



# Fourth Program Year Action Plan

The CPMP Fourth Annual Action Plan includes the [SF 424](#) and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

## Narrative Responses

### GENERAL

#### Executive Summary

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

Program Year 4 Action Plan Executive Summary:

In accordance with **Section 91.220(b)**, the following initiatives and goals for the 4<sup>th</sup> Action Year are consistent with those established in the Five-Year Consolidated Plan that became effective on July 1, 2005, and are compatible with the purposes set forth in **Section 91.1**, and they are:

1. Affordable Housing Programs consisting of housing rehabilitation and new construction that focus on homeownership, programs to assist lower-income persons to attain homeownership, as well as single and multi-family rental rehabilitation and new construction program activities
2. Economic Development activities targeting the Enterprise Community, Empowerment Zone, and Neighborhood Revitalization Strategy Area.
3. Neighborhood improvement projects in the Enterprise Community, Empowerment Zone, and Neighborhood Revitalization Strategy Area.
4. Assistance to the homeless and special needs populations through the Emergency Shelter Grant Program, Housing Opportunities for Persons with HIV/AIDS and Continuum of Care Program.

The goals and objectives that are addressed in this 4<sup>th</sup> Action Year Plan specifically relate to the goals outlined in the Five Year Consolidated Plan and the Department of Housing and Urban Development goals that include:

1. The provision of decent housing
2. The provision of a suitable living environment, and
3. Expanding economic opportunities principally for persons of low and moderate income

The project activities are outlined as they relate to availability/accessibility, affordability, and sustainability with regard to decent housing, suitable living environment and economic opportunity program activities. Implementation of program activities to address the stated objectives are measured in terms of the following:

- Units of housing assisted
- Jobs created
- Public improvements completed in Target Areas
- Homeless and Special Needs Persons assisted through public and private programs
- Pledging and applying CDBG program income from housing loans toward the retirement of Section 108 debt on the American Indian Cultural Center and Museum, Tower Tech and the Dell Business Service Center

Oklahoma City’s entitlement grant funding allocations, recommended for adoption in this 4<sup>th</sup> Action Year Plan (fiscal year July 1, 2008 through June 30, 2009), follow the priorities established in the current five-year Consolidated Plan that expires June 30, 2010. The following Action Year Strategy will contain specific funding recommendations to implement the goals established in the five-year Plan tables to the extent possible depending on federal funding allocations awarded to Oklahoma City.

The funding recommendations for the 2008-09 Action Year were considered by the Citizen’s Committee for Community Development on February 19, 2008, and received their favorable endorsement. The funding recommendations were next considered by the Neighborhood Conservation Committee on March 6, 2008, and received their favorable recommendation.

The sources and amounts of funding available for the 2008-09 4<sup>th</sup> Action Year, and the activities and allocations recommended for funding are:

**COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)**

Sources of Funds

Community Development Block Grant Entitlement Grant 2008-09	\$5,204,245.00
Estimated Recaptured Funds/Unallocated Program Income	\$230,764.43
Estimated 2008-09 Program Income	\$150,000.00
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Total Sources of CDBG Funds	\$5,585,009.43

**HOME INVESTMENT PARTNERSHIP PROGRAM (HOME)**

Sources of Funds

Home Investment Partnership Entitlement Grant 2008-09	\$2,830,362.00
* Estimated Recaptured Funds/Unallocated Program Income	\$2,023,840.66
Estimated 2008-09 Program Income	\$95,000.00
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Total Sources of HOME Funds	\$4,949,059.66

\* Allocation will be based on the amount of Down Payment Assistance funding recaptured at the close of the 2007-08 program year from all DPA program funding lines.

**AMERICAN DREAM DOWN-PAYMENT INITIATIVE (ADDI)**

Total ADDI funds allocated for 2008-09\* \$24,215.00

\* Allocated in HOME application of funds

**EMERGENCY SHELTER GRANT PROGRAM (ESG)**

Total ESG funds allocated for 2008-09 \$232,409

**HOUSING OPPORTUNITIES FOR PERSONS WITH HIV/AIDS (HOPWA)**

Total HOPWA funds allocated for 2008-09 \$459,000.00

**APPLICATIONS OF FUNDS**

Funding recommendations for the 2008-09 Action Year are:

**CDBG:**

**Decent Housing**

Oklahoma City Housing Assistance Program	\$1,085,500.00
Oklahoma City Housing Authority	\$231,600.00
Community Action Agency Emergency Home Repair	\$579,000.00
Graffiti Removal	\$14,800.00
Oklahoma City Abandoned Housing	\$67,600.00

**Suitable Living Environment**

Neighborhood Capacity Building	\$69,500.00
Neighborhood Improvement Projects	\$112,900.00
Share-A-Fare	\$52,100.00

**Economic Opportunity**

Community Action Agency Small Business Services	\$38,600.00
Section 108 Loan Repayment	\$1,394,060.43
Urban Renewal Authority	\$868,500.00

**Administration**

Planning and Administration	\$988,104.00
Metropolitan Fair Housing Council	\$82,745.00

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**TOTAL ALLOCATION OF CDBG FUNDS** \$5,585,009.43

**PRIOR YEAR CDBG PROJECTS/ACTIVITIES TO BE CARRIED FORWARD TO 2008-09 ALONG WITH ANY REMAINING FUNDS:**

Medical Center Building Blocks  
Public Works Projects  
Section 108 Projects:  
    American Indian Cultural and Educational Center  
    Dell Computer Corp  
    Gold Dome  
    Tower Tech  
    Section 108 Small Business Loan Fund

Urban Renewal Authority  
CDBG Revolving Loan Fund

**PRIOR YEAR CDBG PROJECTS/ACTIVITIES TO BE COMPLETED WITH ANY REMAINING FUND BALANCES BEING RECAPTURED:**

Community Action Agency Emergency Home Repair  
Community Action Agency Small Business Services  
Neighborhood Improvement Projects  
Neighborhood Capacity Building  
Oklahoma City Housing Authority  
Oklahoma City Housing Assistance Program  
Share-A-Fare  
Oklahoma City Abandoned Housing  
Graffiti Removal  
Metropolitan Fair Housing Council  
Planning and Administration

**HOME:**

American Dream Down-Payment Assistance 2008-09	\$24,215.00
Continuum of Care Projects (Match 2007-08 grant)	\$750,000.00
Continuum of Care Projects (Match 2008-09 grant)	\$500,000.00
Down-payment Assistance Program*	\$1,050,000.00
OKC Housing Assistance Program	\$1,000,000.00
Community Housing Development Organization (CHDO) set-aside	\$424,532.85
Community Housing Development Organization Loan Pool	\$200,000.00
Multi-family Rental and Workforce Housing Program	\$734,111.51
Planning and Administration	\$283,021.90

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**TOTAL ALLOCATION OF HOME & ADDI FUNDS** \$4,965,881.26

\* Allocation will be based on the amount of Down Payment Assistance funding recaptured at the close of the 2007-08 program year from all DPA program funding lines. The total recaptured funding plus \$600,000 new HOME allocation will be allocated 80% to targeted areas and 20% to the general DPA program area.

**PRIOR YEAR HOME PROJECTS/ACTIVITIES TO BE CARRIED FORWARD TO 2008-09 ALONG WITH ANY REMAINING FUNDS**

American Dream DPA, 2007-08  
Community Enhancement Corporation Permanent Homeless Housing  
(\$500,000 Match COC grant 06-07)

Continuum of Care Projects

- Continuum of Care Program Support
- City Care – Duplexes at Westlawn

Community Housing Development Organization Set Aside

Community Housing Development Organization Loan Projects

- South Council of Neighborhoods
- Urban League of Greater Oklahoma City
- Neighborhood Services Organization
- Jefferson Park Neighbors Association
- Neighborhood Housing Services

Non-Profit Affordable Housing Construction Loans

- Oklahoma City Housing Redevelopment Corp
- Habitat for Humanity Affordable Housing Lots #2
- City Care – 300 N Allen
- Duplexes at Westlawn

Oklahoma City Housing Assistance Program

Low-income Housing Tax Credit Support

- Urban League Mount Olive
- Urban League Capitol Square
- Central Urban Development (JFK Housing)
- Duplexes at Westlawn

Administration

**PRIOR YEAR HOME PROJECTS/ACTIVITIES TO BE COMPLETED WITH ANY REMAINING FUND BALANCES BEING RECAPTURED:**

Targeted Area DPA Program

General DPA Program

Permanent Housing for the Homeless

Continuum of Care Projects

Application Support for Affordable Housing Tax Credits

Multi-family Rental Pilot Program

**Emergency Shelter Grant (ESG)**

ESG funds are awarded through a Request for Proposals competition. A Grant Review Panel will make recommendations for funding. These recommendations will be presented to the Social Services Committee of the City Council for their recommendations before being presented to the City Council for final approval. All ESG funds will be allocated through this process to organizations providing shelter and services to the homeless.

