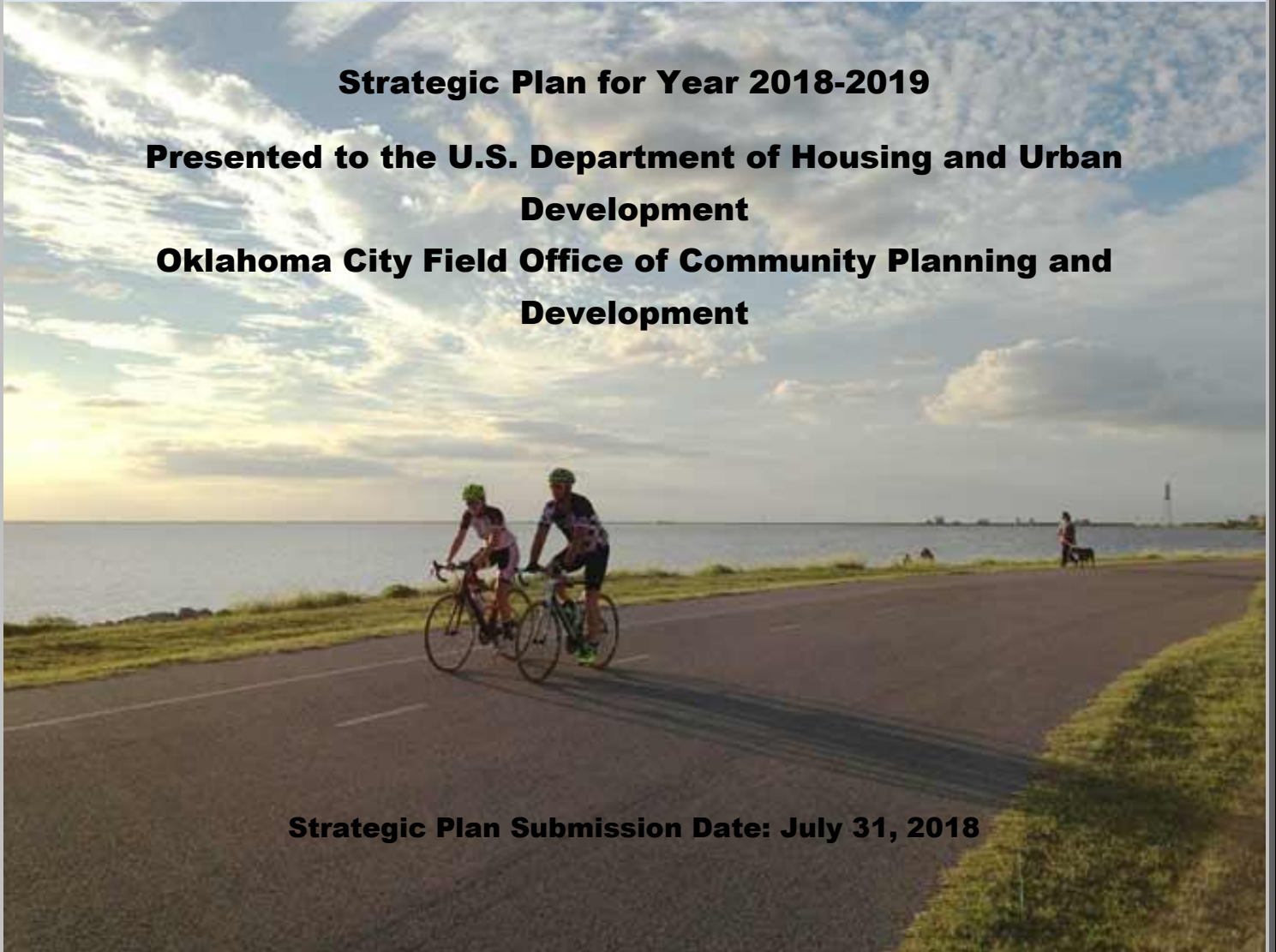


The City of Oklahoma City

2018-2019 Fourth Action Year

Strategic Plan for Year 2018-2019

**Presented to the U.S. Department of Housing and Urban
Development
Oklahoma City Field Office of Community Planning and
Development**



