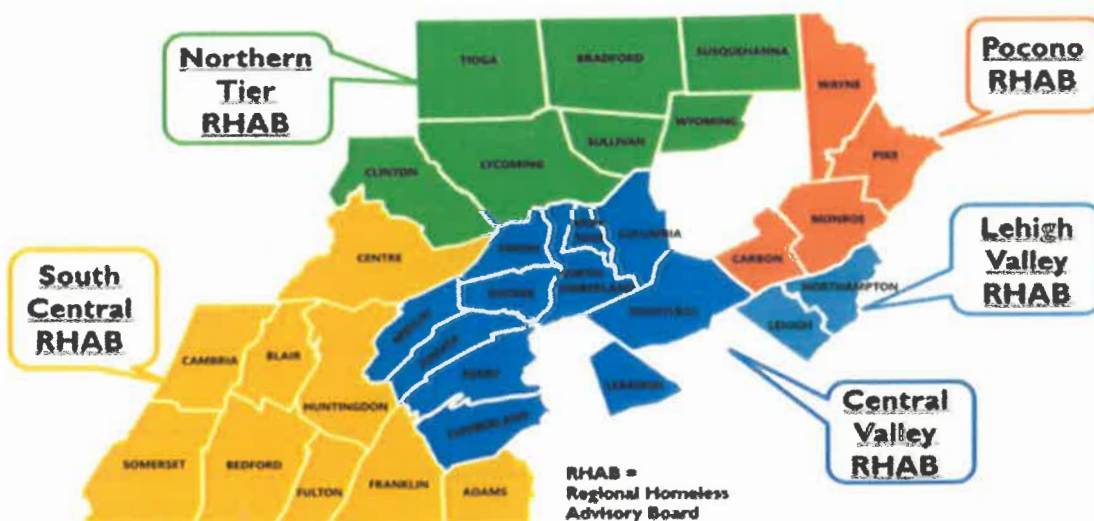
- Lack of affordable units within the city
- Landlords are not willing to make units more affordable for low-income tenants
- The city has old housing stock that needs to be upgraded for safety reasons
- Lack of section 8 vouchers and rentals makes it hard to find suitable living arrangement

- *Barriers to the Homeless & Disabled*
- Lack of case management and supportive services do not ensure client success
- There is a lack of ADA compliant apartments within the city
- Coordinated Entry has long wait times via telephone
- Waiting lists for shelter can be 3+ months
- There is only one rapid rehousing agency that serves city residents

Eastern Pennsylvania Continuum of Care / Lehigh Valley Regional Homeless Advisory Board

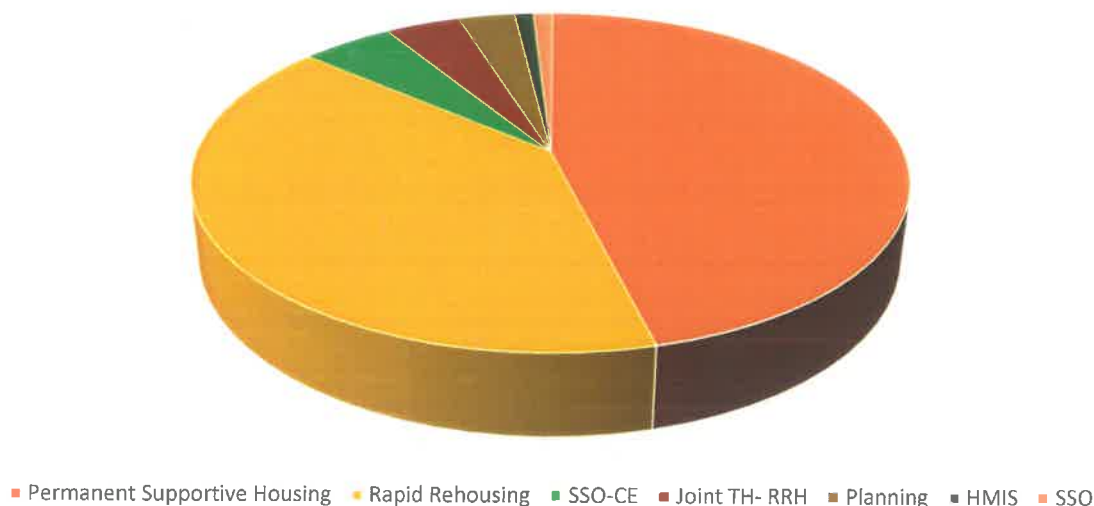
Since 2005, the City of Allentown has participated in the regional CoC process, led by the Eastern Pennsylvania CoC, and coordinated at a local level by the Lehigh Valley Regional Homeless Advisory Board (RHAB). Within the region, the Lehigh Valley RHAB encompasses Lehigh and Northampton Counties, the cities of Allentown, Bethlehem and Easton. Each year, the Lehigh Valley RHAB applies for competitive federal grants for the region to provide homeless housing and supportive services. The Eastern Pennsylvania CoC serves as the primary decision-making group for the CoC process. Its responsibilities include ensuring representation of key stakeholders; setting the agenda for full CoC planning meetings; conducting the annual homeless single Point-in-Time count; overseeing the various subcommittees and working groups; completing the annual CoC application; and assisting in reviewing programs, activities, data, and all other efforts that will eliminate homelessness and improve the well-being of homeless persons and families in the northeast region.

The mission of the Eastern PA Continuum of Care (CoC) is to end homelessness throughout its geographic region, which encompasses 33 counties, primarily rural, in the eastern part of Pennsylvania. Representatives of relevant organizations in these counties have come together to establish the CoC in order to carry out specific responsibilities laid out by federal government in advancing efforts to end homelessness.



Eastern PA CoC Jurisdiction Map

Coc Funding: Where are the resources going?



Catholic Charities

Private nonprofit social service agency assisting families and individuals across our five-county service region. They offer services to meet the needs of people in our community who need support, care and understanding. The mission of Catholic Charities Diocese of Allentown is to provide compassionate human services with respect for the sanctity of all human life.