**Total Allocation of ESG: \$232,409**

**Housing Opportunities for Persons with AIDS (HOPWA)**

HOPWA funds are awarded through a Request for Proposals competition. A Grant Review Panel will make recommendations for funding. These recommendations will be presented to the Social Services Committee of the City Council for their recommendations before being presented to the City Council for final approval.

Oklahoma City directly administers HOPWA funds through a contract with Red Rock Behavioral Health Services (Red Rock). Red Rock conducts outreach and distributes funds to provide services to persons living with HIV/AIDS in the Eligible Statistical Metropolitan Area (ESMA). The ESMA includes seven counties serving the needs of persons living with HIV/AIDS and their families.

**Total Allocation of HOPWA: \$459,000**

**Program Income**

Program income will be allocated as follows:

1. Program Income derived from CDBG funded housing rehabilitation loans, pledged as collateral for the Dell Section 108 Loan Guarantee, will be used payment of Section 108 principal and interest
2. Program Income generated from Section 108 Loan investment and repayment accounts will be used to pay Section 108 principal and interest
3. CDBG Program Income generated by the Urban Renewal Authority on the disposition of The Hill project will be allocated to Section 108 principal and interest payments less 20% funding for CDBG program administration
4. All CDBG Program Income will be used to create additional administrative capacity, and CDBG program income other than that pledged to Section 108 loan repayment may be used to fund administrative expenses during the program year in which it is realized
5. In accordance with CPD Notice 97-9, J., HOME Program Income deposited to the PJ's letter of credit and that creates additional Administrative capacity that shall be used by PJ for administrative expenses incurred during the Action Year, and any excess administrative capacity shall be carried forward to subsequent years
6. The Consolidated Plan provides for carry forward of excess administrative funding capacity resulting from HOME Program Income to successive years.

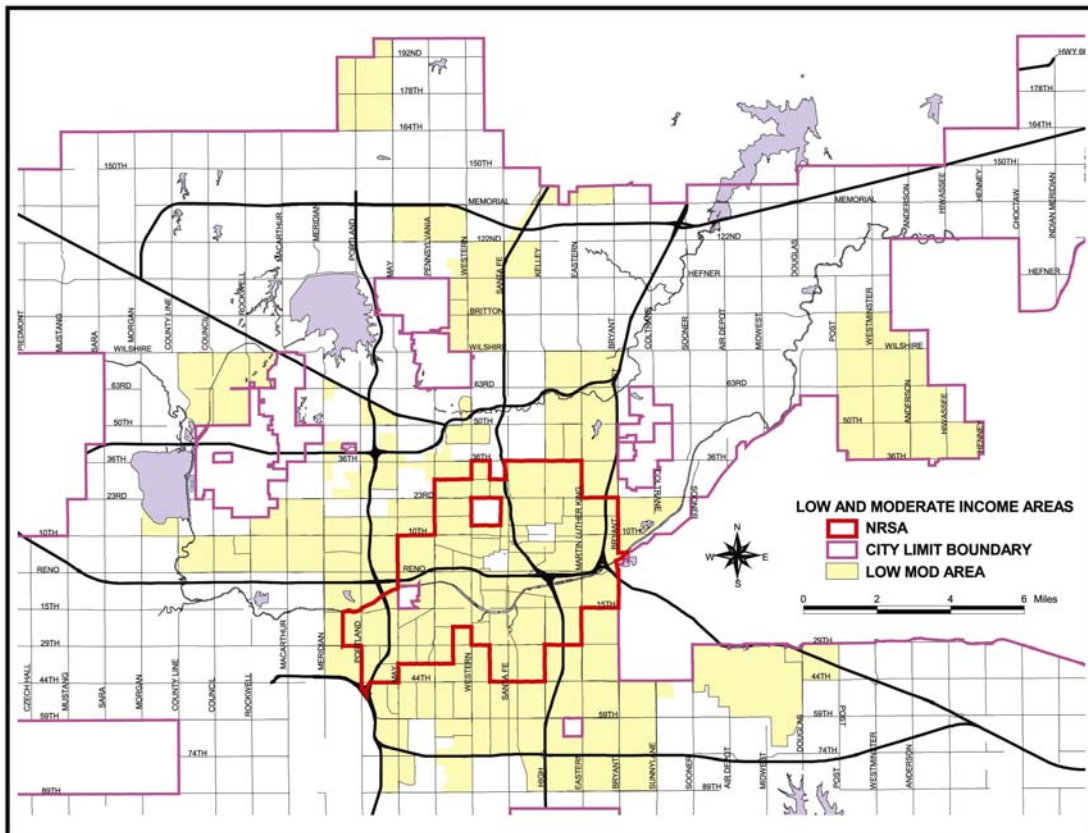
**General Questions**

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.
2. 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.
3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.

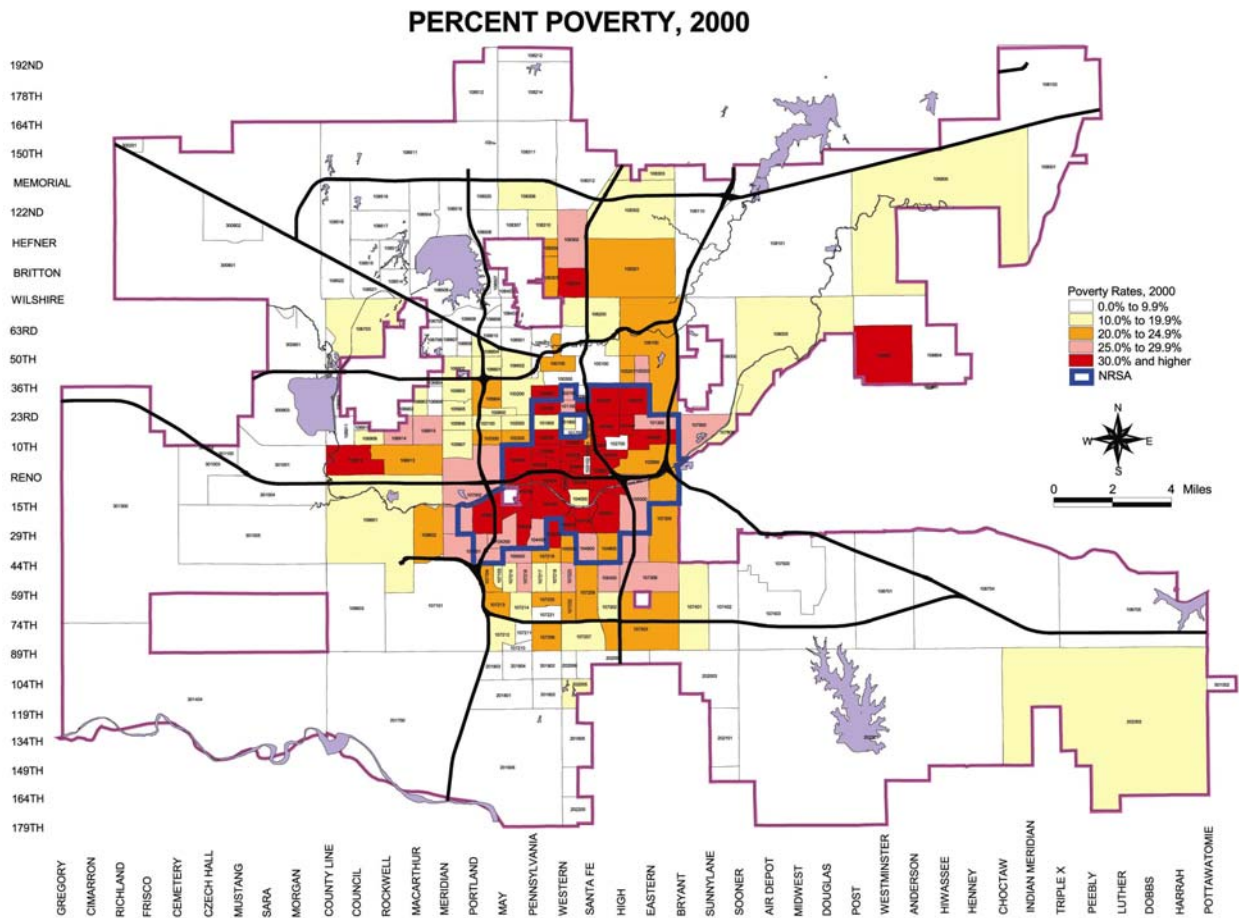
- Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

Program Year 4 Action Plan General Questions response:

Oklahoma City possesses 91 census tracts and 233 census block groups with persons of lower-income comprising 51% or more of the tract and/or block group’s total population. Low and moderate income eligible census tracts and block groups account for over 114 of the total 620 square mile land area contained in Oklahoma City’s corporate limits. The low and moderate-income census tracts and block groups, shown on the map below, are primarily concentrated in the central portion of community and within the City’s loop expressway system. These areas are classified in the City’s Comprehensive Plan as Traditional Neighborhoods and consist of mature neighborhoods and commercial areas that are 30-years of age or older – many of which suffer from high poverty rates, high vacancy rates, deferred property maintenance, and lower rates of home ownership.



