

APPENDICES



Baer, Heidi

From: Shackelford, Susan E [susan.e.shackelford@hud.gov]
Sent: Wednesday, June 02, 2010 2:45 PM
To: Baer, Heidi
Subject: 2010 CP/Action Plan Allentown - Additional Information Needed NLT 6-11-10
Importance: High

Heidi:

I finally got to review your CP/AP

1. I am having a difficult time locating the required elements for the Consolidated/Action Plan. In particular, 91.220 (g) (2) for the HOME program. Could not find where any of the required information was in the Action Plan

Attached in the checklist used for the CP/AP from the HUD website. I would appreciate you completing it with the pages where I can find the required information.

The Website for more guidance is:

<http://www.hud.gov/offices/cpd/about/conplan/toolsandguidance/guidance/index.cfm>

Please pay particular attention to the questions as it will indicate whether the information provided is sufficient. For instance:

2. Monitoring Narrative – Action Plan, page 20 – You have to expand your explanation. Monitoring entails not only determining if they are undertaking the activity, but a review of the records/information either in-house or on-site to determine eligibility of expenses (national objective compliance for CDBG).
3. Appendix A –Is there any reason you did not complete any goals for the five years?
4. Appendix B- What purpose does the 108 spreadsheet serve? Allentown is not listed and indicates amounts through 1/31/04.

I would appreciate it if you could have this back to me, no later than Friday 6/11. The sooner the better. Please be advised without the HOME references, I will not be able to approve that portion of the plan.

As always, thank you in advance,

Sue

Susan E. Shackelford

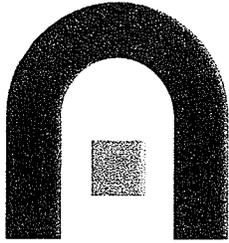
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6/3/2010

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6/3/2010



Allentown
City without limits.

HEIDI K. BAER
Grants Coordination Manager
Community and Economic Development
610.437.7761 Fax 610.439.5947
baer@allentowncity.org

June 10, 2010

Ms. Susan Shackelford
Community Planning and Development Representative
United States Department of Housing and Urban Development
Philadelphia Office
The Wanamaker Building
100 Penn Square East
Philadelphia, PA 19107

Dear Ms. Shackelford:

In response to your questions regarding the City of Allentown's Consolidated Plan for the period July 1, 2010 to June 30, 2015, including the One Year Action Plan for the period July 1, 2010 to June 30, 2010, I offer the following addition information.

1. I am having a difficult time locating the required elements for the Consolidated/Action Plan. In particular, 91.220 (g) (2) for the HOME program. I could not find where any of the required information was in the Action Plan.

Attached please find the Consolidated Plan Review Checklist which you referenced. It has been completed with the appropriate page numbers listed.

In addition, an updated HOME explanation is also attached.

2. Monitoring Narrative – Action Plan, page 20 – You have to expand your explanation. Monitoring entails not only determining if they are undertaking the activity, but a review of the records/information either in-house or on-site to determine eligibility of expenses (national objective compliance for CDBG).

Attached please find the updated Monitoring Section.

3. Appendix A – Is there any reason you did not complete any goals for the five years?

Attached please find an updated goals chart. As we discussed, this is the chart we have used for the past consolidated plan and every year, it will be updated to



June 10, 2010
Ms. Susan Shackelford
Community Planning and Development Representative
United States Department of Housing and Urban Development
Philadelphia, PA 19107
Page 2

reflect accomplishments along with the original goals, as we have done in the past. We have found this format to be much more user friendly.

4. Appendix B- What purpose does the 108 spreadsheet serve? Allentown is not listed and indicates amounts through 1/31/04.

Please disregard this chart, it was inadvertently included in the final submission of the plan.

In addition, I have included an income chart showing a breakdown of the three entitlement grants, anticipated program income and rollover for the 2010-2011 program year. Finally, I have also included a chart which shows the cap percentages.

Thank you for the opportunity to correct these deficiencies in our original submission. Please feel free to contact me if you have any questions or require additional information.

Sincerely,



Heidi K. Baer

Grants Coordination Manager

Enclosures

Consolidated Plan Review Guidance

This guidance is provided as a template for the reviews of complete plans. The submission of sections dealing with Needs Assessments, Housing Market Analysis, and Strategic Plans are not required on an annual basis. Each field office should include additional questions or clarifications that address the complexity of their local situation.

Grantee: Enter Grantee Name Here City of Allentown

1. If a Consortia, list participating communities and asterisk the lead agency:
 * Lead Agency Name
 Consortia Participant, Consortia Participant, Consortia Participant, Consortia Participant,
 Consortia Participant, Consortia Participant, Consortia Participant, Consortia Participant

2. Consolidated Plan covers the following programs:
 CDBG HOME ESG HOPWA Page 1

3. Period covered by Consolidated Plan is: 3 4 5 years. Cover Page
 Also, specify the period with month beginning and year ending

4. Date plan due: May 15,2010

5. Date plan received:

6. Automatic approval date (45 days of date received above):

7. Are maps included (optional)? Yes No Page 12, 13

8. Has an Executive Summary been attached (required)? Yes No Page 1

9. Did the grantee include the following tables:

Local Jurisdiction:

- | | |
|---|--|
| Table 1A: Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> Appendix A (after certifications) |
| Table 1B: Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> " |
| Table 1C: Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Table 2A: Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> Appendix A |
| Table 2B: Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Table 2C: Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Table 3A: Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Table 3B: Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Table 3C: Yes <input type="checkbox"/> | No <input type="checkbox"/> |

10. Did the grantee use the CPMP Tool? Yes No.

11. Did the grantee include one or more proposed outcomes in the Plan?
 Yes No Verification found on page Under respective Strategy Areas &
 Activity Pages in Appendix C.

12. Does the plan include a Neighborhood Revitalization Strategy Area or Target Area
 where activities are carried out in a concentrated manner?
 Yes No Verification found on page Our Target Area is called the Focus
 Area, described on page 13.

If yes, identify census tracts for each NRSA and forward to Headquarters.

Located primarily in census tracts 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14,01, 16,
17, 18, & 21

CONSULTATION PROCESS (91.100)

1. Has the grantee consulted with other public/private entities that provide assisted housing, health services, and social services in developing this plan?
 Yes No Verification found on page Citizen participation Plan & Appendix C

Use the following checklist as a guide to determine extent of consultation process:

Consultation			
24CFR	Requirement	Yes	No
91.100(a)(1)	Housing Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Social Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Fair Housing Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Health Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Homeless Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>
91.100(a)(2)*	Chronically Homeless	<input checked="" type="checkbox"/>	<input type="checkbox"/>
91.100(a)(3)**	Lead-based Paint	<input checked="" type="checkbox"/>	<input type="checkbox"/>
91.100(a)(4)***	Adjacent Government	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	State (Non-housing)	<input type="checkbox"/>	<input type="checkbox"/>
	County (Metro. City)	<input type="checkbox"/>	<input type="checkbox"/>
91.100(a)(5)	Metro. Planning Agencies	<input type="checkbox"/>	<input type="checkbox"/>
91.100(b)	HOPWA	<input type="checkbox"/>	<input type="checkbox"/>
91.100(c)	PHA Plan	<input type="checkbox"/>	<input type="checkbox"/>

- * Were assisted housing, health, and social service agencies consulted to determine resources available to address needs of chronically homeless persons.
 ** Were State/Local health and child welfare agencies consulted regarding lead paint issues.
 *** Was copy of the plan submitted to the State, and County if applicable; if an urban county, to the entitlement cities in the county.