Victory House

Since 1985, when it was known as Center City Ministries, Victory House of the Lehigh Valley has been providing shelter and transitional services to homeless men, many who have been homeless veterans. Today, after 35+ years of service, nearly 4,000 men have benefitted from the transitional programs at Victory House, enabling them to regain the unity of family life in the community

Turning Point of the Lehigh Valley

TPLV is the only shelter in the area dedicated to serving women who are survivors of domestic violence. They have been in operation since 1978 and have served over 85,000 people. Not only do they provide shelter, but also a 24-hour helpline, counseling, legal advocacy, and outreach education.

Sixth Street Shelter- CALV

A long-standing program of Community Action Lehigh Valley, one of the region's largest nonprofits. The Sixth Street Shelter works to mitigate the effects of poverty and homelessness through its mission to help families set and reach their goals through intensive case management, in-house programming, and referrals to appropriate mainstream services, including other LVRHAB partner agencies and municipal entities. The program is unique because families of any configuration (including those with fathers and teenaged boys, multi-generational families, and those from the LGBTQ+ community) stay together in their own private apartments. The 60-

to 90-day stay in the Shelter enables them to begin to stabilize their income and address the problems that led to their homelessness. Community Action's Senior Planner and Compliance Manager serves on the LVRHAB governing board.

Salvation Army

Designed to provide food and emergency housing to women and children in need. Underlying this program is a motivation to identify the causes of homelessness and work to alleviate or eliminate homelessness at its source. During a stay at a Salvation Army shelter, clients will participate in programs and life-skill classes developed to promote self-sufficiency and personal development. The Salvation Army also works with clients to help them transition into a more permanent housing situation. All guests at the shelter are provided with a caseworker who works with them to develop a Housing Stability Plan. This plan is a way of assessing and identifying resources which may be needed. The caseworker is to assist the individual in connecting to resources and providing proper referrals. The caseworker is also available to help complete on-line public assistance and food stamp applications along with the completion of social security applications. Community representatives are also present at the shelter to assist individuals in the completion of applications and to assist with referrals for medical assistance and childcare. Salvation Army's Allentown Corps is an all-encompassing downtown facility that is committed to providing the city's youth with an array of programs and opportunities. Through the Youth Enrichment Program, They offer children residing at or below the poverty level (ESG funds will focus on children experiencing homelessness) with structured academic and recreational opportunities that they otherwise may not have. To program promotes and advances the development of each child's reading and comprehension abilities, our lesson plans incorporate read-aloud and shared reading and a wide-range of opportunities for practice during small-group and independent reading sessions. Daily physical fitness activities like basketball, dodgeball, core fitness, and dance are designed to encourage maximum participation and fun for children. The Salvation Army is an active member of the Lehigh Valley Regional Homeless Advisory Board.

North Penn Legal Services

North Penn Legal Services is a nonprofit organization providing civil legal aid to low-income residents of Northeastern Pennsylvania. They provide legal assistance so that people can know their rights and free legal representation in non-criminal matters such as eviction from housing, discrimination, family law, and consumer protection issues. North Penn provides free legal aid services on civil cases to low-income families, individuals, and groups in Northeastern Pennsylvania every day. Services include individual representation (ranging from document preparation to litigation), information, referral and advice through a telephone helpline, community legal education, and support for those clients who will be taking responsibility for handling some or all aspects of their own issue.

Lehigh Valley Center for Independent Living (LVCIL)

The LVCIL is an organization that serves people with disabilities, and their family members living in Lehigh and Northampton Counties. They are one of the seventeen centers that is governed, managed, and staffed by a majority of persons with disabilities. The LVCIL provides

information and referral, advocacy, peer support and independent living skills for people living with disabilities.

VAST

Valley Against Sex Trafficking is the only agency in the area that serves Human Trafficking Victims. Their mission is to collaborate, educate, and advocate on behalf of survivors. VAST empowers survivors and encourages the community to act in the anti-trafficking movement.

III. Public Participation

Public Participation

On April 14, 2022, a public notice regarding availability of the HOME-ARP application plan was published in the Morning Call. The plan was available for review and comment from April 14, 2022, through May 8, 2022, and a public hearing was held on May 9, 2022. The city also hosted 2 public hearings on May 9, 2022, at 10am and 5pm.

No one was in attendance for the hearing on May 9, 2022, at 10am.

No one was in attendance for the hearing on May 9, 2022, at 5pm.

In efforts to broaden public participation, the City of Allentown went above and beyond the minimum requirements. The public had 24 days to solicit input and receive public comments in regard to the HOME-ARP funding. Comments were accepted in person, via telephone and email. The City of Allentown also posted flyers to advertise the hearing in English and Spanish. They were posted in City Hall on the first, second and third floor lobbies. The photos are attached.

Summary of comments received through the public participation process

No comments were received during the public comment period.

Summary of comments not accepted and why

N/A- No comments were received

IV. Needs Assessment and Gaps Analysis

The City of Allentown is the third largest City in Pennsylvania, with one of the oldest existing housing stocks in the nation. Allentown is also centralized around major cities making it a hub for rental housing, service-based jobs, and avaricious landlords. These variables coupled with COVID-19 shutdowns has left residents unemployed, unable to pay rent or homeless.

It is a challenge to determine the exact number of households who experience homelessness, as their experiences and vulnerabilities are dynamic. During consultation, agencies disclosed that cost burdened renters, those at risk of homelessness, persons experiencing homelessness and those who are chronically homeless are among the most difficult to serve. According to the HUD

Comprehensive Housing Affordability Strategy Data, approximately 24,500 renters in Allentown are spending between 30% and 50% of their income on rent.

The lack of affordable housing in the Lehigh Valley plays a key role in homelessness, where HUD listed the Fair Market Rent (FMR) in 2021 as \$1,139 for a 2-bedroom unit. According to the National Low-Income Housing Coalition, the income needed to afford the FMR for a 2-bedroom unit is \$41,040 or an hourly wage of \$19.73 or 2.7 minimum wage jobs. The minimum wage in Pennsylvania is \$7.25, with about 10% of the population in PA making minimum wage according to the United States Bureau of Labor Statistics.

In the 2021 Unsheltered PIT Count, 89 unsheltered individuals (made up of 81 households) were experiencing homelessness in the Lehigh Valley. An additional 86 people were sheltered in the emergency winter facilities operated in Allentown and Bethlehem; many of these people are unsheltered during other times of the year. Of the 89 unsheltered people, three were transition aged youth (18-24 years old), 25 were experiencing chronic homelessness, 12 had chronic substance abuse issues, 37 had a disability, three were veterans, and four were victims of domestic violence.