Oklahoma City applied for and received from HUD a Neighborhood Revitalization Strategy Area (NRSA) designation for all or part of 47 of the low-income census tracts that cover an area of 29.5 square miles in the central city which are outlined in red on the map above. In addition, the NRSA contains approximately 20 square miles that lie in an area designated by HUD as both an Enterprise Community and an Empowerment Zone. The NRSA is the area of the central city that contains the highest rates of poverty in the City and the largest number of substandard residences – many of which require some remediation for lead-based paint. The NRSA has a poverty rate of 33.7%, which is more than double the 16.0% poverty rate of the City as a whole. The map below displays poverty rates by census tract for Oklahoma City.



The NRSA is an area of concentrated minority population in Oklahoma City. Racial distribution is displayed on the following table for the NRSA and Oklahoma City.

2000 Census of Population (SF-1)	NRSA		OKC	
	Num	Pct	Num	Pct
Total Persons	77,139		506,132	
White	35,763	46.4%	346,226	68.4%
Black	20,326	26.3%	77,810	15.4%
American Indian	3,922	5.1%	17,743	3.5%
Asian/Hawaiian	2,116	2.7%	17,955	3.5%
Other	11,586	15.0%	26,705	5.3%
Multi-Race	3,426	4.4%	19,693	3.9%
Hispanic	20,720	26.9%	51,368	10.1%
Total Minority	48,697	63.1%	178,907	35.3%

The expenditure of entitlement grant funding will be concentrated in the NRSA and low and moderate-income qualified census tracts and block groups. The City, to the greatest extent possible, will invest up to 80% of CDBG and HOME in the NRSA. Exceptions may be permitted with prior approval of the Planning Department with regard to the expenditure of funds allocated for down payment assistance and Oklahoma City’s housing rehabilitation program activities if funds targeted for use in the NRSA are not fully utilized within the first nine months of the program year.

**Basis for allocating investments geographically within the jurisdiction**

As mentioned above, Oklahoma City continues to focus activity in the NRSA as the area where most Federal funds will be expended to benefit the highest concentrations of lower-income residents. The NRSA was chosen because it surrounds the center of the city, contains a large segment of the lower-income population, and is in need of residential assistance including lead-based paint remediation.

Both CDBG and HOME funds are allocated to activities that provide the greatest potential for benefit to lower-income residents. Historically, funded activities have been focused on housing and economic development. A brief summary of program activities is provided below.

- Housing Rehabilitation (Whole House)
- Home Exterior Maintenance Repair
- Emergency Home Repair
- Provision of new housing through rehabilitation or new construction for transitional use, rental, and sale
- Abandoned Housing and Graffiti Removal
- Fair Housing
- Historic Preservation
- Lead-based Paint Hazards
- Continuum of Care Permanent Housing for the Homeless
- Down-payment Assistance
- Neighborhood Capacity Building

- Neighborhood Improvement Projects
- Public Services
- Economic Development Assistance and job creation to both small and large businesses, including Section 108 projects
- Urban Renewal

### **Obstacles for Meeting Underserved Population Needs**

A new “point in time” homeless count was conducted on January 25, 2007 that included persons living in emergency shelters and transitional housing, meal sites, a detoxification center, the county jail, and homeless persons living on the street. The Count also used a helicopter to spot homeless encampments. The number of homeless persons counted is 1,930.

A network of service providers developed a “Homes for the Homeless – 10 Year Plan to Create Lasting Solutions” (adopted by the City Council in July, 2004) based on their assessments of homeless needs. Some of the Plan elements provide for increasing knowledge about homeless persons, tracking those that are chronically homeless, building a network of problem solvers, developing funding sources and a performance based funding plan, developing standards for shelters and other homeless housing, obtaining public support for serving the needs of the chronically homeless, and improving access to services. Various participating agencies are assigned the responsibility for attaining the stated goals to the greatest extent practicable. The plan is reviewed and updated annually. In 2007, the Mayor appointed a Homelessness Action Task Force focusing on housing and supportive service needs and the location of shelters and services. The final report reinforced the need for additional permanent supportive housing.

Despite improvements in facilities to house the homeless, more permanent supportive housing is needed. The lack of permanent supportive housing for the chronically homeless is one of the major deficiencies because this population is the most difficult to serve.

The Point in Time homeless count concludes there is an adequate number of shelter beds and transitional housing available; and highlights the need for additional permanent supportive housing.

Oklahoma City has allocated HOME funds for permanent supportive housing to match Continuum of Care grants, and will continue to do so. The City has allocated HOME funds to provide for the transition of homeless persons to homeownership; HOME funds are being used to initiate permanent housing for this same population.

### **Additional Sources of Funds Available to Aid in Accomplishing Goals and Objectives:**

#### **Low-income Housing Tax credits**

The Oklahoma Housing Finance Agency’s (OHFA) updated list of affordable housing tax credit projects shows 44 Affordable Housing Tax Credit projects in Oklahoma City that contain 4,832 housing units, 2,626 of which are assisted units. In addition, OHFA has 5 additional projects in Oklahoma City that are under construction that will contain 646 units all of which are affordable under OHFA program guidelines.

#### **Public and Section 8 Housing**

The Oklahoma City Housing Authority owns and operates 3,140 low-rent public housing units and provides approximately 3,860 Section 8 vouchers.

**Continuum of Care**

\$887,222 in Homeless Assistance Awards for the Supportive Housing Program was awarded for assistance in FY 2005 in nine separate grants awards. \$2,278,535 in Homeless Assistance Awards for the Supportive Housing Program was awarded for assistance in FY 2006 in twelve separate grant awards. In FY 2007, \$2,300,735 in Homeless Assistance Awards for the Supportive Housing Program was provided in ten separate grant awards.

**Emergency Shelters**

Nine organizations administer 643 year-round emergency shelter beds in the community and provide 152 over-flow vouchers; \$232,440 was available in emergency shelter grants in 2005-06, \$231,465 in 2006-07, \$233,340 in 2007-08, and \$232,409 will be available for FY 2008-09.

**Transitional Housing**

Fourteen organizations manage 591 year-round beds of transitional housing to serve the needs of persons with disabilities.

**Permanent Housing**

Four agencies manage 150 existing permanent housing beds/units for persons with disabilities and an additional 12 are to be developed by Community Enhancement Corporation.

**Housing Opportunities for Persons with HIV/AIDS**

\$459,000 is allocated for the HOPWA Program in 2008-09.

**Homeless Assistance**

Seven organizations are funded with \$219,892 in grant funds to provide shelter and services to homeless individuals and families. The funds were used to assist 5,883 homeless persons between July 1, 2006 through June 30, 2007.

**Number of Persons Served with ESG Grant**

<u>Agency</u>	<u># Served</u>
Birth Choice/Rose Home	35
Traveler's Aid	443
Sunbeam	109
Community Health Center/Healing Hands	3,453
Red Rock	39
Salvation Army	1,804
<b>Total</b>	<b>5,883</b>

Additionally, Transit Services provided transportation services for the homeless: 51,027 bus passes and 1,663 taxi fares.

Oklahoma City provided an additional \$121,000 in Social Service funds to ten programs to provide homeless services.

### **Other Assisted Housing**

Various HUD assistance programs, such as Section 202, Section 236, etc., are assisting 633 elderly units and 1,085 general occupancy units.

### **Private Investment**

- Mortgage loan funds invested in residential property assisted with HOME DPA funds
- Mortgage loan funds invested in residential property assisted in the purchase/rehab program
- Proceeds from sale of tax credits invested in assisted projects
- Federal Home Loan Bank down-payment assistance
- Client matching funds in the Share-a-Fare Program
- Neighborhood Improvement grant matching funds
- Habitat for Humanity housing investment funds
- Commercial investment match for Murrah Loan program
- Mortgage loan funds invested in residential property assisted through construction loans to nonprofit organizations
- Federal Home Loan Bank assistance to nonprofit housing

### **Evaluation of Past Performance**

#### **Low-Moderate Income Spending Ratio**

Oklahoma City has been successful in maintaining required spending ratios in the CDBG program both in spending for the benefit of low and moderate-income persons and in timeliness of overall spending.

The Grantee Performance Report for the one-year period ending June 30, 2007 reports low/moderate benefit spending at 79.44%. The cumulative low/moderate income ratio is likewise 79.44% because 2006-07 was the first year of the 3-year cumulative average. The 2007-08 data will not be available until June 30, 2008.

#### **Section 108 Loans**

Over the past three years, HUD has approved the following Section 108 Loan Guarantees in Oklahoma City:

- |   |             |
|---|-------------|
| • Skirvin Hotel                                   | \$4,816,000 |
| • American Indian Cultural and Educational Center | \$3,250,000 |
| • Small Business Loan Fund                        | \$4,000,000 |
| • Gold Dome                                       | \$1,000,000 |
| • Dell Business Services Center                   | \$4,716,000 |

The City has drawn all or portions of the funds associated with these loan guarantees and will continue to draw on the available balances as the projects progress over the next few years.