Strategic Plan Submission Date: July 31, 2018



Executive Summary

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

1. Introduction

The City of Oklahoma City (the City) is a federal Entitlement Community under the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant (CDBG) program. In conjunction with CDBG and HOME Investment Partnerships Act (HOME) Programs, the City must prepare a Consolidated Plan every five (5) years for submittal to HUD. The Consolidated Plan provides an updated community-based analysis of demographics, economic, and public policy trends, and a timely reassessment of the needs of low and moderate-income populations relating to housing, shelter, public service, and economic development opportunities. This analysis, along with input received during a comprehensive citizen and stakeholder consultation process, forms the foundation of the City's five (5) year strategic plan for addressing unmet community needs.

Each year of the five (5) year strategy, the City must prepare an annual Action Plan to inform citizens and HUD of planned activities for the program year. Each Action Plan is due to HUD annually by May 15th, unless otherwise extended by HUD. The Action Plan serves as the City's application for CDBG and HOME funds. Regulations governing the CDBG program require that each activity undertaken must meet one of the following three (3) National Objectives: Benefit people with low and moderate incomes, Aid in the prevention or elimination of slums and blight, or Meet an urgent need (such as earthquake, flood, or tornado relief).

The HOME program supports the development of affordable housing, expands capacity of affordable housing developers, and leverages private sector investment. The Housing Opportunities for Persons with HIV/AIDS (HOPWA) program is the only Federal program dedicated to addressing the housing needs of persons living with HIV/AIDS and their families. Grantees partner with nonprofit organizations and housing agencies to provide housing and support to these beneficiaries.

The Emergency Solutions Grant (ESG) program provides funding to: (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters; (4) provide essential services to shelter residents; (5) rapidly re-house homeless individuals and families; and (6) prevent families and individuals from becoming homeless.

The Consolidated Plan details the City's strategy for meeting CDBG National Objectives and HOME program goals, as well as identifying proposed uses for ESG and HOPWA grant funds. Funding provided through HOME, CDBG, ESG, and HOPWA is crucial to the City's ability to meet community needs. The five (5) year Consolidated Plan prioritizes housing as a primary objective, specifically within the

Neighborhood Revitalization Strategy Area (NRSA) and the Strong Neighborhoods Initiative (SNI) neighborhoods where 80% of available grant resources are targeted. Each Annual Action Plan Year, funding recommendations are reviewed and vetted according to the goals and objectives of the Consolidated Plan.

2. Summarize the objectives and outcomes identified in the Plan

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

The City continues to concentrate resources strategically within the SNI neighborhoods to promote a holistic approach to neighborhood revitalization. In the 2018-19 Fourth Action Plan Year, the City of Oklahoma City continues to place emphasis on affordable housing, with specific emphasis on the Neighborhood Revitalization Strategy Area (NRSA).

HOME funding has been allocated for down payment assistance to low to moderate income homebuyers, non-profit housing construction/rehabilitation, and rehabilitation of owner-occupied homes. CDBG funds have been used to support public service activities which continue to be a priority of the community. Funding has been allocated for free and reduced bus and taxi fares for special populations, graffiti removal, securing abandoned houses, after school and park programming, hazardous tree removal, legal assistance, healthcare for homeless and public education. Several public facilities projects were initiated in the prior year and not all will be completed; therefore, funding will be carried forward. No new public facilities projects are identified for funding in the Fourth Action Plan Year, however, funds for public facilities and infrastructure remain allocated for new projects.

The City of Oklahoma City continues to support economic development activities using CDBG funding. CDBG funded activities include small business training; support for the Urban Renewal Authority (to include slum and blight removal, urban renewal completion, and Low-moderate income housing); Section 108 loan fund contingency, and an economic development revolving loan fund to support small businesses within approved commercial district revitalization areas.

ESG funding continues to support a myriad of activities to address chronic homelessness, and HOPWA funds have been allocated to provide Tenant Based Rental Assistance (TBRA) and Short-Term Rental, Mortgage, and Utilities assistance to persons with HIV/AIDS.

A substantial amendment may sometimes be required as the City adapts to changing needs and priorities within an Action Plan year. A substantial amendment to the Consolidated Plan is defined as an amendment that a.) adds a new sub-grantee; b.) transfers funds from one funded activity to another new or existing project, *and* in which an individual line item adjustment results in an increase or decrease of more than 30% to either of the current or newly funded project; or c.) cancels an activity.