According to data from the Coordinated Entry System, in 2021, 7,334 households were enrolled in the Homeless Management Information System (HMIS) in the Eastern Pennsylvania Continuum of Care; this was a 50% increase over 2019. 17% of those households were in the Lehigh Valley, where 1,121 household were enrolled (749 in Lehigh County and 372 in Northampton County). 58% were assessed as “literally homeless” and 42% were “at risk” of homelessness. 47% (527) of the households came from the city of Allentown, 11.6% (131) from Bethlehem and 9% (101) from Easton. The remaining 32.2% (362) came from the rural and suburban communities across the Valley or from out of the area. Of the households enrolled, 37% (413) were families with children and 19% (212) were fleeing/survivors of domestic violence. An estimated 15% were unaccompanied youth ages 18-24.

Data from the 2021 Point-in-Time Count of sheltered households determined that on the night of January 20, 2021, 300 households made up of 499 individuals were experiencing homelessness (there was no unsheltered count due to COVID-19). This represented 33% of the total households that were experiencing homelessness in the Eastern PA Continuum of Care.

Based on previous years, an estimated 50% of households indicated that someone in the household had a mental health diagnosis, 25% were chronically homeless and 11% had experienced domestic violence in the home. Data from January-May 2020 compared with the same time period for 2021 indicates a dramatic increase in enrollments (Category 1 and 4) – 150 in 2020 versus 471 this year, an increase of 245%. The primary factor in this difference was the COVID-19 pandemic, which constricted the movement of people during the first part of 2020.

For the HOME-ARP Qualifying Populations, the COVID-19 crisis is making an already challenging situation even more so. The pandemic and resulting economic downturn are impacting low-income residents at a disproportionate rate. Experts have noted that this recession is the first driven by service-based jobs rather than manufacturing jobs, with the hardest hit industries being accommodation and food services, arts, entertainment, and recreation. These

generally low-paying service jobs are often the ones available to the people local agencies serve. National Public Radio put it starkly: women are bearing the brunt of the coronavirus job losses and will continue to do so. Caseworkers report that individuals and families are struggling to work during the crisis due to layoffs, a scarcity of jobs, and the lack of childcare. Further, the Pennsylvania Housing Alliance estimates that at least 15% of renters (or 200,000 households) will lose their jobs or face reduced hours due to COVID-19. More alarming, the Lehigh Valley Planning Commission estimates almost half of all Lehigh Valley households now stand at risk of eviction or foreclosure due to changes in income.

In addition to the aforementioned barriers, other challenges to securing safe and appropriate housing are numerous. The waiting lists at all five of the Lehigh Valley's Housing Authorities are currently closed (the Allentown Housing Authority will receive 43 housing vouchers through the American Rescue Act – those are the only new vouchers coming into the Lehigh Valley as part of the plan). Even when they are open, the wait for housing can take several years [Why the Lehigh Valley will soon see a flood of home foreclosures – The Morning Call \(mcall.com\)](https://www.mcall.com/story/news/lehigh-valley/2020/04/29/why-the-lehigh-valley-will-soon-see-a-flood-of-home-foreclosures-the-morning-call-mcall-com/5611112002/).

Requirements exacerbated by COVID-19 and the resulting economic downturn, including demanding tenants to make three and a half times the rent in income, have a decent credit score, a clear background check, prior rental history, and no history of eviction make it very difficult for those applying to qualify. Those who are disabled and are in the process of applying for or waiting to receive benefits suffer from housing instability during that waiting period and after because all of their income is being used for housing purposes.

Providers in the Lehigh Valley also have identified that lack of access to psychiatrists to provide mental health diagnosis and medication management and lack of access to behavioral health services continue to be a challenge for individuals with mental and behavioral health issues. This lack of service can prohibit participants from gaining and maintaining stable, safe and permanent housing.

The lack of access to affordable childcare – in terms of proximity, vacancy rates and childcare subsidies – can be a challenge to working families and may impact parent and caregivers' ability to obtain and maintain employment and ultimately impact permanent housing stability. Larger families (five or more persons in the household) face additional barriers to stable housing.

A 2021 gaps analysis using Coordinated Entry System data conducted by Diana T. Myers & Associates of the Eastern Pennsylvania Continuum of Care indicated that the Lehigh Valley had the lowest percentage of households enrolled/placed in permanent housing (4%) and the largest percentage of active households (67%) on the By-Name List, demonstrating the need for more resources to place people in shelter and safe and stable housing. For the City of Allentown, the need was particularly acute for Rapid Rehousing and affordable housing; the need for emergency shelter was also indicated because the Lehigh Valley has the largest number of people experiencing chronic homelessness in the Continuum.

Rapid Rehousing Annual Demand vs. Supply, by RHAB	Households needing RRH	RRH Units- excluding SSFF	Current RRH Capacity to Meet Demand
Central Valley	514	43	8%
Lehigh Valley	500	30	6%
Northern Tier	309	59	19%
Pocono	235	47	20%
South Central	984	277	28%
All	2542	456	18%