During the 2006-07 program year, the City repaid in full the Skirvin Section 108 loan Guarantee and has repaid \$1,625,000 of the American Indian Cultural Center Section 108 Loan Guarantee. In 2008-09, the City anticipates repaying the remaining \$1,625,000 outstanding loan balance in full. In addition, the City will begin principal repayment of the Dell Section 108. The first required principal payment is \$41,000.

### **Overall CDBG Grant Spending**

Oklahoma City is maintaining a CDBG spending ratio of less than 0.5% that is well within HUD 1.5% guidelines for efficient spending of CDBG funds.

### **Overall HOME Grant Spending**

Oklahoma City is in compliance with the HUD guidelines for efficient spending of HOME funds. The City continues to commit HOME funds in the required 24-month period and expend funds within the required 5-year term..

### **Overall ESG Spending**

ESG funds are usually exhausted in the fiscal year for which they are allocated; any remainder is recaptured and reallocated to an activity or organization serving the greatest need.

### **Overall HOPWA Spending**

Oklahoma City contracts with Red Rock Behavioral Health Services (Red Rock) to provide housing and supportive services to persons diagnosed with HIV/AIDS and their families residing in the Eligible Statistical Metropolitan Area. Red Rock is a member of the Oklahoma HIV Treatment and Care Consortium and the Coalition of the Needy. In its planning, Red Rock identifies client and provider needs and ensures that clients receive the most effective and efficient health and/or social services by building and maintaining strong relationships with other health and social service organizations, including consumer advocates. Red Rock has formal memoranda of agreement with the AIDS Coalition of Tulsa, AIDS Legal Resource Project/Legal Aid of Western Oklahoma, Community AIDS Network, Inc.-Stillwater, Elisha House, Healing Hands Health Care Services, HIV Resource Consortium d/b/a Tulsa C.A.R.E.S., Oklahoma Department of Human Services, Planned Parenthood of Central Oklahoma, Rightway Medical, Southwest AIDS Network, Inc.-Lawton, Youth and Family Services, Inc. and the YWCA Crisis Services.

## **Managing the Process**

1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.
2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.
3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

Program Year 4 Action Plan Managing the Process response:

### **Lead Agency**

The Community Development Division of the Oklahoma City Planning Department is the lead agency responsible for the development of the Consolidated Plan and for administering the various programs and activities established in and funded by the Consolidated Plan.

### **Process/Coordination**

The process for development of the Fourth Action Year Plan is initiated by a citizen input meeting held to discuss past program accomplishments, eligible grant activities and community development needs within the community. Comments and recommendations from the citizen input meetings are forwarded to the Citizens Committee for Community Development (CCCD). The CCCD is an advisory committee established in the 1970's to review and make recommendations on entitlement grant programs and activities. The CCCD, after review and deliberation, forwards the proposed Action Plan and funding recommendations to the Neighborhood Conservation Committee of City Council (NCC). The NCC, after its review and deliberation, forwards its recommendation on to the full City Council. All meetings are open to the public and are posted so interested persons and organizations can be alerted to meeting times and dates.

The process concludes by the publication of a public notice on the Action Year Plan in *The Oklahoman*, the general circulation newspaper in Oklahoma City. The notice sets forth the proposed sources and uses of funds that have been recommended by both the Citizens Committee for Community Development and the Neighborhood Conservation Committee of City Council. The Notice sets a 30-day period for citizens to submit written comments to the Planning Department prior to the final public hearing before the City Council. All written comments receive a written response. Comments on the Action Year Strategy and the written responses are submitted with the Action Year application.

Finally, a notice of a public hearing before the City Council is published to provide adequate notice to the public of the subjects and proposals that will be considered and/or changes and amendments that will be considered by the Council. The public hearings afford citizens with another opportunity to give their advice and comments to the City Council before the Council takes action to amend or adopt the proposed activities and funding allocations.

### **Enhanced Coordination**

The Oklahoma City Planning Department's Community Development Division coordinates and provides staff support to the Citizens Committee for Community Development, Continuum of Care Committee, the Social Services Committee and the Neighborhood Conservation Committee.

The Citizens Committee for Community Development is the citizen oversight body that reviews programs and recommends entitlement grant funding allocations; reviews and makes recommendation on major Consolidated Plan changes; and considers and makes recommendation concerning the Consolidated Plan and Action Year Plan proposals.

The Planning Department provides staff support to the Continuum of Care Committee (CCC). The CCC consists of organizations seeking to identify homeless needs and service gaps, to identify resources available to meet needs, and to formulate applications for funds to fill unmet

needs and services in the community.

The Neighborhood Conservation Committee (NCC) is a subcommittee of the City Council and is composed of three Council members. The NCC reviews and provides recommendations to the City Council on all entitlement grant programs.

The Social Services Committee (SSC) is a subcommittee of the City Council and is composed of three Council members. This Committee reviews funding recommendations concerning the Emergency Shelter Grant program, Continuum of Care, and other social programs of the City. The SSC reviews proposals, consider allocations, and makes recommendations to the City Council on social services funding.

The City will continue to serve as the lead agency in the management and coordination of all issues identified and recommended for funding by the various committees. The Planning Department's staffing of the committees and its knowledge and experience with Federal programs continues to enhance coordination of these activities.

### **Citizen Participation**

1. Provide a summary of the citizen participation process.
2. Provide a summary of citizen comments or views on the plan.
3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.
4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

\*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.  
Program Year 4 Action Plan Citizen Participation response:

In accordance with the City's Citizen Participation Plan, a "Notice of Public Meeting" was published informing citizens of the opportunity to comment and have input on activities for the 2008-09 Action Year Plan. The community meeting was held on January 10, 2008 in the City Council Chambers at 6:30 p.m. The meeting notice was published on December 21, 2007 to provide the public two weeks notice of the intended meeting. In addition, citizens were invited to direct inquiries and written comments to the Community Development Division regarding the 4<sup>th</sup> Action Year Plan.

The meeting was convened at the advertised place and time. The purpose of the meeting was to inform citizens of forthcoming grant allocations, to acquaint citizens with the uses that could be made of such funds, and to provide a forum for citizens to comment on underserved needs and to comment on activities funded in the past year and proposals for the forthcoming Action Year. The discussion at the meeting focused on the continuation of the Share-a-fare program for providing discounted taxi services to the elderly and persons with disabilities. The meeting attendees were invited to attend the Citizens Committee for Community Development meeting scheduled for January 22, 2008, to further discuss the 4<sup>th</sup> Action Year Plan. The attendees of the meeting were informed that HUD's 2008-09 budget was not approved, therefore funding levels for the entitlement grants was uncertain.

The Citizens Committee for Community Development convened a second public meeting on January 22, 2008 in the 9<sup>th</sup> floor conference room at 420 West Main Street, Oklahoma City at 4:00 p.m. Planning staff discussed the Consolidated Plan and all projects currently funded in the 3<sup>rd</sup> Action Year Plan.

On February 19, 2008, the Citizens Committee conducted its third meeting on the Fourth Action Year Plan. The Committee reviewed and recommended approval of the final funding recommendations. The funding recommendations were forwarded to the City Council Neighborhood Conservation Committee for their review and consideration on March 6, 2008. The Neighborhood Conservation Committee reviewed and recommended approval of the Fourth Action Year Plan.

Notice of all public meetings was posted as required by City and State policy and regulation.

The executive summary of the Fourth Action Year Plan and proposed amendments to the Consolidated Plan were published in the Oklahoman on April 2, 2008, and established a 30-day comment period during which citizens and organizations could submit written comments on the proposed activities and funding allocations for the 2008-09 fiscal year. Written responses are prepared for comments received are included in the application submission to HUD.

On April 15, 2008 notice was published in the Oklahoman of a public hearing to consider the proposed Consolidated Plan amendments and the Third Action Year Plan by the City Council on May 6, 2008. On May 6, 2008, the public hearing was conducted and the Plan amendments and Fourth Action Year Plan were approved without comment.

No written comments were received on the 4<sup>th</sup> Action Year Plan during the 30-day comment period.

## **Institutional Structure**

1. Describe actions that will take place during the next year to develop institutional structure.

Program Year 4 Action Plan Institutional Structure response:

A staff representative is assigned to serve as a liaison with service providers at the public and private levels and to assist them in making applications for competitive funding through the various Continuum grants and supportive housing programs. The staff representative provides assistance to applicants with other grant activities funded through the entitlement grant programs.

The City's representative provides technical assistance through regular meetings with committees composed of service provider representatives and interacts with them as they review programs and make changes to accomplish their goals.