1. Did the grantee indicate that it consulted with other organizations that provide housing and supportive services to special needs populations (including elderly persons, persons with disabilities, persons with HIV/AIDS, homeless persons)?
 Yes No Verification found on page Pages 17, 37, 38, & Appendix C
2. Did the grantee consult with Public Housing Agencies during Consolidated Plan development?
 Yes No N/A Verification found on page Beginning Page 52
3. Did the grantee consult with metropolitan or regional planning agencies during Consolidated Plan development?
 Yes No N/A Verification found on page City Planning Bureau worked on the Plan

CITIZEN PARTICIPATION (91.105, AND 91.200)

1. Is there a description of the development of the plan and efforts to broaden public participation, including the names of organizations involved in the development of

the plan?

Yes No Verification found on page Page 2, Page 18, & Appendix C

Note: The Jurisdiction shall encourage the participation of local and regional institutions and other organization (including businesses, developers, community, and faith-based organizations) in the process of developing and implementing the plan.

2. Is there a summary of the citizen participation process, and were the public hearing and comment period requirements satisfactory?

Yes No Verification found on page

Yes No Verification found on page Page 2, Page 18, & Appendix C

3. Are citizen comments included in the plan, and are the comments specifically and adequately addressed by the grantee?

Yes No Verification found on page Page 18 & Appendix C, No comments received which needed to be addressed

4. Is there a description of the lead agency or entity responsible for overseeing the development of the Consolidated Plan?

Yes No Verification found on page Page 14

HOUSING AND HOMELESS NEEDS ASSESSMENT (91.205)

HOUSING

1. Has the grantee identified the estimated number and types of families with housing needs for a **5 year** period?

Yes No Verification found on page Page 26, Appendix A

Note: See Table 2A (required)

Family types (extremely low-, low-, moderate, and middle income) that should be identified are:

- Renter/owner
- Elderly
- Single persons
- Large families
- Persons with disabilities
- Victims of domestic violence
- Persons with HIV/AIDs

2. Has the grantee identified the types of housing needs in the community for a 5 year period?

Yes No Verification found on page Page 26, 32

Types of housing needs should be determined with an analysis of:

- Severe cost and cost burden
- Overcrowding (especially for large families)
- Substandard (renter/owner, extremely low-, low-, moderate, and middle income)

2. Has the grantee included a discussion of any racial or ethnic groups that have a disproportionately greater need in comparison to the needs of a particular income category?

Yes No Verification found on page Page 38

Note: Disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial/ethnic group is at least 10% points higher than the percentage of persons in the category as a whole. **See Section 91.205 (b)(2)**

HOMELESS

1. Has the grantee satisfactorily identified the nature and extent of homelessness, and is there a continuum of care concept? **See Table 1A (required).**
Yes No Verification found on page Page 82 & Appendix 1A
 - Information should be on both homeless singles and families (and subpopulations) that are either sheltered/unsheltered or threatened with homelessness.
2. Has the grantee identified homeless facilities and services needs for homeless individuals and homeless families with children, both sheltered and unsheltered and homeless subpopulations?
Yes No Verification found on page Page 73
3. Has the grantee identified the extent of homelessness by racial/ethnic group, if the information is available?
Yes No Verification found on page Not Available
4. Did the grantee describe the jurisdiction's strategy for developing a system to address homelessness and the priority needs of homeless persons and families (including the subpopulations identified in the needs section)? The jurisdiction's strategy must consider the housing and supportive services needed in each stage of the process, i.e. preventing homelessness, outreach/assessment, emergency shelters and services, transitional housing, and helping homeless persons (especially any persons that are chronically homeless) make the transition to permanent housing and independent living.
Yes No Within homelessness section beginning on page 67
5. Did the grantee describe its strategy for helping extremely low- and low-income individuals and families who are at imminent risk of becoming homeless?
Yes No Page 71

SPECIAL NEEDS - NOT HOMELESS

1. Has the grantee included a discussion on the estimated number of non-homeless persons in need of supportive housing, and their supportive housing needs? **See Table 1B (optional).**
Yes No Verification found on page 100
Note: Estimated number of non-homeless persons should include the elderly, frail elderly, persons with disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDs and their families, and public housing residents.

LEAD-BASED PAINT HAZARDS

1. Has the grantee estimated the number of housing units with lead-based paint

hazards?

Yes No Verification found on page page 23

Note: The estimated number of units should be those that are occupied by low/moderate income families.

HOUSING AND MARKET ANALYSIS (91.210)

GENERAL CHARACTERISTICS

1. Has the grantee described the significant characteristics of the housing market, and the housing stock available to persons with disabilities, and persons with HIV/AIDs?
(Review any maps if provided/See Table 1A and 1B)

Yes No Verification found on page Pages 34 & 35

Note: There should be a discussion of housing supply and demand, as well as the condition and cost of the housing. Data on the housing market should include, to extent information is available, an estimate of the number of abandoned buildings and whether they are suitable for rehabilitation. The grantee should also identify and describe the locations and degree of racial/ethnic minority concentrations, as well as low/moderate income families.

2. Did the grantee identify and describe any area of low-income concentration and any area of minority concentration either in a narrative or one or more maps, stating how it defines the terms "area of low-income concentration" and "area of minority concentration"?

Yes No Verification found on pages 8-12

PUBLIC AND ASSISTED HOUSING

1. Has the grantee described the number and condition of the public housing units, results from the Section 504 needs assessments, and the strategies for improving operation and living conditions for public housing residents?

Yes No N/A Verification found on pages 52-55

2. Has the grantee identified the number of public housing units expected to be lost from the inventory?

Yes No N/A Verification found on page N/A

Check if this jurisdiction has any HOPE VI projects awarded or in development that may result in a net loss of units.

3. With regard to federal, state and locally-assisted units other than public housing, has the grantee identified the number and targeting of units by income level and household type, and the number of units expected to be lost from the assisted housing inventory for any reason, i.e. expiration of Section 8 contracts?