Source: Eastern PA CoC Gap Analysis 2021

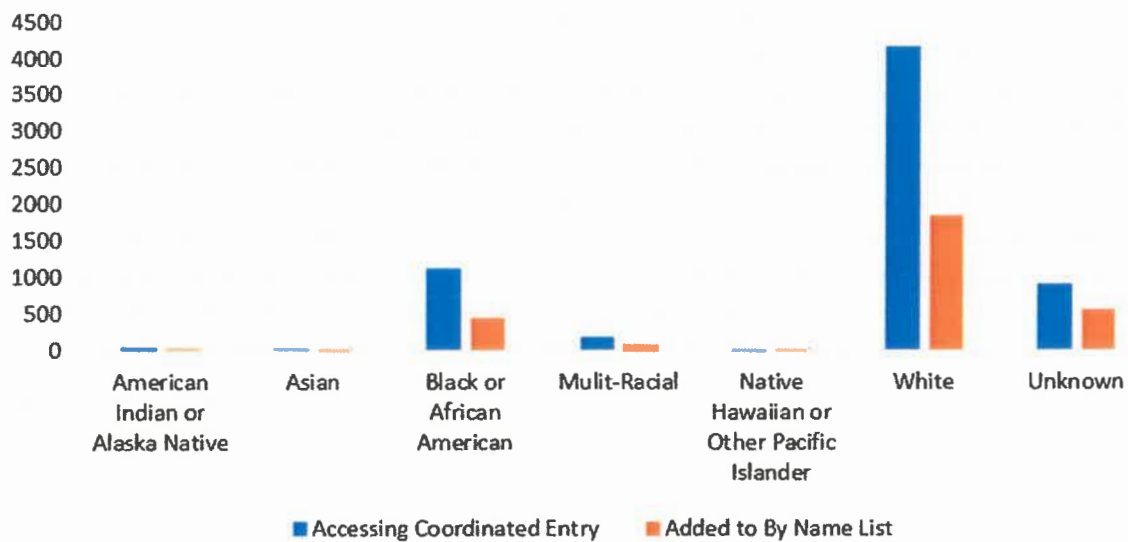
Local Poverty Rates	Pennsylvania	Lehigh County	Allentown
Median Household Income	\$61,744	\$63,897	\$27,059
Poverty	12.4%	12.5%	38.5%
Child Poverty	17.6%	19.5%	50.8%
Unemployment Rate	5.3%	5.8%	13.3%
SNAP Benefits	13.3%	14%	57.2%

Source: Eastern PA CoC Gap Analysis 2021

Housing Indicators	Pennsylvania	Lehigh County	Allentown
Renter Occupied Housing Units	31.1%	35.6%	68.2%
Owner Occupied Units	68.9%	64.4%	17.4%
Cost Burdened Renters	47.7%	52.6%	55%
Cost Burdened Owners	27.5%	25.4%	26.5%
Built Before 1939	26.2%	23.3%	51.8%

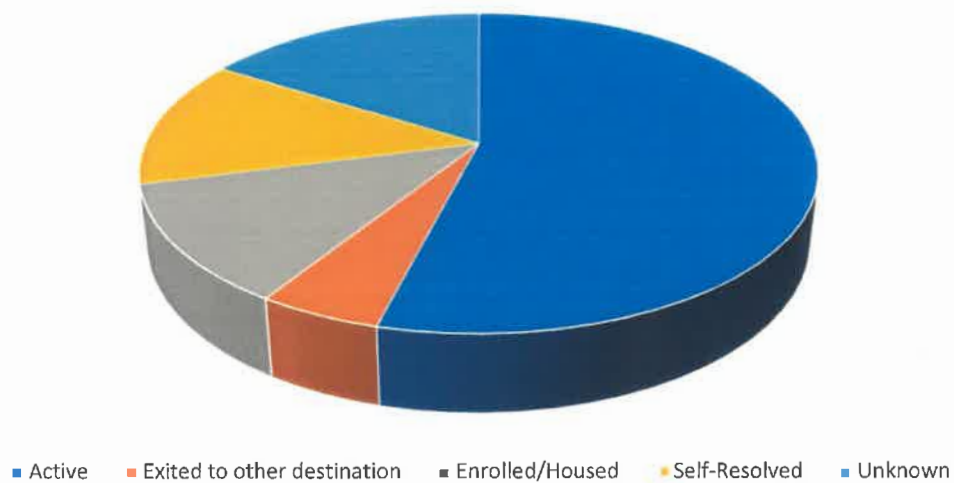
Source: Eastern PA CoC Gap Analysis 2021

Coordinated Entry by Race- Accessing Coordinated Entry and Added to the By Name List