The organizations that will assist the City in conducting activities proposed in Fourth Action Year Plan include:

- Oklahoma City Housing Authority for the rehabilitation of low-rent public housing units
- Community Action Agency to conduct an emergency home repair program
- City of Oklahoma City Housing Assistance Program for whole house rehabilitation, Home Exterior Maintenance Program for lower-income persons; Home Ownership

Opportunity Program, a partnership with MidFirst Bank in a purchase/rehabilitation program

- Community Action Agency and Neighborhood Housing Services to provide access to down-payment assistance programs administered by the City
- CityCare funded to provide permanent rental housing to the homeless; to provide new single family housing to the homeless through a lease/purchase program
- Neighborhood Housing Services CHDO-new affordable single-family housing
- Latino CDA CHDO- new affordable single-family housing
- Paseo CHDO- new affordable single-family housing
- Neighborhood Services Organization- new affordable single-family housing and new rental housing
- South OKC CHDO- new affordable single-family housing
- Urban League CHDO- new affordable single-family housing
- Jefferson Park CHDO- new affordable single-family housing
- City funded neighborhood capacity building program
- City funded program to construct new or rehabilitate multi-family housing in targeted neighborhoods
- City funded permanent supportive housing for the homeless to match Continuum of Care funds
- City funded neighborhood improvement projects
- City sponsored transportation assistance to the elderly and disabled
- City funded graffiti removal program
- City administered abandoned housing program

## Monitoring

1. Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

Program Year 4 Action Plan Monitoring response:

Oklahoma City monitors all activities funded with federal grants. A compliance review is conducted for all subrecipients on an annual basis.

Audits:

1. The City's internal auditors randomly audit various programs in City Departments. In addition, the City Auditor's Office audits programs in response to complaints that the Office receives.
2. An independent audit is conducted for federally funded activities annually to determine compliance with grant provisions using federal guidelines. Responses to exceptions and corrective actions are reviewed by the City Manager, City Council, City Auditor and the independent auditing firm.
3. Agreements with subgrantees require annual independent audits be conducted and that copies of the audit be provided to the City. The audit reports are reviewed along with corrective actions for any exceptions identified.

4. A review of the documentation in support of federal drawdown requests is made by the City's Finance Department and is required to access the funds through the City's procurement system.

Activities that are not funded by the City are monitored through reports and review of minutes of committees and agencies, and through staff participation on or attendance at meetings of various committees and boards.

When subgrantees are monitored, the following procedure is used:

1. Prepare schedule of monitoring visits
2. Notify subrecipients of date(s) set for monitoring visit(s)
3. Review with subrecipient the monitoring checklist that will be used as a monitoring guide
4. Conduct the monitoring review:
  - a. Check minutes of Board meetings for actions, authorizations affecting operations, expenditures, personnel actions, etc
  - b. Review time records and other documents relating to time spent on activity.
  - c. Check deposit records
  - d. Check expenditures by examination of vouchers, supporting documentation, canceled checks and determine eligibility of costs
  - e. Determine that books of account agree with reports submitted by funded agency
  - f. Review records to determine eligibility of low/moderate beneficiaries
  - g. Determine that funds requested are spent in a timely manner, if applicable
  - h. Conduct an exit review of concerns/findings
  - i. Review monitoring visit with supervisor
  - j. Prepare written report to Board Chairperson/President relating the method of review, determination of compliance, concerns, findings or other appropriate comments. Letter should set a deadline for correction or submission of information. Letter should offer technical assistance if appropriate
  - k. Reports on subgrantee monitoring are presented to the Division Head of the grants management division for review

### **Lead-based Paint**

1. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

Program Year 4 Action Plan Lead-based Paint response:

The City's housing rehabilitation staff inspectors are all State certified as lead-based paint inspectors, testers, risk assessors, and clearance inspectors. All properties that are proposed for rehabilitation, utilizing the federal funds, are inspected with regard to code compliance. The inspection report includes a specific section for determining what needs to occur to clear the property of lead hazards. Work specifications are prepared to accomplish the necessary lead hazard abatement. The specifications are included in the bids received from state certified contractors.

## HOUSING

**Specific Housing Objectives**

\*Please also refer to the Housing Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Program Year 4 Action Plan Specific Objectives response:

The City expects to accomplish the following specific housing objectives in 2008-09:

<b>Matrix Code</b>	<b>Program</b>	<b>Objective</b>	<b>Allocation</b>
<b>06</b>	<b>Interim Assistance</b>	<b>148</b>	<b>\$67,600.00</b>
	Abandoned Housing	148	\$67,600.00
<b>12</b>	<b>Construction of Housing</b>	<b>32</b>	<b>\$1,340,151.52</b>
	CHDO Set-aside & Loan Pool	20	\$424,554.30
	CHDO Loan Pool	0	\$200,000.00
	Continuum of Care match (2007-08 and 2008-09)	12	\$1,250,000.00
<b>13</b>	<b>Direct Home Ownership Assistance</b>	<b>150</b>	<b>\$1,325,600.54</b>
	Down Payment Assistance (Target Area)	120	\$859,372.00
	Down Payment Assistance	30	\$214,843.00
<b>14A</b>	<b>Rehab Single Unit Residential</b>	<b>154</b>	<b>\$2,664,500.00</b>
	OKC Housing Assistance Program	54	\$2,085,500.00
	Emergency Home Repair	100	\$579,000.00
<b>14B</b>	<b>Rehab Multi-Family Residential</b>	<b>8</b>	<b>\$741,612.16</b>
	Multi-Family Rental Pilot Program	8	\$741,612.16
<b>14C</b>	<b>Public Housing Modernization</b>	<b>17</b>	<b>\$231,600.00</b>
	Oklahoma City Housing Authority	17	\$231,600.00

The activities listed are based on grant funds awarded to the City for the 2008-09 fiscal year and prior year funding recaptured and reallocated.

**Additional Sources of Funds Available to Aid in Accomplishing Goals and Objectives:**

**Low-income Housing Tax credits**

The Oklahoma Housing Finance Agency's (OHFA) updated list of affordable housing tax credit projects shows 44 Affordable Housing Tax Credit projects in Oklahoma City that contain 4,832 housing units, 2,626 of which are assisted units. In addition, OHFA has 5 additional projects in

Oklahoma City that are under construction that will contain 646 units all of which are affordable under OHFA program guidelines.

### **Public and Section 8 Housing**

The Oklahoma City Housing Authority owns and operates 3,140 low-rent public housing units and provides approximately 3,860 Section 8 vouchers.

### **Continuum of Care**

\$887,222 in Homeless Assistance Awards for the Supportive Housing Program was awarded for assistance in FY 2005 in nine separate grants awards. \$2,278,535 in Homeless Assistance Awards for the Supportive Housing Program was awarded for assistance in FY 2006 in twelve separate grant awards. In FY 2007, \$2,300,735 in Homeless Assistance Awards for the Supportive Housing Program was provided in ten separate grant awards.

### **Emergency Shelters**

Nine faith and community based organizations administer 643 year-round emergency shelter beds in the community and have the capacity for 152 over-flow beds for emergency use.

### **Transitional Housing**

Fourteen faith and community based organizations manage 591 year-round beds of transitional housing to serve the needs of persons with disabilities.

### **Permanent Housing**

Four agencies manage 150 existing permanent supportive housing beds/units for persons with disabilities and an additional 12 are to be developed by Community Enhancement Corporation.

### **Homeless Assistance**

Six faith and community based organizations funded through HUD's Homeless Assistance Programs leveraged \$7,307,277 in private and other governmental funding to provide an array of services to homeless persons.

Oklahoma City provided an additional \$121,000 in Social Service funds to eleven programs to provide homeless services.

### **Other Assisted Housing**

Various HUD assistance programs, such as Section 202, Section 236, etc., are assisting 633 elderly units and 1,085 general occupancy units.

### **Private Investment**

- Mortgage loan funds invested in residential property assisted with HOME DPA funds
- Mortgage loan funds invested in residential property assisted in the purchase/rehab program
- Proceeds from sale of tax credits invested in assisted projects
- Federal Home Loan Bank down-payment assistance
- Client matching funds in the Share-a-Fare Program
- Neighborhood Improvement grant matching funds
- Habitat for Humanity housing investment funds
- Commercial investment match for Murrah Loan program

- Mortgage loan funds invested in residential property assisted through construction loans to nonprofit organizations
- Federal Home Loan Bank assistance to nonprofit housing

### **Needs of Public Housing**

1. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.
2. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

Program Year 4 Action Plan Public Housing Strategy response:

CDBG funds are allocated annually to the Oklahoma City Housing Authority for the rehabilitation of low-rent public housing units. This has been an ongoing program activity for over 20 years.

Planning Department staff, on a periodic basis, participates in the Oklahoma City Housing Authority's Homebuyer Education Classes. Outreach is provided through the homebuyer classes to Housing Authority tenants desiring to participate in the down-payment assistance program and through other Housing Authority programs aimed at self-sufficiency and homeownership. Brochures are provided containing information on the various home ownership services available in the community.

The Housing Authority (HA) has resident programs that include resident councils and family self-sufficiency programs. HA programs for tenants and Section 8 recipients assist clients with becoming homeowners. Housing Authority residents can apply to the City's outlets for down-payment and closing cost assistance.