3. Evaluation of past performance

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

The 2015-20 Five (5) Year Consolidated Plan includes strategies, with a focus on low and moderate income individuals and families, to provide safe, decent and affordable housing; to end homelessness by moving individuals and families to permanent housing; to provide a safe and suitable living environment with adequate public facilities and services; and, to expand economic opportunities by providing financial resources and technical assistance to businesses with particular focus in the Neighborhood Revitalization Strategy Area (NRSA) and SNI neighborhoods. The City of Oklahoma City has been successful in attaining the goals and objectives in the 2015-20 Consolidated Plan and the First three (3) Action Plan Year strategies.

The activities undertaken addressed the overall program goals and include providing decent housing and a suitable living environment, and expanding economic opportunities principally for persons of low and moderate income. The Consolidated Plan and associated Annual Action Year Plans have addressed **housing goals** by providing funding and engaging in program activities that include support for nonprofit and for-profit housing developers to rehabilitate and construct new affordable housing; support for CHDOs to rehabilitate and construct new affordable housing; support for the Oklahoma City Housing Authority to modernize public housing units; funding to assist with emergency repairs of housing; support for down payment and closing cost assistance to expand homeownership opportunities; funding for activities that support the City's housing rehabilitation program, and housing for persons with HIV/AIDS. Activities undertaken in the 2017-18 Third Action Plan Year addressed these goals and are on target to meet projected outcomes.

The goal of providing a **suitable living environment** was addressed in the first three (3) Action Year Plans by continuing ongoing programs that address specific community needs. The 2017-18 Third Action Plan Year strategy continued support for homeless services through the Emergency Solutions Grant Program; the Continuum of Care Program; discounted taxi coupons for elderly, disabled and sight impaired persons under the City's Share-A-Fare program; bus passes and discounted taxi service for homeless individuals and families; local funding of neighborhood capacity building activities in SNI neighborhoods; CDBG funding to provide neighborhood improvements; activities to address vacant and abandoned housing; removal of graffiti; and, abatement of slum and blight conditions in low-income areas.

The City of Oklahoma City also made progress in attaining its goals for **expanding economic opportunities**. The City's Consolidated Plan and Annual Action Year Strategies support program activities that provide technical assistance to small businesses and investing Section 108 Loan Guarantee funds in businesses to create jobs for low and moderate-income persons.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The principal goal of the Citizen Participation Plan is to provide for and encourage citizen participation, with emphasis on persons of low/moderate income. Funds are targeted in the Neighborhood Revitalization Strategy Area (NRSA) and Strong Neighborhoods Initiative (SNI) Program areas to the greatest extent possible, as the City has placed special emphasis on neighborhood revitalization in these neighborhoods. Objectives are:

1. To provide citizens with reasonable and timely access to local meetings, information, and records relating to the City's proposed use of Federal grant program funds administered by the City, as required by the Secretary of HUD, and relating to the actual use of funds under the Housing and Community Development Act (HCDA), etc., as amended;
2. To provide technical assistance to groups representing persons of low/moderate income in developing proposals for funding opportunities;
3. To provide for public meetings and public hearings to obtain citizen views and to respond to proposals/questions at all stages of the community development process. This includes the identification of needs, development and review of proposed activities, and evaluation of program performance. Hearings are held after adequate notice, at times and locations convenient to potential or actual beneficiaries and with accommodation for minorities and non-English speaking persons, as well as persons with mobility, visual or hearing impairments in all stages of the process;
4. To encourage participation of residents of public and assisted housing developments, and residents of targeted revitalization areas;
5. To consult with, and inform housing agencies about Consolidated Plan activities that may relate to their developments and surrounding communities within their jurisdiction for use in formulating their required housing agency plans;
6. To provide written responses to formal complaints and grievances, within fifteen (15) working days where practicable, and;
7. To publish a synopsis of the draft Consolidated Plan, and provide citizens the opportunity to inspect the full draft document on the City's website or at the City of Oklahoma City Planning Department, Community Development Division-420 W. Main Street, Suite 920, Oklahoma City, OK within a thirty (30) day comment period prior to the final public hearing and adoption of the Consolidated Plan. A record of

public comments received will be maintained and will be submitted with the Consolidated Plan indicating responses to all comments; and

8. To provide a minimum two-week notice of public hearings on the Consolidated Plan and/or the one-year Action Plan proposed for adoption by the governing body. Said notice to the public being accomplished by publication in a city-wide newspaper in the community section.