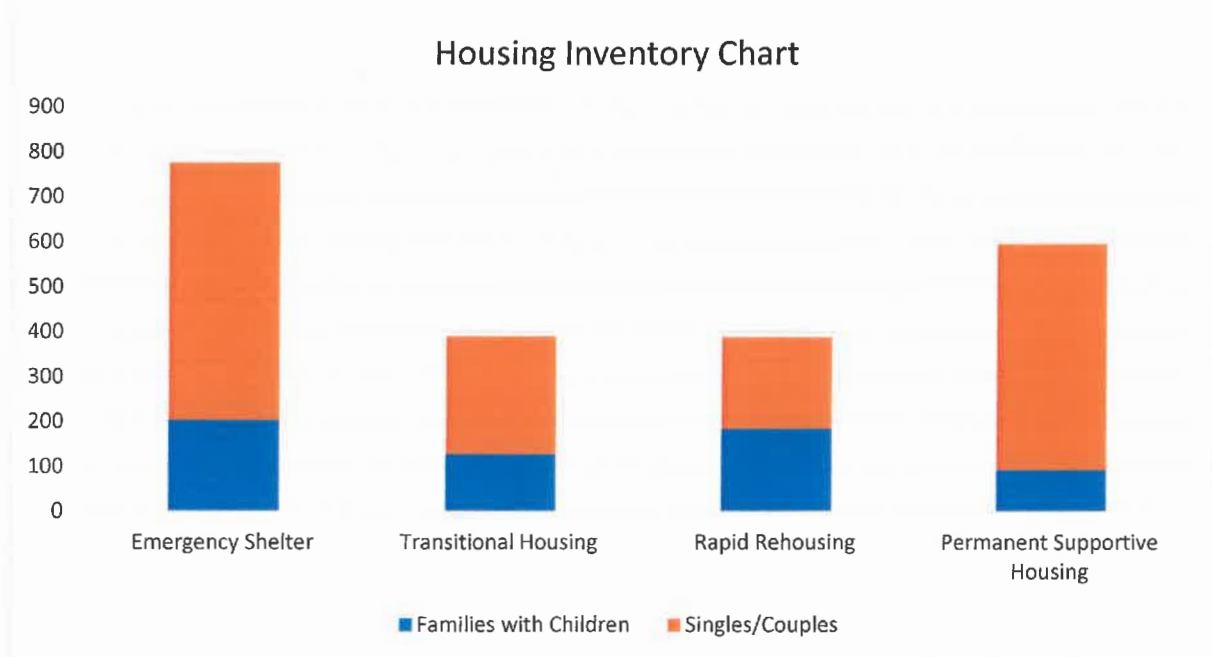


Source: Eastern PA CoC Gap Analysis 2021

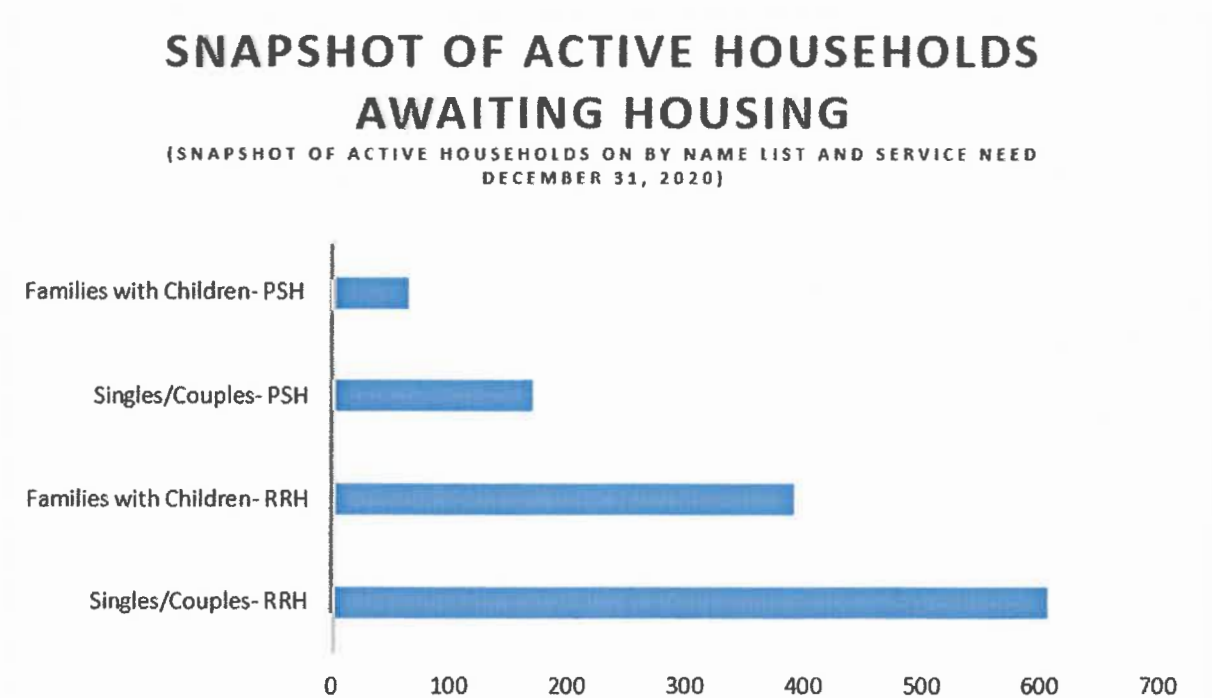
Coordinated Entry Overview of All Households



Source: Eastern PA CoC Gap Analysis 2021

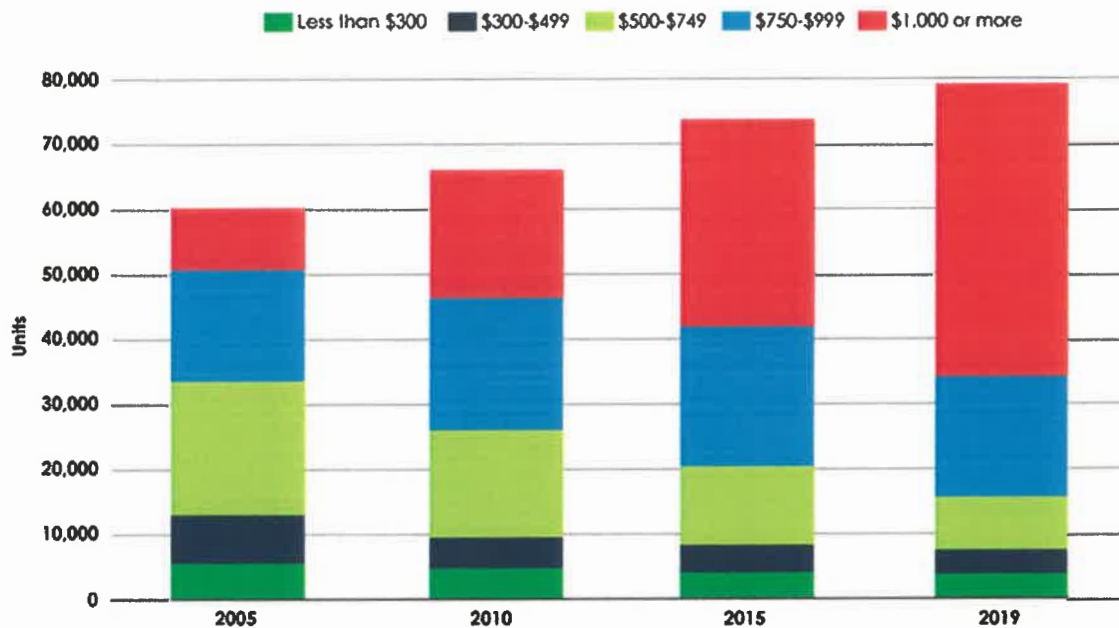


Source: Eastern PA CoC Gap Analysis 2021



Source: Eastern PA CoC Gap Analysis 2021

Lehigh Valley Rental Units by Price 2005-2019



Sources: Lehigh Valley Planning Commission and U.S. Census Bureau ACS 1 Year and 5 Year Estimates

OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	711	204	504	0	11								
Transitional Housing	362	130	299	0	62								
Permanent Supportive Housing	412	138	744	0	381								
Other Permanent Housing						58	73	4	0				
Sheltered Homeless						131	505	36	204				
Unsheltered Homeless						0	0	0	0				
Current Gap										1,485	472	1,547	0

V. Describe the size and demographic composition of the qualifying populations within the Participating Jurisdiction's boundaries:

The City of Allentown will provide access to all HOME-ARP projects and activities to qualifying populations listed within the HOME-ARP guidelines. The diversity of Allentown is

one to be proud of. The population of Allentown is approximately 128,000 and continues to grow at a rapid pace. With about 51% of the population being female, and approximately 47% of households speak another language other than English. According to the 2020 Census Data, the city consists of a large Hispanic/Latino population, approximately 26% or 31,410 of Allentown residents live in poverty, compared to the United States average of 13.4%. Due to the lack of safe, affordable housing in the city, families and individuals can be one missed paycheck away from losing their housing. The shelters within the city cannot accommodate the number of city residents that are in need. According to the Eastern PA CoC Gap Analysis, Lehigh County saw the highest number of households accessing the Coordinated Entry Assessment. With shelters have a lengthy waiting list, households may end up street homeless, or couch surfing, which can cause the spread of COVID-19.