The Oklahoma City Housing Authority is not listed by HUD as a "troubled" housing authority

### **Barriers to Affordable Housing**

1. Describe the actions that will take place during the next year to remove barriers to affordable housing.

Program Year 4 Action Plan Barriers to Affordable Housing response:

The City has been active in trying to reduce potential barriers to the construction of affordable housing. The steps taken by the City to reduce barriers include:

1. Adoption of the International Existing Building Code. The International Code applies to multi-family housing and reduces financial barriers to renovating existing building by allowing greater flexibility in materials used in the renovation
2. Exemption of Impact Fees. Single-family residential fees for accessing water and sewer lines in the core area of the city are waived to reduce the cost of infill housing and other redevelopment efforts

3. Exemption of Permit Fees. The City has exempted the fees for permits to nonprofit builders of affordable housing
4. No A/E Certification Requirement. The City does not require engineering or architectural seals for nonprofit affordable housing developers
5. Exemption of Permit Fees. Building permit fees are waived by policy for nonprofit charitable organizations engaged in the construction or remodeling of one or two family dwellings for the purpose of providing housing assistance to low-income persons or households
6. No Licensing Requirement. There are no licensing requirements for builders or professionals except in the case of high-rise structures

The City of Oklahoma City's tax structure is not a barrier to affordable housing. Local governments in the State of Oklahoma are funded primarily on proceeds from sales taxes. Ad valorem taxes are only used to fund general obligation bond indebtedness at the local government level. Primarily, property taxes fund the public school system, the county general fund, the health department, the vocational education system and the metropolitan library system.

The corporate limits of Oklahoma City extend into four counties with each county possessing different property assessment and ad valorem tax levies. The differences in tax collection are based on the funding needs and debt authorization for each county, school district, and vocational education district within each county. In all instances, changes in millage rates are subject to referendum.

The majority of Oklahoma City's population and land area is situated within Oklahoma County. The Oklahoma County Board of County Commissioners assists the City with the provision of affordable housing by donating to the City vacant and abandoned housing sites. The City, for the express purpose of constructing affordable housing, subsequently deeds the donated properties to a nonprofit housing developer. Typically, the donated property is suitable for infill housing and does not require any amendments to current zoning. However, if a parcel is not properly zoned, an application fee for rezoning is required. In some cases a rezoning request may originate from the City Council for the benefit of a nonprofit housing developer. On those occasions, there is no fee.

In short, "Affordable housing" is being constructed and is selling to household qualified as lower-income. In some cases, the cost of the housing is adjusted and the federally funded program absorbs the gap to make a property affordable to a particular low-income buyer.

It is typically the City's policy to support the development of affordable housing with little or no adverse affect on the cost. The grants management staff monitors changes in policy and codes that pose adverse affect on the development of affordable housing to eliminate or reduce impacts on affordable housing programs.

### **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.

Program Year 4 Action Plan HOME/ADDI response:

### **Forms of Assistance**

In accordance with the provisions of 92.205(b), HOME funds will be allocated to provide down payment assistance to homebuyers. The activity will be divided into two programs that include the Targeted Area DPA and General DPA programs. The Targeted Area DPA program will provide down payment assistance in those locations defined as the Neighborhood Revitalization Strategy Area; Community Housing Development Organizations and non-profit housing developer targeted areas; locations where HOME funds are being invested to assist with the development of an affordable housing development; and areas of low and moderate income located outside the General DPA program boundary targeted by City Council for special consideration. The General DPA Program area is defined as the low and moderate income census tracts and block groups within the area of the city bounded by Memorial Road to the north, Bryant Avenue to the east, South 89<sup>th</sup> Street to the south and Meridian Avenue to the west. HOME and ADDI Down payment assistance is provided in the following manner:

- American Dream Down-payment Assistance is provided to eligible first-time homebuyers purchasing a home in the Neighborhood Revitalization Strategy Area (NRSA). The funding is provided as a \$6,000 loan that is forgivable at the rate of 1/60<sup>th</sup> per month over a five-year affordability period
- Targeted area HOME down payment assistance provides a loan up to \$6,000 that is forgivable at the rate of 1/60<sup>th</sup> per month over a five-year affordability period to eligible homebuyers or a \$10,000 loan that is forgivable at the rate of 1/60<sup>th</sup> per month over a five-year affordability period for eligible homebuyers of properties built or rehabilitated by CHDOs.
- General DPA program down payment assistance is provided as a \$3,500 loan that is forgivable at a rate of 1/60<sup>th</sup> per month over a five-year affordability period to eligible homebuyers.
- HOME down-payment assistance, in the amount of \$10,000, is available to assist all CHDO organization lower-income homebuyers in conjunction with Non-profit and CHDO loans at 0% for the construction of new affordable single family and duplex housing over appropriate affordability periods.

### **Specific Use of ADDI funds**

American Dream Down-payment Assistance is provided to eligible first-time homebuyers purchasing a home in the Neighborhood Revitalization Strategy Area (NRSA). The funding is provided as a \$6,000 loan that is forgivable at the rate of 1/60<sup>th</sup> per month over a five-year affordability period.

The Oklahoma City Housing Authority, Community Action Agency and Neighborhood Housing Services conduct outreach and perform affirmative marketing for all DPA programs that include ADDI and HOME programs. In addition, Community Action Agency and Neighborhood Housing Services process applications for clients seeking either ADDI or HOME DPA assistance.

All recipients of ADDI and HOME DPA assistance are required to attend and receive certification as having completed HUD approved Homebuyer Education and/or First-time Homeowner Counseling classes.

### **Other Housing Assistance**

- Permanent supportive housing for the homeless in combination with Continuum of Care grant funds
- Financing of new construction or acquisition and rehabilitation of multi-family housing projects awarded on a competitive basis.
- Oklahoma City Housing Assistance Programs that includes Housing Rehabilitation, Lead Based Paint Grants, Home Ownership Opportunity, and Housing Exterior Maintenance Programs
- Community Action Agency Emergency Home Repair Program
- Community Housing Development Organization set-aside for affordable new and rehabilitated housing.
- Multi-family rental housing development
- Community Development Housing Organization operating costs.
- Planning administration

### **Homebuyer Assistance Resale and Recapture Provision**

The Homebuyer Assistance Programs funded by Oklahoma City will utilize the Recapture Method provided in the HOME Regulations at 92.254(a)(5)(ii). The participating jurisdiction will recoup all or a portion of the HOME assistance to the homebuyers, if the assisted housing does not continue to be the principal residence of the family for the duration of the period of affordability. HOME funds will be recouped based on the forgivable loan terms and on the sharing of net proceeds provided in the HOME regulations at 92.254(a)(5)(ii)(A)(3).

### **Refinance of debt secured by multi-family housing.**

HOME funds will not be used to refinance existing debt secured by multi-family housing.

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## HOMELESS

### **Specific Homeless Prevention Elements**

\*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

1. Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction’s plan for the investment and use of funds directed toward homelessness.
2. Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.
3. Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.
4. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.
5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.

Program Year 4 Action Plan Special Needs response:

The City expects to receive entitlement grants for the Emergency Shelter Grant Program (ESG), the Housing Opportunities for Persons with HIV/AIDS Program (HOPWA), the Home Investment Partnership Program (HOME), competitive grant awards for the Continuum of Care and Supportive Housing Programs. Coordination with State agencies and organizations such as the Governor’s Interagency Council on Homelessness, Department of Health, Department of Mental Health and Substance Abuse, Community Mental Health agencies, Department of Human Services, Community Action Agencies, faith based organizations, private foundations

who donate to various organizations.

The Board of Commissioners of Oklahoma County honors requests made by the City for sites owned by the County from their tax foreclosed inventory. The requests are made by non-profit organizations and property is passed through to them for construction of affordable housing. Some of the requested sites are for transitional housing for the homeless and special populations with chronic problems.

The City participates in the planning process and activities to render shelter and social services to the homeless by consolidating applications for assistance through committee structures. The Continuum of Care Committee and the Council Social Services Committee have engaged partnering organizations to develop a plan focused on ending homelessness during the next ten-years. The Ten-Year Plan to end homelessness is being implemented. Specific obstacles expected are resistance of clients to participate in regimens, lack of funds, and lack of sponsors to manage housing. The Plan is elaborated on in the Consolidated Plan document.

To augment the Ten-Year Plan, the City has allocated funding in the Consolidated Plan to provide permanent housing for the chronically homeless. The first phase has produced 32 housing units. HOME funds set-aside for permanent supportive housing are used in support of the City's Continuum of Care grant application. A PACT grant provides funding for services.

Funds have been allocated to a permanent housing set-aside activity that may be accessed for use with other public or private funds or "banked" until a sufficient amount is accumulated to start a second project. It is expected this activity will continue in the future as an answer to the need for permanent supportive housing for the homeless.

The ESG grant is used to cover shelter, utilities and other eligible costs, and to provide services to the homeless.

Obstacles to addressing the needs of the homeless and chronically homeless are essentially the same

- Lack of sufficient funds
- Lack of sponsors for permanent supportive housing

In both cases, many of the key players are governmental units that are barred from owning and operating facilities at taxpayer expense. Private, quasi-governmental units with private donations just do not have the funds it takes to acquire and operate the needed facilities.