Yes No Verification found on pages 59-60

HOMELESS FACILITIES AND SERVICES

1. Have the facilities and services that compose the grantee's continuum of care been identified?

Yes No Verification found on pages 67-71

Appropriate facilities would be:

- Emergency shelters,

- Transitional shelters, and
 - Permanent/supportive housing (including persons that are chronically homeless).
2. Does the inventory include, to the extent information is available, an estimate of percentage or number of beds and supportive services programs serving people that are chronically homeless?
 Yes No Verification found on page 70

SPECIAL NEEDS FACILITIES AND SERVICES

1. Has the grantee described the facilities/services to assist non-homeless persons in need of supportive housing? **See Table 1B**
 Yes No Verification found on pages 71-72, 87-88, & 103-105
- Discussion should also include a description of appropriate supportive housing for persons leaving mental/physical health facilities.

BARRIERS TO AFFORDABLE HOUSING

1. Has the grantee described public policies that affect affordable housing?
 Yes No Verification found on page 65
 Factors which affect affordable housing may include:
- Building and zoning codes;
 - Environmental problems;
 - Impact fees;
 - Cost of land; and
 - Incentive programs such as tax abatement or down-payment assistance.
- Note:** For Urban Counties, does the discussion include factors in both incorporated and unincorporated areas?

STRATEGIC PLAN (91.215)

When reviewing this section of the Consolidated Plan, keep in mind that the priorities/objectives should relate to the needs identified in the Housing and Homeless Needs and Housing and Market Analysis sections.

GENERAL

1. Does the grantee describe the basis for assigning the priority given to each category in Table 2A?
 Yes No Verification found on page 22-23
2. Has the grantee identified any obstacles to meeting underserved needs?
 Yes No Verification found on page 23
3. Has the grantee summarized the priorities and specific objectives, describing how funds that are reasonably expected to be made available will be used to address identified needs? **See Tables 1A, 1B, 1C, 2A, 2B, and 2C**
 Yes No Pages 40, 50, 91-98, 100, & Appendix A
4. For each specific objective, has the grantee identified proposed accomplishments and outcomes the jurisdiction hopes to achieve in quantitative terms over a specific

time period, or in other measurable terms as identified and defined by the jurisdiction? **See Tables 1A, 1B, 1C, 2A, 2B and 2C**

Yes No Pages 40, 50, 91-98, 100, & Appendix A

AFFORDABLE HOUSING

1. Did the grantee state how the analysis of the housing market and the severity of housing problems and needs of extremely low-income, low-income, and moderate-income renters and owners identified in accordance with 91.205 provided the basis for assigning the relative priority given to each priority needs category in the priority housing needs table prescribed by HUD?

Yes No Verification found on page 23

2. Does the affordable housing section identify how the characteristics of the housing market will influence the use of funds made available for rental assistance, production of new units, rehabilitation of old units, or acquisition of existing units?

Yes No Verification found on page 49

Note: If the jurisdiction intends to use HOME funds for tenant-based rental assistance or plans to use HOME funds to assist persons with special needs, the plan must specify local market conditions that led to the choice of that option.

3. Does the grantee described proposed accomplishments to specify the number of extremely low, low, moderate, and middle income families to whom the grantee will provide affordable housing as defined in 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership over a specific time period?

Yes No Verification found on page 50-51

HOMELESSNESS

1. Does the grantee describe the strategy for helping low-income families avoid becoming homeless?

Yes No Verification found on page 73-74

2. Does the grantee describe the jurisdiction's strategy for reaching out to homeless persons and assessing their individual needs?

Yes No Verification found on page 74-76

3. Does the grantee describe the jurisdiction's strategy for addressing the emergency shelter and transitional housing needs of homeless persons?

Yes No Verification found on page CoC Strategies, page 83-86

4. Does the grantee describe the jurisdiction's strategy for helping homeless persons (especially persons that are chronically homeless) make the transition to permanent housing and independent living?

Yes No Verification found on page 84

OTHER SPECIAL NEEDS

1. With respect to supportive needs of the non-homeless, does the plan describe the priority housing and supportive service needs of persons who are not homeless but may or may not require supportive housing?

Yes No Verification found on page 103-105

NON-HOUSING COMMUNITY DEVELOPMENT PLAN

1. Did the grantee describe the priority non-housing community development needs, reflecting the needs for the type of activity? **Table 2B (required)**

Yes No Page 89

Note: The Community Development component of the plan must state the grantee's specific long-term and short-term community development objectives (including economic development activities that create jobs) that must be developed in accordance with the statutory goals described in 24 CFR 91.1 and the primary objectives of the CDBG program.

2. Is the grantee requesting approval of a Neighborhood Revitalization Strategy Area?

Yes No

If YES, does it meet the requirements of CPD Notice 96-1 and include outcomes?

Yes No

Note: Separate documentation should be maintained to verify compliance with CPD Notice 96-1.

BARRIERS TO AFFORDABLE HOUSING

1. Does the grantee describe the jurisdiction's strategy to remove or ameliorate negative effects of public policies, that serve as barriers to affordable housing as identified in the needs assessment section?

Yes No Verification found on page 65

LEAD-BASED PAINT HAZARDS

1. Does the plan outline the actions proposed or being taken to evaluate and reduce lead-based paint hazards, describe how the plan for reduction of lead-based paint hazards is related to the extent of lead poisoning and hazards, and how the plan for reduction will be integrated into housing policies and programs?

Yes No Verification found on page 23-26

ANTI-POVERTY STRATEGY

1. Does the grantee describe the jurisdiction's goals, programs, and policies for reducing the number of poverty level families?

Yes No Verification found on page 98

Has the grantee programs such as:

- Family Self-sufficiency
- Head Start
- State and Local Programs
- Section 3
- Welfare to Work
- Workforce Development Initiative

INSTITUTIONAL STRUCTURE

1. Does the grantee explain the institutional structure, including private industry, nonprofit organizations, community and faith-based organizations, and public institutions, through which the jurisdiction will carry out its housing, homeless, and

community development plan, assessing the strengths and gaps in the delivery system?

Yes No Verification found on pages 19-21

COORDINATION

1. Does the plan identify the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health, and service agencies?

Yes No Verification found on page 19

2. With respect to the public entities involved, does the plan describe the means of cooperation among the state and local units of government in the metropolitan area for problems that go beyond a single jurisdiction, (i.e. transportation, workforce, economic development) in the implementation of the plan?

Yes No Verification found on pages 19-20

3. With respect the homeless strategy, does the plan describe efforts to enhance coordination among agencies to address the needs of persons that are chronically homeless?

Yes No Verification found on pages 67-71

4. With respect to economic development, does the plan describe efforts to enhance coordination with private industry, businesses, developers, and social service agencies.

Yes No Verification found on page

PUBLIC HOUSING

1. Does the grantee describe the jurisdiction's activities to encourage public housing residents to become more involved in management and participate in homeownership?

Yes No Verification found on pages 62-64

2. Has the grantee describe the manner in which the plan of the jurisdiction will help address the needs of public housing?