Sheltered & Unsheltered Homeless (QP 1):

Each year, in January the Eastern Pennsylvania CoC conducts a Point in Time (PIT) count of who is experiencing homelessness in the city and surrounding areas. In addition to counting anyone who is in an emergency shelter on that night, street outreach is also conducted to identify anyone rough sleeping or in a place not meant for human habitation. When used with other data, it can provide essential information on the state of Allentown's homeless population. The 2021 Point in Time Count showed 57 people were chronically homeless and a total of 957 people were experiencing homelessness on that given night. The Point in Time Count suggests that homelessness is increasing among families with children. The 2021 count identified 420 households with at least one child who is experiencing homelessness.

At Risk of Homelessness (QP 2):

HUD defines those at risk of homelessness as individuals and families who have an income below 30% of the area median income. Those who fall within this category do not have sufficient resources or support systems to prevent them from becoming homeless or live with housing instability. In Allentown, there are 8935 households that are at or below 30% AMI, and a majority of those with this income level are renters. These renters are likely to live on the financial edge and may be at risk of a housing crisis event or homelessness.

Human Trafficking (QP 3)

According to the Pennsylvania Victims Services Needs Assessment, human trafficking victims were the most under/served population by victim type in the state. From 2014 to the end of 2019, the Villanova Commercial Sexual Exploitation Institute reported that 586 trafficking offenses were charged; Lehigh County was among the top counties in the state with the most human trafficking cases. Since 2007, the state has had 1337 cases of human trafficking. In 2018 and 2019 alone, Pennsylvania had 401 cases of human trafficking, over 621 victims that were identified, 215 traffickers, and 101 trafficking businesses. Of those cases, 315 were cases of sex trafficking, 35 of labor trafficking, and 25 cases of both.

Domestic Violence (QP 3)

Unfortunately, Pennsylvania is not immune to domestic violence. During 2021, the occurrence of domestic violence increased drastically, due to COVID-19 shutdowns, the pandemic created an idyllic setting for domestic violence. The restrictions put into place increased the amount of time victims of domestic violence have to spend at home with their abusive partner. The United Nations Populations Fund estimates a 20% increase in intimate partner violence due to the quarantine and lockdown. Within Lehigh County, Turning Point of the Lehigh Valley serves survivors by supporting them with shelter, advocacy, counseling, and other vital services. Within Pennsylvania, 37.1% of women and 30.4% of men experience intimate partner violence, intimate partner sexual violence and stalking in their lifetimes (National Coalition Against Domestic Violence).

Other Populations (QP 4)

In addition to the qualifying populations listed above, the City of Allentown will provide services to those who are requiring services to prevent homelessness, and those who are at greatest risk of housing instability. Those who are at risk of housing instability can be defined as “ Annual income \leq 30% of area median income and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs) or Annual income \leq 50% of area median income and meets one of the conditions in “At risk of homelessness” definition at §91.5. Additionally, this includes households who have been qualified as homeless and are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed and who need additional housing assistance or supportive services to avoid a return to homelessness. According to the Lehigh Valley Planning Commission, one in three Allentownians are paying more than recommended share of their income to maintain their residence. The sky-high rents are straining low- and moderate-income household finances. Additionally, 57% of the region’s apartments exceed \$1,000 per month, compared to 43% in previous years.

Veterans

The state of Pennsylvania works tirelessly to assist homeless veterans with housing and other needed services. Within Pennsylvania, 977 homeless veterans were counted in the annual Point in Time count in 2020. Unfortunately, in Allentown the affordable housing needed for veterans is lacking. With the assistance of Emergency Housing Vouchers, Veterans may be able to find safe and stable housing. Additionally, the HUD Veterans Affairs Supportive Housing (VASH) in Pennsylvania supplies Housing Choice Vouchers , case management services, and clinical services to participating veterans. The HUD VASH program is an effective program, however, due to the lack of vouchers, available units and case management services make it difficult to serve this vulnerable population. The city also understands that Veterans and Veteran family members that meet the criteria for one of the qualifying populations are eligible to receive HOME-ARP assistance.

VI. Identify and consider resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, affordable and permanent supportive rental housing:

The 2021 Housing Inventory Count identified 2,153 beds in the Eastern PA CoC. This includes emergency shelter, transitional housing, rapid rehousing, and permanent supportive housing. In addition, the city also has several HUD funded buildings that serve low-income households, the disabled, and the elderly.

The City of Allentown receives approximately \$200,000 annually in Emergency Solutions Grants (ESG) funding. This is allocated to the 3 shelters located in the city. Those shelters include the Sixth Street Shelter, The Salvation Army- Hospitality House, and the Allentown Rescue Mission. The city's ESG funding is divided among these shelters for general operating expenses. In addition, the city is allocated \$2,300,000 in Community Development Block Grant (CDBG) funding. This funding is dispersed to local nonprofits, code enforcement, and neighborhood stabilization. The city also receives approximately \$960,000 in HOME Investment Partnership Program funding to promote safe, affordable housing.

In recent years, local nonprofits have undertaken a number of strategies to serve those at risk of homelessness. One strategy that has expanded is diverse services, and rapid rehousing. These programs assist families with preserving current housing and finding a new affordable rental unit while assisting with first month rent and security deposit. Similarly, the City of Allentown created its own rental assistance program during the height of the pandemic. The city assisted approximately 150 households with overdue rent, which prevented eviction.

The Emergency Housing Voucher (EHV) program is funded through the American Rescue Plan Act (ARPA). HUD provided 43 vouchers to the Allentown Housing Authority to assist individuals and families who are homeless, at-risk of homelessness, fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking or human trafficking, or were recently homeless, or have a high risk of housing instability. These vouchers will be utilized to support those who are most vulnerable, however the lack of voucher mobility and safe, affordable housing in Allentown makes it almost impossible to find a suitable unit.