The Discharge Policy of hospitals serving mentally disabled persons provides for the notification of service provider agencies of individuals being released. The agency contacted assigns social workers to meet and initiate case management and guidance for the individuals concerned. Follow-up care is dependent on the individuals to comply with the case managers and health care provider prescribed treatments.

### **Emergency Shelter Grants (ESG)**

(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

Program Year 4 Action Plan ESG response:

Not applicable – City of Oklahoma City is a unit of local government

## COMMUNITY DEVELOPMENT

### Community Development

\*Please also refer to the Community Development Table in the Needs.xls workbook.

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.
2. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

\*Note: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

Program Year 4 Action Plan Community Development response:

#### Non-Housing Community Development Needs

The non-housing community development needs eligible for assistance with CDBG during the 2008-09 Action Year include public facilities, public improvements public services and economic development. The Community Development Needs Table identifies the following:

<b>Community Development Activity</b>	<b>Needs (5 Year)</b>
Acquisition of Real Property	25
Public Facilities and Improvements	60
Parks, Recreational Facilities	12
Water/Sewer Improvements	29
Street Improvements	8200
Public Services General	30,600
Services to Seniors and Disabled	46,000
Interim Assistance	296
Urban Renewal Completions	10
ED Direct Financial Assistance for For-Profits (CDBG RLF)	Not quantified
ED Technical Assistance (EZ)	10,704
Empowerment Zone Business Services	2
CDBG Non-profit Organization Capacity Building	60
Planned Repayment of Section 108 Debt	5
Supportive Services HOPWA	2800

The Community Development Needs Table, with regard to public facilities and improvements highlight the need for property acquisition and Urban Renewal Close-out activities with regard to the redevelopment of the downtown and JFK redevelopment areas. The needs table identifies 48 acquisitions and 10 completions. Parks, streets and neighborhood improvement projects are

cited in the table that include 12 park improvements, 29 affordable housing lots to be served with water/sewer improvement, 8,200 linear feet of street reconstruction, capacity building for 60 low and moderate income neighborhood to accomplish the completion of 60 neighborhood improvement projects.

Public service needs that are identified in the table include 46,000 services for seniors and the disabled. Transportation services to provide discounted taxi coupons for eligible persons. Graffiti eradication services in low and moderate-income areas to assist with crime prevention and gang activities. Additional public services needs include the provision of 30,000 homeless activities and 2,800 services to persons living with HIV/AIDS.

Economic development needs cited in the Community Development Needs table include the development of a CDBG Revolving Loan Fund (RLF) to provide direct assistance to for-profits. The City has an operating revolving loan fund that was established to assist with the redevelopment of the area damaged by the bombing of the A.P. Murrah Federal Building. The RLF was capitalized by Economic Development Initiative Grant funds. The EDI grants are due to expire and, if necessary, the Murrah District Revitalization Loan Fund program income will be used to capitalize a CDBG RLF to replace the Murrah District RLF. In addition, the needs table highlights economic development needs associated with the Oklahoma City Empowerment Zone and the repayment of Section 108 Loan Guarantee debt.

The following table outlines the Community Development objectives for the 2008-09 Action year by matrix code:

<b>Matrix Code</b>	<b>Program</b>	<b>Objective</b>	<b>Allocation</b>
<b>01 &amp; 02</b>	<b>Acquisition/Disposition of Real Property</b>	<b>5</b>	<b>\$868,500.00</b>
	Urban Renewal Authority	5	\$868,500.00
<b>03E</b>	<b>Public Facilities and Improvements</b>	<b>12</b>	<b>\$112,000.00</b>
	Neighborhood Improvement Projects	12	\$112,000.00
<b>05</b>	<b>Public Services General</b>		<b>\$14,800.00</b>
	Graffiti Eradication	200	\$14,800.00
<b>05A &amp; 05B</b>	<b>Senior &amp; Handicapped Services</b>	<b>9,000</b>	<b>\$52,100.00</b>
	Share-A-Fare	9,000	\$52,100.00
<b>07</b>	<b>Urban Renewal Completions</b>	<b>2</b>	<b>\$0.00</b>
	Urban Renewal Authority	2	\$0.00
<b>18A</b>	<b>ED Direct Financial Assistance for For-Profits</b>	<b>0</b>	<b>\$0.00</b>
	CDBG Revolving Loan Fund	0	\$0.00
<b>18B</b>	<b>ED Technical Assistance</b>	<b>20</b>	<b>\$38,600.00</b>
	CAA Small Business Technical Assistance	20	\$38,600.00
<b>19C</b>	<b>CDBG Non-profit Organization Capacity Building</b>	<b>12</b>	<b>\$69,500.00</b>
	Non-profit Organization Capacity Building	12	\$69,500.00

<b>19F</b>	<b>Planned Repayment of Section 108 Loan Principal</b>	<b>\$1,394,060.43</b>
<b>21A</b>	<b>General Program Administration</b>	<b>\$1,271,140.20</b>
<b>21D</b>	<b>Fair Housing Activities (subject to 20%)</b>	<b>\$82,745.00</b>

**Slum and Blight Activities**

Funds allocated for economic development and redevelopment activities in cleared areas and in the Murrah District Revitalization “bomb damaged” area.

In addition, administrative funds are allocated for the following:

- Monitoring and providing fair housing activities;
- Administration, oversight and planning for authorized activities

**Long and Short Term Housing and Community Development Objectives**

1. Improve the quality and quantity of owner occupied housing, 5-year objective to produce new or rehabilitated housing units:
  - a. Oklahoma City Housing Assistance Program to produce 274 new and rehabilitated housing units over 5-year term (60 units annually), \$1,085,500 CDBG & \$1,000,000 HOME 2008-09 funding
  - b. Community Housing Development Organizations to produce 100 housing units over a 5-year term (20 units in 2008-09) \$424,554.30 CHDO set-aside and \$200,000 CHDO Loan Pool
  - c. Habitat for Humanity short-term 1 to 2-year objective to develop a 29-unit affordable housing subdivision. \$300,000 2007-08 HOME
  - d. Emergency Home Repair program 5-year program to remedy life threatening housing conditions for 500 low/mod income home owners (100 annual) \$579,000 2008-09 CDBG funding
  - e. Down Payment and Closing Cost Assistance Program, 5-year objective to provide down payment and closing cost assistance to 700 low/mod households in the NRSA and targeted areas (150 annual) \$24,215 ADDI, \$600,000 HOME 2008-09 and carry-forward 2007-08 HOME funds
  - f. OKC Abandoned Housing Program, 5-year interim assistance program to eliminate eminent threat to health and safety through securing 1,000 (200 annual) vacant and abandoned residential structures, \$67,600 2008-09 CDBG funds
2. Increase the supply of affordable rental housing, 5-year objective to produce new and rehabilitated rental housing units
  - a. Non-profit/For-profit Housing Pool, 2-year program to produce 69 rental housing units (50-senior units, 2 transitional housing, and 17 new owner units constructed by non-profit housing developers) \$316,683 06/07 funding
  - b. Oklahoma City Housing Authority, 5-year objective to rehabilitate 85 public housing units (17 annual) \$240,000 HOME 06/07 funds
  - c. Support Program for Continuum of Care, 5-year objective to produce 32 housing units to support the City’s Continuum of Care program (8-units annual) \$750,000 2007-08 and \$500,000 2008-09 HOME funds

- d. Multi-family Rental Pilot Program, 1-year objective to rehabilitate 8-units of affordable multi-family housing in targeted or historic neighborhoods. \$741,612.16 2008-09 HOME funds
3. Improve quality/increase quantity of neighborhood facilities for low-income persons, 5-year objective to accomplish the following:
  - a. Play in the Park, 2-year program for improving and purchasing equipment for 12 parks located in low/mod neighborhoods, \$0.00 new CDBG funding in 2007-08 (completed)
  - b. Neighborhood Improvement Projects, 5-year program to assist 60 low/moderate income neighborhood projects (12 annual) 112,900 2008-09 CDBG funds
  - c. Non-profit Organization Capacity Building, 5-year program to provide technical assistance to 60 low/mod neighborhood organizations to increase capacity to implement CDBG eligible improvements (12 annual), \$69,500 2008-09 CDBG funding
  - d. Public Works Street Reconstruction, 2-year program to resurface approximately 8,200 linear feet of low/mod neighborhood streets, \$0.00 new 2008-09 CDBG funds
4. Improve services for low/mod income persons, 5-year objective to provide 46,000 subsidized taxi fare coupons to assist low/mod elderly and disabled persons (9,000 annual) through the Share-A-Fare program carried out by Metro Transit, \$52,100 2008-09 CDBG funds
5. Graffiti Eradication, 5-year public service program to increase crime prevention and awareness through the removal of graffiti at 740 sites (148 annual) \$14,800 2008-09 CDBG funds
6. Increase the number of homeless moving into permanent supportive housing to end chronic homelessness
7. End chronic homelessness, 5-year objective to provide assistance to 30,000 homeless persons (6,000 persons annually) \$232,409 2008-09 ESG funds disbursed through a Request for Proposal process
8. Increase range of housing options and related services for persons with special needs, 5-year objective to assist 2,800 HIV/AIDS patients (560 annually) \$459,000 2008-09 HOPWA funds
9. Improve economic opportunities for low-income persons, 5-year objective to accomplish the following:
  - a. Urban Renewal Authority 5-year objective for the acquisition and disposition of 24 properties (5 annual) and the establishment of 8 development agreements (2 annual) to stimulate job creation and aid in the elimination of slum and blight, \$868,500 2008-09 CDBG funds
  - b. Section 108 Loan Guarantee Repayment, 6-year program to repay Section 108 Loan Guarantees associated with the Oklahoma League for the Blind, Tower Tech, Skirvin Hotel, American Indian Cultural Center and Dell Business Services Center, \$1,394,060.43 2008-09 CDBG funds
  - c. CAA Small Business Assistance Program, 5-year program to assist 100 businesses (20 annual) by providing technical assistance to access Empowerment Zone tax incentives and small business financing services, \$38,600 2008-09 CDBG funds