Yes No Verification found on pages 62-64

Note: Amended to Title 1 October 21, 1998 Section 105(b)(11)

3. Is the grantee served by a troubled PHA as designated by HUD?

Yes No

If YES, Has the grantee in which any troubled public housing agency is located, described the manner in which the State or unit of local government will provide financial or other assistance to such troubled agency in improving its operations to remove such designation?

Yes No Verification found on page

Note: Amended to Title 1 October 21, 1998 Section 105(g)

ACTION PLAN (91.220)

1. Has the Standard 424 Form for the applicable programs been included with the

- correct dollar allocations and signed by the appropriate official?
 Yes No
2. Is the DUNS number listed?
 Yes No
3. Did the grantee describe the geographic areas of the jurisdiction (including areas of low income and/or racial/minority concentration) in which assistance will be directed during the next year.
 Yes No Action Plan pages 8-13
4. Did the grantee describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.
 Yes No Action Plan pages 13-14

RESOURCES

1. Has the grantee described the Federal Resources, and private and non-Federal public resources expected to be available to address priority needs and specific objectives identified in the plan?
 Yes No Verification found on page 15
2. Did the grantee describe how HOME and/or ESG matching requirements will be satisfied?
 Yes No N/A Verification found on page 27A

ACTIVITIES 91.220(D)

- 1.
- a) Has the grantee described the CDBG funded activities for the program year in a complete manner? **See Table 3C**
 Yes No Verification on pages 22-23, 34-41, & Appendix B
- b) Has the grantee described the HOME funded activities for the program year in a complete manner? **See Table 3C**
 Yes No Verification on pages 22-23, Appendix B
- c) Has the grantee described the ESG funded activities for the program year in a complete manner? **See Table 3C**
 Yes No Verification on page 29 & Appendix B
- d) Has the grantee described the HOPWA funded activities for the program year in a complete manner? **See Table 3C**
 Yes No N/A
2. Does the action plan contain a summary of priorities and specific annual objectives that will be addressed during the program year?
 Yes No Verification found on pages 22-23, 34-41, & Appendix B
Note: The Jurisdiction should use summary of annual objectives as identified in Table 3A of the Consolidated Plan.
3. Do the proposed activities correspond to the priority needs identified/local specific objectives listed in the Consolidated Plan?
 Yes No Verification found on pages 3-4
Note: The Jurisdiction should use priority needs as identified in Table 2A and 2B of the Consolidated Plan.

4. Are the proposed activities identified in sufficient detail, including the number and type of families that will benefit from the proposed activities and locations, so that citizens know the degree to which they may be affected?
Yes No Verification found on activity pages found in Appendix B

Outcomes 91.220(e)

5. Does the action plan contain outcome measures for activities in accordance with the Federal Register Notice dated March 7, 2006?
Yes No Verification found on activity pages found in Appendix B

Expenditure Limits

1. Has the grantee exceeded the 20% administrative cap for CDBG?
Yes No
2. Has the grantee exceeded the 15% public service cap for CDBG?
Yes No
3. Has the grantee exceeded the 10% administrative cap for HOME?
Yes No
4. Has the grantee met the 15% CHDO set-aside for HOME?
Yes No
5. Has the grantee exceeded the 3% administrative cap for HOPWA or the 7% administrative cap by project sponsors under HOPWA?
Yes No N/A

GEOGRAPHIC DISTRIBUTION 91.220(f)

1. Did the grantee include a narrative, maps, or tables that identify the geographic areas in which it will direct assistance?
Yes No Verification found on page 8, maps on pages 13-14
2. Does the grantee provide a description of the areas, including areas of minority concentration, in which it will direct funds?
Yes No Verification found on pages 8-11
3. Does the grantee provide the rationale for the priorities for allocating investment geographically for each program, including within the metropolitan area (or a State's service area) for the HOPWA program?
Yes No Verification found on page 13-14
If no, explain the basis for the no response:
4. Did the grantee estimate the percentage of funds it plans to dedicate to target areas?
Yes No Verification found on page 14

AFFORDABLE HOUSING GOALS 91.220(g)

1. Does the action plan specify one-year goals for the number of homeless, non-homeless, and special needs households to be provided affordable housing units

using funds made available to the jurisdiction?

Yes No Verification found on page Appendix A

Note: The Jurisdiction should use housing summary of goals as identified in Table 3B of the Consolidated Plan.

2. Does the action plan specify one-year goals for the number of households to be provided affordable housing units through activities that provide rental assistance, production of new units, rehabilitation of existing units, or acquisition of exiting units using funds made available to the jurisdiction?

Yes No Verification found on page

Note: The Jurisdiction should use housing summary of goals as identified in Table 3B of the Consolidated Plan.

PUBLIC HOUSING 91.220(h)

1. Does the action plan include actions that address the following, **if applicable**:

- needs of public housing, Yes No Pages 24-25
- public housing improvements and resident initiatives, Yes No Pages 25-26
- assist troubled public housing agencies Yes No N/A

HOMELESS AND OTHER SPECIAL NEEDS ACTIVITIES 91.220(i)

1. Have homeless prevention activities been proposed?

Yes No Verification found on pages 31-32 & Appendix B

2. Have emergency shelter, transitional housing, programs to assist in the transition to permanent housing and independent living been proposed?

Yes No Verification found on page

3. Are supportive housing activities being undertaken to address the priority housing needs of persons who are not homeless (elderly, frail elderly, persons with disabilities, person with HIV/AIDS, persons with alcohol or other substance abuse problems)?

Yes No Verification found on page Appendix B

4. Have specific action steps to end chronic homelessness been identified?

Yes No Verification found on pages 30-31 & Appendix B

OTHER ACTIONS 91.220(k)

1. Does the Action Plan include other proposed actions which will address the following, **if applicable**:

- foster and maintain affordable housing, Yes No
- public housing improvements and resident initiatives, Yes No N/A
- evaluation and reduction of lead-based hazards, Yes No
- reducing the number of persons below the poverty line, Yes No
- developing institutional structures/enhancing coordination between housing and services agencies, Yes No .