VII. Identify any gaps within the current shelter and housing inventory as well as the service delivery system

The following gaps were identified within the allocation plan through the analysis of data, evaluation of services and by consultation completion.

- Additional safe, sanitary affordable housing is needed in Allentown
- Supportive Services and non-congregate shelter for individuals and families who are homeless
- Lack of availability and increasing rents are gentrifying the city
- More Emergency Housing Vouchers are needed
- Landlord Tenant Education is vital for rental success

VIII. Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definitions of “other populations” as established in the HOME-ARP notice:

The City of Allentown does not plan to include such conditions in its definition of “other populations”

IX. Identify priority needs of qualifying populations:

The housing and supportive services needs of the qualifying populations overlap and are similar to the needs of the low-income population as a whole. All qualifying populations would benefit from an increased number of affordable housing units, and increased affordability in the housing market. Increasing rents and limited inventory has increased instability among cost burdened and low-income renters and those at risk of homelessness. Among those who are experiencing homelessness, the lack of affordable rental units causes a blockage in the availability of permanent housing options, creating longer episodes of homelessness, and leading to fewer households becoming stably housed overall. In addition to housing needs, transportation, physical health, mental health, and employment services are high priorities.

Households at risk of housing instability need support to stay housed. While many families may gain stability through housing assistance, other families need more affordable housing options. However, most of these households also need a livable wage and supportive services to create long-term self-sufficiency.

In February 2021, The YMCA Warming Station in Allentown conducted a survey to identify the needs of their homeless population. Sixty-nine homeless individuals participated in the survey and identified the following needs:

- Affordable Housing
- Supportive Services
- Year-Round Overnight Shelter
- Mental Health Treatment
- Employment Services
- Physical Health Treatment
- Transportation

Feedback received through the consultation process suggests a need for additional low-barrier shelter for individuals and families and allow flexible space that can transition between shelter and an affordable rental unit. An assessment of the ongoing need for shelter beds is challenging as it depends heavily on the amount of time it takes to obtain housing for those who enter shelter. If there are sufficient permanent affordable housing resources available, and those who enter shelter are quickly connected to housing, fewer emergency shelter beds are needed on an ongoing basis. However, if there are limited permanent resources available, or if there are challenges to

obtaining housing in a quick manner, families and individuals remain in shelters longer, and less beds become available.

In 2021, the Lehigh Valley landed among the top 10 regions with the highest rates of super commuters before the pandemic. In 2019, 4.4 percent of the workforce in the Lehigh Valley, commuted 90 or more minutes to work. Super commuters have grown by 26% since 2010, more than twice the rate of the region's workforce. It is obvious why the Lehigh Valley ranked No. 7 considering the Valley's proximity to New York City (90 miles) and Philadelphia (60 miles). The uptick in households moving to the area continues to rise, due to the affordability compared to living in the larger cities. Rent in super commuting hotspots continue to rise steadily, according to Apartmentlist.com.

The lack of available homes and other policies to ensure the creation of affordable housing is also a challenge in Allentown. This is especially worrisome given the influx of luxury apartment towers under construction. The Lehigh Valley Planning Commission notes that the number of renters in the Lehigh Valley has increased by 7,690 since 2012, which they attribute to a national trend towards urban living. Furthermore, the Commission reports 700 new luxury apartments built in Allentown since 2012. In addition, as of 2021 the average rent in Allentown is \$1,316.00, a 2018 report from Upside Allentown indicates that median housing sales prices have risen by 39% within the Neighborhood Improvement Zone (NIZ). As of 2021 the median sale price for a home in Allentown, is \$260,000.00, the low to moderate income population cannot afford this current market.

The city currently has 5,053,106 dwellings with 1,572,128 being rental units. The estimated renter median household income in Allentown is \$39,581, which is about 30% of the average median income. The average two-bedroom apartment in Allentown has risen by 11% making it impossible for low- and moderate-income residents to live in the area.

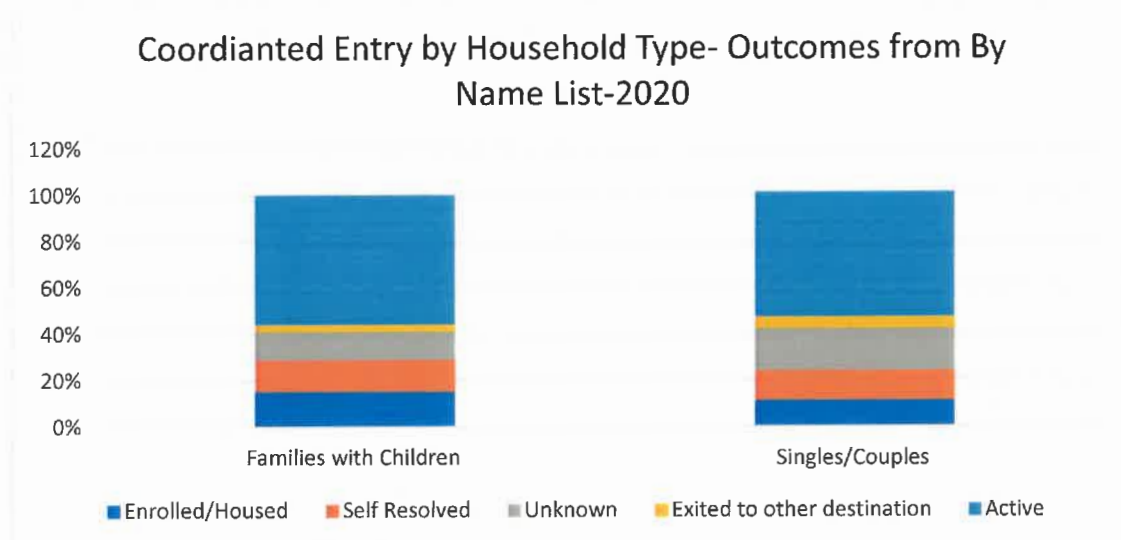
X. Explain how the level of needs and gaps in its shelter and housing inventory and service delivery systems based on the data presented in the plan were determined:

In addition to the feedback received through surveys, questionnaires and consultation sessions, a number of data sources were reviewed to determine the needs and gaps of qualifying populations. The following data sources were consulted:

- Census Bureau American Community Survey (ACS) data
- Allentown Vision 2030
- Lehigh Valley Regional Homeless Advisory Board Gap Analysis
- The Eviction Lab
- Eastern Pennsylvania Continuum of Care (CoC)
- U.S. Department of Housing and Urban Development
- City of Allentown Analysis of Impediments

Collectively, the data suggests that there is a lack of shelter and permanent, affordable housing resources for families and individuals. Of the 6,468 households who accessed coordinated entry

in 2020, 54% of them are still active within the system, due to the lack of shelter and affordable housing within the City of Allentown. The needs identified in these efforts were in line with the data presented: a need for affordable housing, and more supportive services for the homeless and those at risk of homelessness. The data and analysis offered in this allocation plan will help the City of Allentown continue to identify needs and assess how the HOME-ARP funds will be allocated.