- d. CDBG Revolving Loan Fund, 3-year objective to improve economic opportunities for persons of low and moderate income by providing project financing to business located in the Murrah Revitalization District subject to close-out of Economic Development Initiative Grant activities. \$0.00 2008-09 CDBG funds

**STATEMENT OF COMMUNITY DEVELOPMENT OBJECTIVES  
CITY OF OKLAHOMA  
COMMUNITY DEVELOPMENT BLOCK GRANT FUNDS**

The primary objective for the use of Community Development Block Grant funds is the development of a healthy and viable urban community, including decent housing and a suitable living environment and expanding economic opportunities, principally for persons of lower and moderate income. Consistent with this primary objective, federal funds will enable community development objectives to effect the following specific objectives in a manner consistent with comprehensive local development planning:

1. The revitalization of neighborhoods through conservation and rehabilitation of the housing stock, suitable code enforcement, public-private partnerships, and provision of opportunities for homeownership in areas inhabited principally by persons of low and moderate income
2. The continuation of public-private partnerships in support of economic development activity that will benefit the downtown area and surrounding neighborhoods inhabited by persons of low and moderate income through the creation or retention of permanent private sector jobs.
3. The promotion of equal opportunity in housing throughout the city and the elimination of barriers to housing for protected groups of people
4. The support of citizen participation in the City's community development process, addressing both the concerns of the city as a whole and the areas inhabited by persons principally of low and moderate income.
5. The provision of resources permitting the effective administration of Community Development Block Grant funds in efforts to achieve the objectives stated herein.
6. The capacity to respond to urgent threats to the health, safety and public welfare of all citizens.
7. The restoration of public facilities inhabited principally by persons of low and moderate income.
8. The promotion of efficient land use through planning, acquisition, relocation, clearance and redevelopment of blighted areas, leading to community economic development and the provisions of economic opportunities for persons of low and moderate income and the provision of safe, sanitary and decent housing for persons principally of low and moderate income.
9. The development of loans using CDBG funds on an interim basis or through the pledge of future funds for Section 108 loans in accordance with the criteria set forth in 24 CFR 570.200
10. Amendment of Neighborhood Revitalization Strategy Area goals and objectives incorporating Empowerment Zone designation goals and objectives (Round III) and revised Enterprise Community goals and objectives, and extending the term of the designation to coincide with the FY 2009 Empowerment Zone and Enterprise Community designations.

11. Section 108 Loan Guarantee Assistance for the:

Skirvin Hotel Project (Completed)  
Oklahoma League for the Blind (Completed)  
Tower Tech Inc.  
120 North Robinson LLC  
Climate Craft Inc.  
American Indian Cultural and Educational Center  
Bank One Building (Gold Dome)  
Revolving Loan Fund  
Dell Computer Corporation

**Antipoverty Strategy**

1. Describe the actions that will take place during the next year to reduce the number of poverty level families.

Program Year 4 Action Plan Antipoverty Strategy response:

The City is expending grant funds and Section 108 Loan Guarantee funds to stimulate economic development activity. The effort is expected to provide several thousand jobs available to lower-income persons.

Additionally, voter support for public projects resulted in the approval of two major public funding programs. One of the programs, MAPS, has been completed and resulted in the development of a ball park, new civic center, renovations of an existing civic center, new library and a river development through an entertainment district, and improvements at fair grounds to attract /recapture major equestrian events. The side benefits is the development of two new hotels, the renovation of an existing hotel of historic significance, new corporate facilities, theaters, restaurants, sports activities, major shows, conversions of buildings to apartments, etc., all of which stimulate the economy and provide jobs available to lower-income persons. Public investment is responsible for causing the location of a computer sales and service center with a potential for thousands of jobs. The second program, MAPS for KIDS provided for the renovation and construction of new schools, and provided short term jobs to meet construction needs.

Housing activity is high, and casual observation shows that many of the trades workers employed are minorities earning good wages.

Telemarketing activity is high in the City, and accounts for additional job creation.

**NON-HOMELESS SPECIAL NEEDS HOUSING**

**Non-homeless Special Needs (91.220 (c) and (e))**

\*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.

2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Program Year 4 Action Plan Specific Objectives response:

The priorities and specific objectives focus on maintaining the ability of this population to continue independent residency.

Services are available to assist person with frailties and infirmities, but these persons may have transportation problems. Funds were allocated to the Metro Transit Department for purchase of Handi-Trans buses that are used for door-to-door service; several buses have been purchased and are in service.

Funds are allocated to fund transportation of elderly and handicapped persons through a Share-a-Fare Program that provides discounted tickets for taxi fares.

Funds are allocated to support selected Low-Income Housing Tax Credit projects and applications.

The City is supporting applications for the development of Section 202 and 811 projects in the community to assist elderly and handicapped individuals and families.

Funds are allocated to programs that help address problems for homeowners with exterior maintenance grants, emergency repairs, and whole house forgivable rehabilitation loans to elderly persons at or below 60% of median income. The programs will assist these persons in maintaining their residency.

Federal grant funds from the City's CDBG entitlement and the HOME entitlement are used to fund the activities outlined. State agencies use their allocated funds to provide services to some of the non-homeless, and private non-profit donations help support the facility operations.

## **Housing Opportunities for People with AIDS**

\*Please also refer to the HOPWA Table in the Needs.xls workbook.

1. Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.
2. Report on the actions taken during the year that addressed the special needs of persons who are not homeless but require supportive housing, and assistance for persons who are homeless.
3. Evaluate the progress in meeting its specific objective of providing affordable housing, including a comparison of actual outputs and outcomes to proposed goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.
4. Report on annual HOPWA output goals for the number of households assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. Include any assessment of client outcomes for achieving housing stability, reduced risks

of homelessness and improved access to care.

5. Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan.
6. Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Consolidated Plan.
7. Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.
8. Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.
9. Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.

Program Year 4 Action Plan HOPWA response:

An organization known as Red Rock Behavioral Health Services (Red Rock) is contracted by the City to conduct HOPWA activities in the Eligible Metropolitan Strategy Area (EMSA) with the City's HOPWA entitlement grant. The EMSA covers a seven county area. The City coordinates with the provider agency and maintains an active liaison in addition to preparing an annual agreement with the selected provider(s).

The number of persons that received housing assistance during the year is 162 including 11 families.

Short-term rent, mortgage and utility payments were made to 93 persons and 54 people received tenant-based rental assistance.

Barriers encountered in service delivery are:

- The reluctance of clients to use supportive services, particularly mental health and/or substance abuse treatment
- The low income levels of clients, less than \$600 a month in most cases, prevents them from making significant improvements in their living situations
- Clients are not responsible and discount the encouragement they receive to follow through on the goals they agreed to.

Recommendations are to continue outreach, education and development of resources in the service area; continue collaboration with programs internal and external to the HOPWA program; continue and promote the use of supportive services available through the HOPWA grant; expand Red Rock's ability to address needs of clients to develop basic independent living skills; expand housing and supportive services to effectively address the needs of homeless families and individuals that are among the chronically homeless.

As stated, one of the major expectations of the community is to convince those reluctant clients to take advantage of services that can only improve their situations by coming to grips with their problems and using the services available to them.

The City's Planning Department staff will monitor the HOPWA program annually

### **Specific HOPWA Objectives**

Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.

Program Year 4 Specific HOPWA Objectives response:

The State funds used to provide services to persons living with HIV/AIDS are the Ryan White Title II, HOPWA funds, Continuum of Care funds, ESG funds, and public and private donations used by various services agencies. Many of the clients are housed and cared for by family, and use services as necessary. The chronic homeless are more inclined to avoid help and treatment, and most probably are steeped in the fear of what may happen to them particularly those with severe mental illness and substance abuse problems. Outreach and referral services will continue to be used to seek out and provide whatever assistance is necessary to those that will accept such assistance. For many, this effort will start when the client is met upon release from institutional facilities.

### **Other Narrative**

Include any Action Plan information that was not covered by a narrative in any other section.