PROGRAM SPECIFIC REQUIREMENTS 91.220(I)

1. CDBG

- a) Does the total amount of funds allocated equal the amount of the grant plus program income and carryover funds? Yes No Pages 4-7
- b) Does the action plan identify the amount of CDBG funds that will be used for activities that benefit persons of low- and moderate-income? Yes No Verification on pages 4-5
- c) Does the action plan identify all activities assisted through the Section 108 Loan Guarantee program? Yes No N/A

1. HOME

- a) Did grantee (PJ) describe other forms of investment? **See Section 92.205**
Yes No N/A
If grantee (PJ) plans to use HOME funds for homebuyers, did they state the guidelines of resale or recapture, as required in 92.254?
Yes No N/A Verification on page 27A
- b) If grantee (PJ) plans to use HOME funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds, did they state its refinancing guidelines required under 24 CFR 92.206(b)?
Yes No N/A
- c) Resale Provisions -- For homeownership activities, did the participating jurisdiction must describe its resale or recapture guidelines that ensure the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4).
Yes No Verification on page 27A
- d) HOME Tenant-Based Rental Assistance -- Did the participating jurisdiction describe the local market conditions that led to the use of HOME funds for tenant based rental assistance program?
Yes No
 - a. If the tenant based rental assistance program is targeted to or provides a preference for a special needs group, that group must be identified in the Consolidated Plan as having an unmet need and show the preference is needed to narrow the gap in benefits and services received by this population.
- e) If a participating jurisdiction intends to use forms of investment other than those described in 24 CFR 92.205(b), did the jurisdiction describe these forms of investment?
Yes No N/A
- f) Did the jurisdiction describe the policy and procedures it will follow to affirmatively market housing containing five or more HOME-assisted units?
Yes No Verification on page 27A
- g) Did the jurisdiction describe actions taken to establish and oversee a minority outreach program within its jurisdiction to ensure inclusion, to the maximum extent possible, of minority and women, and entities owned by minorities and women, including without limitation, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking firms, underwriters, accountants, and providers of legal services, in all contracts, entered into by the participating jurisdiction with such persons or entities, public and private, in order to facilitate the activities of

the participating jurisdiction to provide affordable housing under the HOME program or any other Federal housing law applicable to such jurisdiction?

Yes No Verification on page 27A

h) If a jurisdiction intends to use HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds, did it state its financing guidelines required under 24 CFR 92.206(b)?

Yes No N/A

1. American Dream Downpayment Initiative

a. If the jurisdiction planned to use American Dream Downpayment Initiative (ADDI) funds to increase access to homeownership, did it provide the following information:

i. description of the planned use of the ADDI funds?

Yes No N/A

ii. plan for conducting targeted outreach to residents and tenants of public and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide downpayment assistance for such residents, tenants, and families? Yes No N/A

iii. a description of the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers?

Yes No N/A

4. HOPWA

a) Does the action plan specify on-year goals for the number of low-income households to be provided affordable housing using HOPWA funds for short-term rent, mortgage, and utility payments to prevent homelessness; tenant-based rental assistance, units provided in housing facilities operated with HOPWA funds? Yes No N/A

b) Does the action plan identify the method for selecting project sponsors (including providing full access to grassroots faith-based and other community organizations)?

Yes No N/A

MONITORING (91.230)

1. Does the grantee describe the standards and procedures that it will use to monitor activities carried out in furtherance of the plan?

Yes No Verification found on page 20A of the Annual Plan & 22A of the Strategic Plan

2. Does the Plan describe actions to be taken by the grantee to monitor its performance in meeting its goals and objectives set forth in its Consolidated Plan?

Yes No Verification found on page 20A of the Annual Plan & 22A of the Strategic Plan

3. Does the Plan describe steps/actions being taken to insure compliance with program requirements, including requirements involving the timeliness of expenditures?

Yes No Verification found on page 20A of the Annual Plan & 22A of the

Strategic Plan

Note: If timeliness of expenditures is an issue, please make sure the grant award letter includes language regarding appropriate actions the grantee should take to remedy this problem.

4. Does the Plan describe steps/actions it will use to ensure long-term compliance with housing codes, including any actions or on-site inspections it plans to undertake during the program year?

Yes No Verification found on page 20A of the Annual Plan & 22A of the Strategic Plan

Note: For example, a HOME program grantee should identify steps it will take to review affordable housing projects it has funded to insure compliance with all HOME program requirements.

5. Does the Plan describe actions to be taken by the grantee to monitor its subrecipients, (including sponsors or administering agents)?

Yes No Verification found on page 20A of the Annual Plan & 22A of the Strategic Plan

HUD APPROVAL ACTION

The regulations at Section 91.500(b) state that HUD will approve or disapprove a plan or a portion of a plan for the three following reasons:

- 1) if it is inconsistent with the purposes of NAHA;
- 2) if it is substantially incomplete; and/or
- 3) if certifications are not satisfactory to the Secretary
- 4) if does not include description of manner in which unit of local government or state will provide financial or other assistance to troubled public housing agencies.

Please use the following to determine approval or disapproval:

CONSISTENCY WITH NAHA

1. Is the Plan inconsistent with the purposes of NAHA?

Yes No

If the Plan is inconsistent with NAHA, set forth the basis of that determination by using the following as a guide:

- Does the Plan provide assistance to help families, not owning a home, to save for a down-payment for the purchase of a home.
- Does the Plan provide assistance to retain, where feasible, as housing affordable to low income families, those dwelling units provided for such purpose with federal assistance.
- Does the Plan provide assistance to extend and strengthen partnerships among all levels of government and the private sector, including for-profit and non-profit organizations, in the production and operation of housing affordable to low- and moderate-income families.

- Does the Plan provide assistance to expand and improve federal rental assistance for very low-income families.
- Does the Plan provide assistance to increase the supply of supportive housing, which combines structural features and services needed to enable persons with special needs to live with dignity and independence.

SUBSTANTIALLY INCOMPLETE

1. Is the Plan (including any corrective actions taken at HUD’s request during HUD’s review of the plan) substantially incomplete?

Yes No

If the Plan is substantially incomplete, set forth the basis of that determination by using the following as a guide:

- The Plan was developed without the required citizen participation or the required consultation.
- The Plan fails to satisfy all the required elements in the regulations.

AFFIRMATIVELY FURTHERING FAIR HOUSING

1. Is the Certification to Affirmatively Further Fair Housing satisfactory to the Secretary?

Yes No

If the Certification is not satisfactory, set forth the basis of that determination by using the following as a guide:

- Disregard of regulatory requirements to conduct an analysis of impediments to fair housing choice, take appropriate actions to address identified impediments, and maintain adequate records on the steps taken to affirmatively further fair housing in the jurisdiction.
- Lack of action taken on outstanding findings regarding performance under affirmatively furthering fair housing certification requirements of the Consolidated Plan or the Community Development Block Grant Program.