XI. Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients, and/or contractors and whether the PJ will administer eligible activities directly:

The City of Allentown will release a notice of intent to apply (NOI) for HOME-ARP funding. The notice seeks applications from organizations with the capacity to successfully implement projects supporting the prioritized HOME-ARP populations and activities.

30 days prior to the HOME-ARP application being available, a public notice was be advertised. A public hearing date is also established at this time. At said hearing, the public and interested parties can ask questions and address concerns they may have.

The HOME-ARP application will be made available to the public on the city website for 30 days. At this time, agencies may continue to ask questions or address any concerns they may have.

XII. Use Of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 312,290.00		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 3,000,000.00		
Non-Profit Operating	\$ 0	# %	5%
Non-Profit Capacity Building	\$ 0	# %	5%
Administration and Planning	\$ 184,536.00	5.3 %	15%
Total HOME ARP Allocation	\$ 3,496,826.00		

XIII. Distribution of Funds to Subrecipients

The City of Allentown will be not release funds from the HOME-ARP allocation to a subrecipient prior to HUD's acceptance of the HOME-ARP allocation. Once the allocation plan has been accepted, the city will transcribe contracts for those who will be awarded.

The City of Allentown is not prioritizing one qualifying population over another.

XIV: Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

The consultation questionnaire and survey identified qualifying populations whose needs will be met with HOME-ARP funds. Most participating agencies identified affordable housing as their top priority. Participants explained that the lack of safe, affordable housing stock creates a barrier for those living in the city. The low housing stock and skyrocketed rent has created cost burdened renter and homeowners, the City of Allentown sits way above the national average, which is 30%. This population is not well served through the existing housing and homeless shelter system.

HOME – ARP funds will only be used for individuals or families who are part of a qualifying population. This includes veterans and families that include a veteran family member that meet one of the preceding criteria.

Additionally, there is strong evidence that supplying supportive services to those who are homeless or reside in unstable housing will reduce eviction and homelessness in the long run. The qualifying populations will be connected to the long-term financial and social supports needed to prevent future housing instability and homelessness.

Overall, Allentown's analysis of these needs supported the development of this plan and proposed eligible activities. The city hopes that this plan and targeted funding priorities will result in a sustained service delivery system and housing affordability.

Rental Housing Eligible Activities:

- Acquisition
- Construction
- Rehabilitation

- Acquisition of vacant land or demolition permitted only with respect to specific HOME-ARP projects with construction expected to begin within 12 months of commitment.

Support Service Eligible Activities include:

- Child Care
- Educational Services
- Employment Assistance & Job Training
- Food
- Housing Search and Counseling Services
- Legal Services
- Life Skills Training
- Mental Health Services
- Outpatient Health Services
- Outreach Services
- Substance Abuse Treatment Services
- Transportation
- Case Management
- Mediation
- Credit Repair
- Landlord/Tenant Liaison
- Services for Special Populations
- Financial Assistance Costs

X. Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

As noted in the needs assessment, there is a strong need for more affordable housing in Allentown, Pennsylvania. To address this urgent need, the city has allocated \$3,000,000 in HOME-ARP funding for the development and creation of affordable housing. The city estimates that with this funding, it will create approximately 50 affordable rental housing units. In addition, the city will allocate \$312,290 for supportive services and \$184,536 for administration and planning.

XVI. Describe the specific affordable rental housing production goals that the PJ hopes to achieve and describe how it will address the PJ'S priority needs:

The HOME-ARP activities fall in line with the City of Allentown's 5-year consolidated plan goals. Specifically, the consolidated plan addresses homelessness and the affordable housing crisis. Ap-65 Homeless and Other Special Needs Activities 91.220(i) states " In order to meet the City's Goals to participate in a regional effort to contribute to meeting the shelter and service needs of homeless residents of the City, to assist residents of the City in imminent danger of becoming homeless, and to assist residents in a continuum to find permanent housing, the City has budgeted \$193,373 from the FY2020 Emergency Solutions Grant funds for the support of the City's four (4) emergency shelters and a rapid re-housing program. Activities implemented by the City of Allentown, The CALV Sixth Street Shelter, The Allentown Rescue Mission, The

Salvation Army, and the Lehigh Conference of Churches. The city anticipates assisting approximately 100 persons through the shelter assistance. The city also addresses the needs of affordable housing. The consolidated plan AP-55 Affordable Housing 91.220(g) states "The City of Allentown expects to focus its CDBG and HOME entitlement funds towards improving the quality of life in city neighborhoods for extremely low, very low-, and low-income households, and to preserve and increase the stock of affordable owner and renter housing units".

All units funded with HOME-ARP will be filled through Coordinated Entry System or other approved referral methods to ensure they are serving those in upmost need.

XVII. Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

The City of Allentown does not intend to give preference to one or more qualifying populations or subpopulations for any funded eligible activity or project.

XVIII. If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet needs or gaps in benefits and services received by individuals and families in the qualifying populations or category of qualifying populations, consistent with the PJ's needs assessment and gap analysis.

N/A- The City of Allentown does not intend to give preference to one or more qualifying populations or subpopulations for any funded eligible activity or project.

XIX. If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits for services of the other qualifying populations that are not included in the preference.

N/A- The City of Allentown does not intend to give preference to one or more qualifying populations or subpopulations for any funded eligible activity or project.

XX. If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME- ARP refinancing guidelines in accordance with 24 CFR 92.206(b). The guidelines must describe the conditions under with the PJ will refinance existing debt for a HOME-ARP rental project.

The City of Allentown does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds.