A summary of community input is attached to this report (Appendix 2). Consultation with outside agencies and other municipalities is discussed in Section PR-10 of the 2015-2020 Consolidated Plan.

5. Summary of public comments

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

The public participation process for completing the 2018-2019 Fourth Action Plan Year began in January 2018 with the publication of a Notice of Public Meetings for two (2) community input sessions held at Sunbeam Family Services facility on January 9, 2018 at 6:00 p.m., and January 11, 2018 at 3:00 p.m. Meetings were held at varying times, with one meeting held during the afternoon to accommodate persons working evening hours. A total of twenty-nine (29) citizens and representatives of local organizations and service providers attended these meetings. Eight (8) Staff members were present at the January 9th meeting and ten (10) were present at the January 11th meeting. Citizen input touched on several topics which are itemized in the attached appendix (Appendix 2). The most common questions related to potential gentrification, regulatory length of affordability periods, opportunities for commercial district small business loans, timeline for expenditures, and clarification of how social services (e.g. HOPWA/ESG/Continuum of Care) are funded in relationship to the Action Plan. Concerns were raised about organizational relationships between some CDBG subrecipients and support was expressed for ongoing support in SNI neighborhoods.

Additional opportunity for community input based on preliminary allocation estimates was provided at the Citizens Committee for Community Development (CCCD) meeting on March 6, 2018, and at the March 13, 2018 meeting of the Neighborhood Conservation Committee (NCC). Final recommendations from Staff following HUD's announcement of formula grant allocations were presented to the CCCD on May 15, 2018 and to the NCC on June 19, 2018. Opportunity for public input was provided at each of these meetings. A thirty (30) day Notice seeking public comment on the proposed Action Plan was published in *The Oklahoman* on June 12, 2018. The City requested and received from HUD, an extension for submission of the Fourth Action Year Plan from July 1 to July 31, 2018. The final public hearing before City Council was held on July 17, 2018. In addition to opportunities provided at public meetings, Staff accepted written correspondence from the public until 5:00 p.m. on July 3, 2018. A final opportunity for input was provided in a public hearing before City Council on July 17, 2018 at the time of final Action Plan approval.

The Oklahoma City Housing Authority, Community Action Agency, YWCA and the Association of Central Oklahoma Governments were consulted by City Staff during the preparation of the Consolidated Plan in 2015 to obtain input about unmet needs, available resources, strategic priorities, and opportunities for collaboration. City Staff met with representatives from the YWCA and the State Attorney General's office to further discuss their concerns about housing for domestic violence victims. Suburban entitlement communities, the State of Oklahoma Department of Commerce and regional planning organizations within the Oklahoma City MSA were provided information about Oklahoma City's first year funding activities and five (5) year priority needs, and encouraged to respond with questions or concerns. One (1) significant response was received from the City of Midwest City proposing greater regional collaboration to address issues related to homelessness. Staff has continued to rely upon feedback obtained during the 2015 Consolidated Plan process and will continue to respond appropriately in this Fourth Action Plan Year as citizens and service providers share concerns about funding allocations and associated needs.

All public comments and Staff's responses are included in the Attached Appendix (Appendix 2).

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

A concern was expressed at the first public participation meeting that the five (5) year minimum affordability period to qualify for a loan under the Down Payment Assistance Program was insufficient. The commenter suggested that requiring a longer affordability period would prevent property flipping and encourage longer term residency, thereby improving neighborhood stability. Staff responded that although an additional five (5) years may require a family to repay part of the debt upon selling their house, or to sell the home to another income qualified family, it would not be practicable to ensure long term residency beyond the minimum affordability period. Staff also noted that the administrative capacity required to monitor compliance for the additional five (5) years would be difficult to maintain.