CERTIFICATIONS (91.225)

1. Are the general and specific certifications for each program funded complete and accurate, where applicable:

Note: Consortia, please refer to 91.425
State, please refer to 91.325

General:

- | | | |
|--|------------------------------|-----------------------------|
| (1) Affirmatively furthering fair housing: | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Anti-displacement and relocation Plan: | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Drug-free workplace: | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (4) Anti-lobbying | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (5) Authority of Jurisdiction | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (6) Consistency with Plan | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (7) Acquisition and relocation | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

- | | | |
|---|------------------------------|-----------------------------|
| (8) Section 3 | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| <u>CDBG:**</u> | | |
| (1) Citizen Participation | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Community Development Plan | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Following Plan | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (4) Use of funds | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (5) Excessive Force | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (6) Compliance with anti-discrimination law | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (7) Compliance with lead-based paint procedures | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (8) Compliance with laws | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| <u>ESG:</u> | | |
| (1) Not less than 10-years | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Not less than 3-years | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Service Provision | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (4) Safe and Sanitary | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (5) Supportive Services | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (6) Match Requirements | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (7) Confidentiality | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (8) Employing or involving the homeless | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (9) Consolidated Plan compliance | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (10) Discharge policy | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| <u>HOME</u> | | |
| (1) TBRA is consistent w/Plan | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Use for eligible activities | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Monitor for subsidy layering | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| <u>HOPWA:</u> | | |
| (1) Meet urgent needs | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) 10- or 3-year operation | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

***The certification period for the CDBG program's overall benefit requirements must be consistent with the period certified in the prior certification.*

Based on my review of the Plan against the regulations, I have determined the Plan is:

Approved

Disapproved

Date plan disapproved (in part or in its entirety):

Note: Written notification of disapproval must be communicated to the applicant in accordance with 24 CFR 91.500(c). **If disapproved**, provide documentation including dates and times on incompleteness determination, and discussions with grantee and Headquarters:

Reviewed by

DATE:

Program Manager

DATE:

CPD Director

DATE:

HOME/ American Dream Down payment Initiative (ADDI)

1. Describe other forms of investment not described in § 92.205(b).
2. If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.
3. If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:
 - a. Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
 - b. Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.
 - c. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
 - d. Specify the required period of affordability, whether it is the minimum 15 years or longer.
 - e. Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.
 - f. State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.
4. If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:
 - a. Describe the planned use of the ADDI funds.
 - b. Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.
 - c. Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.

Error! Reference source not found.Action Plan HOME/ADDI response:

1. Other Forms of Investment

The City of Allentown does not anticipate receiving other forms of investment.

2. Recapture/Resale Provisions

HOME-assisted units carry occupancy restrictions for varying lengths of time, known as the affordability period. The HOME Program requires a minimum affordability period for all

projects receiving HOME funds, depending on the amount of HOME funds invested in each unit and the type of activities performed using HOME funds. The HOME-assisted housing must meet the affordability requirements for not less than the applicable period specified in the following table, beginning after project completion:

Homeownership assistance HOME amount per-unit	Minimum period of affordability (years)
Under \$15,000	5
\$15,000 to \$40,000	10
Over \$40,000	15

To ensure affordability, the City of Allentown must impose either resale or recapture requirements at its option. The City's Down Payment and Closing Cost assistance program (Community Partnership Program) will use a recapture provision; Community Housing Development Organization's (CHDO) and nonprofit housing developers providing Acquisition/Rehabilitation/Resale and New Construction activities will use resale provisions.

The City of Allentown's resale requirement will be enforced through a second mortgage/note that is executed between the City and the homebuyer. During the affordability period, the homeowner may sell only to another income eligible homebuyer (income not to exceed 80% of AMI) and only for a price that is affordable to the next homebuyer. The limited resale price is defined in the mortgage/note.

Limited Resale Price

The maximum allowable resale price of the unit, which is also referred to as the Limited Resale Price, shall be the **lower** of #1 or #2 below:

1. The Limited Appreciation Price, which is defined as:
 - a. The Homeowner's Purchase Price;
 - b. Plus a 50% increase in market value of the unit also referred to as the Appreciation Factor;
 - c. Plus any applicable Credit for Qualified Capital Improvements, as defined herein;
 - d. Less any amount charged for Excessive Damage, as determined herein

OR

2. The Current Market Value of the unit. In the event that the market value of the unit at the time of Homeowner's Intent to Sell Notice, determined as provided above, is less than the Homeowner's Purchase Price or the Limited Appreciation Price; the Limited Resale Price shall be the appraised value of the unit at the time of the Homeowner's Intent to Sell Notice.

3. HOME Funds

In its Consolidated Plan for the period July 1, 2010 through June 30, 2015, the City of Allentown established six categories: housing, economic development and job creation, community recreational/educational programming and facilities, infrastructure, liveability, and public safety. It was determined that all of these needs – because they are interrelated and impact one another – are all equally important in terms of priority. In the City's

Consolidated Plan, assistance to existing homeowners was rated as a top housing priority, regardless of the homeowner's income.

Private Sector Participation

The City of Allentown's Community Housing Development Organization's (CHDO's) – Alliance for Building Communities and Housing Association and Development Corporation – will use private sector funds to assist in the acquisition and rehabilitation of properties which will be sold to low income first-time homebuyers.

Affirmative Marketing

The City of Allentown, the Redevelopment Authority of the City of Allentown (RACA), Neighborhood Housing Services of the Lehigh Valley (NHSLV), Housing Association and Development Corporation (HADC), and Alliance for Building Communities (ABC) all work together to promote housing programs and affirmatively further fair housing to assure compliance with 24 CFR 92.351. The purpose of the City of Allentown's Affirmative Marketing Policy is to communicate to the general public that the City of Allentown's housing programs are administered in a non-discriminatory manner. The City's policy states that all HOME subrecipients and CHDOs must include the equal housing opportunity logotype or slogan in all outreach to the general community; they must display HUD's Fair Housing Poster wherever sales/rental and showings take place; they must identify populations that are least likely to apply for assistance without special outreach, and tailor affirmative marketing accordingly; they must complete HUD Form 935.2A and/or 935.2B, Affirmative Fair Housing Marketing Plan; they are encouraged to publish all advertisements, brochures, and other written material in other languages in order to reach non-English speaking clients; and, to use specific mailing lists or organizations whose membership or clientele consists primarily of protected class members.

In addition to the above stated policy, the City of Allentown staff walked door to door in the low to moderate income, minority neighborhoods to assist residents with the City's housing rehabilitation loan programs. Several staff members are bilingual, bicultural (Hispanic), and one is bilingual/bicultural in Vietnamese. Guidelines for programs are printed in English and Spanish. NHSLV, HADC, and ABC have outreach staff who are bilingual and bicultural (Hispanic) who provide extensive outreach to promote and assist their housing programs.

4. ADDI Funds

NOT APPLICABLE.

Monitoring (91.230)

1. Describe the standards and procedures the jurisdiction will use to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

Most of the activities described previously will be implemented by the City's Bureau of Building Standards and Safety and nonprofit organizations. Each year, the Bureau of Building Standards and Safety prepares an annual plan, based on the City's Consolidated Plan, detailing its anticipated activities during the upcoming program year. Once the plan is approved by the Mayor and City Council, staff are assigned their priorities for the new program year.

Once the new program year has started, supervisors within the Bureau of Building Standards and Safety meet with the staff on a regular basis to monitor their progress towards meeting the objectives outlined in the plan, and to ensure compliance with Federal statutory and regulatory requirements. All expenditures are reviewed by supervisors within the Bureau of Building Standards and Safety and the Department of Community and Economic Development. The financial status of the various programs is reviewed on a bi-weekly basis by accounting, administrative, and programmatic staff.

Each year, nonprofit organizations submit applications for funding through City-administered Federal grant programs. The applications are reviewed for eligibility and appropriateness, and the organizations are evaluated for their ability to properly administer the proposed program. Once funding decisions are made, the proposals are used to prepare the contracts with the agencies. Each contract includes a description of the activities to be funded, a schedule for completing the work, the anticipated accomplishments (written as Outcome-Based Objectives) and a budget. The contract also details the applicable Federal regulatory requirements.

Each nonprofit organization must submit monthly progress reports, which enable the City to compare the actual accomplishments to the objectives stated in the contract. Similarly, invoices are compared to the budget contained in the contract. Concerns raised by the progress reports or the invoices are shared with the nonprofit organization. The financial status of the various activities is reviewed by accounting and administrative staff on a bi-weekly basis.

The City conducts on-site monitoring of each subrecipient at least once a year. Additional monitoring may be necessary in some cases. At the end of the program year, the nonprofit organization must submit a cumulative report describing the accomplishments for the entire year. In addition, each agency must submit an annual audit, either a Single Audit or an audit conducted in accordance with generally accepted auditing standards.

ACTION PLAN SUMMARY
FOR
JULY 1, 2010 - JUNE 30, 2011

Obj #	Specific Objectives	Performance Measure	Anticipated Units
	Rental Housing Objectives		
H	See Below	See Below	See Below
	Owner Housing Objectives		
1	Housing	To maintain and improve the condition of the housing stock to meet or exceed current code standards, to reduce overcrowding in housing units as defined in the City's Property Maintenance Code	300 Units Inspected/Year 35 Rehab Loans/Year 10 Hazard Loans/Year 10 Façade Grants/Year
		Acquisition and Rehabilitation by CHDO's	4 Units/Year
2	Housing	To make available affordable homeownership within the existing housing stock	Acquisition of 5 Properties/Year for Rehabilitation for Owner-Occupied Housing Assist 20 Households/Year with Down Payment and Closing Costs
		To Develop new programs that encourage homeownership	Homesteading Program 2 Homes/Year

ACTION PLAN SUMMARY
FOR
JULY 1, 2010 - JUNE 30, 2011

Obj #	Specific Objectives	Performance Measure	Anticipated Units
3	Housing	To increase the knowledge and skills necessary for residents to own and maintain their own home	Support home management classes for 10 households/year Support homeownership classes for 30 persons/year Support individual counseling for 40 persons/year
4	Housing	Support the provision of decent, safe and affordable rental housing within the City and on a regional basis	10 Rental Units Rehabbed/Year Support Classes to Educate renters and Landlords 150 Persons/Year

ACTION PLAN SUMMARY
FOR
JULY 1, 2010 - JUNE 30, 2011

Obj #	Specific Objectives	Performance Measure	Anticipated Units
5	Housing	To participate in a regional effort to make available a full array of permanent housing opportunities for special needs populations, to contribute to meeting the shelter and service needs of homeless residents of the City, to assist residents in imminent danger of becoming homeless, and to assist residents in a continuum to find permanent housing	40 Families- Sixth Street Shelter 150 Women/Children- Salvation Army 605 Men- Allentown Rescue Mission 4 Women and their Children- Turning Point of the Lehigh Valley 8 Women and their Children- Program for Women and Families 75 People- Daybreak 340 People- Pathways 52 People- Lehigh Valley Center for Independent Living
1	Economic Development & Job Creation*	Increase the employment opportunities in the City, with special attention to strengthening the commercial/industrial base in the Focus Area and making it accessible to residents in the Focus Area	Economic Development Planning-Allentown Economic Development Corporation
2	Economic Development & Job Creation*	To assist in the revitalization of the central business district	Encourage and Support Retail Stores and Restaurants- Allentown Economic Development Corporation

ACTION PLAN SUMMARY
FOR
JULY 1, 2010 - JUNE 30, 2011

Obj #	Specific Objectives	Performance Measure	Anticipated Units
3	Economic Development & Job Creation*	To facilitate the adaptation and re-use of existing vacant and underutilized land and buildings in the focus area	Economic Development Planning-Allentown Economic Development Corporation
4	Economic Development & Job Creation*	To increase the educational preparedness and level of skills necessary for entrance employment opportunities for residents of the focus area	50 people- The Literacy Center (formerly Adult Literacy Center of the Lehigh Valley) 10 Resident's Career Preparation Program- Lehigh Carbon Community College 60 Homeless Men to Learn Job Skills Program- Allentown Rescue Mission
5	Economic Development & Job Creation*	To strengthen the focus area retail/service area	Offer Commercial Facades 5/Year
6	Economic Development & Job Creation*	To facilitate focus area residents' ability to access jobs by removing impediments	175 People- Syrian Arab American Charity 60 People- Family Answers
7	Economic Development & Job Creation*	To enhance transportation and utility infrastructure to better serve existing business and attract new types of businesses and industries	Encourage Cooperation between the City and Lanta as well as Utility Companies
1	Community Recreational/Educational Programming & Facilities	To enhance utilization of existing public/quasi-public facilities for neighborhood activities	The Planning Bureau and other City Bureaus Communicate with and Cooperate with Neighborhood Groups

ACTION PLAN SUMMARY
FOR
JULY 1, 2010 - JUNE 30, 2011

Obj #	Specific Objectives	Performance Measure	Anticipated Units
2	Community Recreational/Educational Programming & Facilities	To properly maintain and improve the condition of publicly-owned facilities	City Bureaus Cooperate with Neighborhood Groups in Seeking Funds
3	Community Recreational/Educational Programming & Facilities	To increase the number of and access to recreational/educational program opportunities within the Focus Area	75 Youth Educational and Recreational Programs- YMCA/YWCA 50 Students School to Career Transition Program- Communities In Schools 50 Youth Earn A Bike Program- Community Bike Works 147 Youth Recreational Programs- Alliance Hall 50 Youth-Make Your M.A.R.K. Boys/Girls Club 8 Children- Scholarship Program at Grace Montessori School
3	Community Recreational/Educational Programming & Facilities Continued...		20 Youth Program and Neighborhood Clean-Ups- St. Luke's Neighborhood Center 50 Summer Educational and Recreational Program-Mosser Village

ACTION PLAN SUMMARY
FOR
JULY 1, 2010 - JUNE 30, 2011

Obj #	Specific Objectives	Performance Measure	Anticipated Units
1	Infrastructure	To pursue infrastructure improvements that will promote commercial/industrial development within the Focus Area	Collaborate with other City Departments and Bureaus.
2	Infrastructure	To pursue infrastructure improvements in residential neighborhoods that encourage multi-modal transportation options and offer residents the ability to choose	Collaborate with other City Departments and Bureaus.
3	Infrastructure	To ensure that industrial properties slated for redevelopment/rehabilitation into other uses have the necessary utilities to support these potential uses	Collaborate with other City Departments and Bureaus.
1	Livability	To increase the cleanliness and peacefulness as well as reduce crime in the City's neighborhoods	City SWEEP Program to provide pro-active, field level education & enforcement of Allentown's litter and trash ordinances
2	Livability	To increase the percentage of homeownership in the focus and rehabilitation areas	Provide Down Payment and Closing Cost Assistance to 20 Households per Year
3	Livability	To decrease housing density in the focus area	Support Other Funded Deconversion Programs Acquire and Demolish 5 Sub-Standard Properties
4	Livability	To Support existing neighborhood groups and promote the development of new community organizations throughout the City	Support Neighborhood Planning Efforts
5	Livability	To increase the supply of parking in the focus and rehab areas	Support the Allentown Parking Authority's Efforts
6	Livability	To Promote the architectural and cultural resources that exist in many City neighborhoods	OAPA will Complete 5 Facades/Year

ACTION PLAN SUMMARY
FOR
JULY 1, 2010 - JUNE 30, 2011

Obj #	Specific Objectives	Performance Measure	Anticipated Units
7	Livability	To Enhance the appearance of Allentown's neighborhoods through proper design of public spaces	Encourage Cooperation Between the Planning Bureau and Neighborhoods
1	Public Safety	To create safe and secure residential neighborhoods and commercial districts	Encourage Cooperation Between Neighborhoods and the Police Department
2	Public Safety	Enforce existing safety codes for areas in public rights-of-way and in residential neighborhoods	Encourage Cooperation Between Neighborhoods and the Police Department

*Economic Development & Job Creation Activities and Goals are not all funded with CDBG funds, however the goals are all part of a comprehensive plan to assist in the revitalization of the City of Allentown

36th Year Income		
July 1, 2010 to June 30, 2011		
CDBG		
Entitlement		\$ 3,000,143.00
Program Income		\$ 111,265.00
Rollover		\$ 320,072.00
35th Year Unprogrammed		\$ 47,049.00
		\$ 3,478,529.00
HOME		
Entitlement		\$ 1,062,121.00
Program Income		\$ 105,317.00
35th Year Unprogrammed		\$ 108,928.00
		\$ 1,276,366.00
ESG		
Entitlement		\$ 121,258.00
Total	CDBG	\$ 3,478,529.00
	HOME	\$ 1,276,366.00
	ESG	\$ 121,258.00
		\$ 4,876,153.00

CITY OF ALLENTOWN
 36th YEAR
 JULY 1, 2010 TO JUNE 30, 2011
 ACTION PLAN

SUMMARY OF CAPS

COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM	\$3,000,143
ANTICIPATED CDBG PROGRAM INCOME	111,265
35 th Year unprogrammed (entitlement changed after 35 th year Action Plan approved)	47,049
HOME INVESTMENT PARTNERSHIPS PROGRAM	1,062,121
ANTICIPATED HOME PROGRAM INCOME	105,317
35 th Year unprogrammed (entitlement changed after 35 th year Action Plan approved)	108,928
EMERGENCY SHELTER GRANT PROGRAM	121,258

CAP DESIGNATION	AMOUNT BUDGETED	PERCENTAGE
CDBG PLANNING AND ADMINISTRATION	\$537,167	17
CDBG PUBLIC SERVICES	\$328,804	10
HOME ADMIN	106,744	10
HOME CHDO SET ASIDE	\$159,000	15
HOME CHDO ADMINISTRATION	\$53,371	5
ESG ESSENTIAL SERVICES	N/A	N/A
ESG STAFF	N/A	N/A
ESG HOMELESS PREVENTION	\$29,000	24
ESG ADMINISTRATION	\$5,235	4



U.S. Department of Housing and Urban Development

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

May 19, 2010

Ms. Heidi K. Baer
Grants Coordination Manager
Department of Community
and Economic Development
435 Hamilton Street
Allentown, PA 18101-1699

Dear Ms. Baer:

SUBJECT: Receipt of Five Year Consolidated Plan Program Years 2010-2014
And Annual Action Plan Year 2010
City of Allentown, Pennsylvania

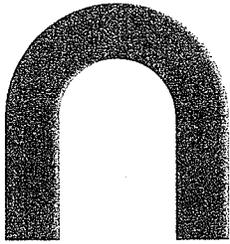
This is to acknowledge receipt of the City's Consolidated Plan for the period of January 1, 2010 through December 31, 2014 and Action Plan for Program Year 2010. Your submission, which covers the City's Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Shelter Grants (ESG) Programs, was received in this Office, in a timely fashion, on May 14, 2010. The Action Plan covers the City's July 1, 2010 through June 30, 2011 program year.

We have reviewed your submission for completeness in accordance with 24 CFR Part 91 of the Consolidated Plan Regulations. While we are accepting the City's submission for review, additional information may be required in order to complete our substantive review. We will notify your Office accordingly.

If you have any questions, or if you need any further assistance, please contact me at (215) 861-7667. This Office may be reached via text telephone (TTY), by dialing (215) 656-3452.

Sincerely,

Susan E. Shackelford
Susan E. Shackelford
Senior Community Planning and Development
Representative
Office of Community Planning
and Development



Allentown
City without limits.

Ed Pawlowski, Mayor
610.437.7546
fax 610.437.8730
pawlowski@allentowncity.org

May 10, 2010

Mr. Nadab Bynum
Director
Office of Community Planning and Development
United States Department of Housing and Urban Development
Philadelphia Office
The Wanamaker Building
100 Penn Square East
Philadelphia, PA 19107-3380

Dear Mr. Bynum:

The City of Allentown is declining the FFY 2010 Formula Housing Opportunities for Persons with AIDS (HOPWA) Program funding. The funds would have been for the Allentown-Bethlehem-Easton, PA-NJ Eligible Metropolitan Statistical Area (EMSA). This decision is based on the administrative burden associated with implementing a program throughout three counties within the Commonwealth of Pennsylvania and one county in the State of New Jersey.

As allowed in the funding letter from the Deputy Assistant Secretary for Special Needs dated October, 7, 2009, the City of Allentown desires to have the Commonwealth of Pennsylvania continue to administer this HOPWA funding in Carbon, Lehigh and Northampton counties in Pennsylvania as it has done since the inception of the HOPWA Program. It is our understanding that the HUD Newark Field Office will coordinate the re-assignment of Warren County New Jersey to a grantee within the State of New Jersey.

If you have any questions or require additional information, please feel free to contact Heidi K. Baer, Grants Coordination Manager, at 610-437-7761 or via e-mail at baer@allentowncity.org.

Sincerely,

ED PAWLOWSKI
Mayor