Requests were also expressed for additional support of public service activities. Although the need is well documented, the CDBG 15% public services cap provides minimal opportunity to increase support for these activities. In addition, subrecipients must demonstrate both financial and organizational capacity to ensure non-dependence on federal funds, as funding in future program years cannot be guaranteed. Although the City of Oklahoma City is sensitive to the need for additional public services support, we were unable to fund multiple new activities. The Healing Hands public service activity to provide healthcare for the homeless was created as a new activity in the Third Action Plan Year and will also receive support in this Fourth Year Action Plan. The City proposed a new allocation for park programming for low- income youth and continues to maintain support for activities funded in prior years. These include the provision of vouchers to the homeless and disabled for bus and taxi fares; graffiti removal; the Science, Technology, Engineering, Arts and Math (STEAM) afterschool programming; and securing abandoned housing.

On a positive note, comments were received about the effectiveness of the SNI program and the desire to see these activities remain fully funded in future years as new neighborhoods are identified and targeted for support. As work has been completed in the Classen's North Highland Park Neighborhood and is wrapping up in the Classen Ten Penn Neighborhood, City Council has approved the Capital View and Capitol Hill neighborhoods for SNI support. Preliminary activities in these neighborhoods will begin in the Fourth Action Plan Year. Work in the Culbertson neighborhood will also continue.

All public feedback was given due consideration, although not every requested activity could be funded. Some comments and suggestions resulted in competing goals and perspectives, requiring either substantial compromise between two worthy alternatives, or rejection of a viewpoint not in conformance with the larger majority. Other suggestions were non-compliant with program regulations and/or strategic goals. The need for greater community investment is apparent; however, resources (both monetarily and administratively) are insufficient at present to enlarge the targeted neighborhood boundaries.

7. Summary

Oklahoma City's strategic mission for community development is to facilitate community revitalization, and to ensure the provision of decent housing, a suitable living environment and expanded economic opportunity for all residents. During the first two Action Plan Years, falling commodities prices, specifically the price of crude, adversely impacted local growth due to the City's disproportionate reliance on the energy industry. Declining oil prices led to substantial corporate layoffs among some of the City's largest employers, and a significant decrease in sales tax revenues at both the state and local levels. Development continued, albeit at a slower pace; however, multiple large-scale project proposals were terminated, scaled back, or postponed indefinitely. During the Third Action Plan Year, sales tax revenues gradually rebounded and the economy shows signs of renewed interest in development. As we enter this Fourth Action Plan Year, oil prices are improving, sales tax revenue is on the incline and we remain optimistic that the economy will continue to improve. However, changes in the presidential administration in 2016, and the subsequent proposals to eliminate the CDBG and HOME programs continue to cause concern about the City's future ability to continue support for affordable housing activities. Land costs have increased as have the cost of labor and materials. As a result, developers are forced to construct higher end units targeted to upper end wage earners, thereby increasing the gap in affordability.

In 2017 a total of 1,544 apartment rental units (including both affordable and market rate) were added in Oklahoma City, a decrease of 54% from the previous year.* The market easily absorbed all 1,544 units, plus an additional 731 units as indicated by the decrease in the vacancy rate. Only 1,230 units are scheduled to be completed in 2018. Approximately 3,000 units are in various stages of planning; however, it is unlikely that all will be developed. It remains to be seen whether the rapid market absorption is the result of negative rates generated by overbuilding during the slow economy, or whether representative of significantly increased demand. The average rent for the entire MSA

increased 2.22% year over year to \$0.92 per square foot. Although rental rates continue to increase, they remain below the 3.46% rent growth experienced in 2016 and the 29-year historical average of 3.02%. Unemployment rates continue to remain extremely low at 3.4%. The demand for moderate to low-income rental housing continues to exceed supply, especially for those in the lowest income brackets. Rising interest rates are expected to adversely affect the eligibility for private mortgages which will make homeownership more difficult for low income and middle class households. Multifamily occupancy rates city-wide are currently averaging 90%, representing a 1.0% increase over 2016. In the Urban Core, there are presently 3,446 units of inventory, of which 91% are occupied. Recently, concessions have begun to appear as a significant number of new units have come online. Concessions should decrease as construction slows and newly developed units reach capacity, and are already showing signs of dissipating.

**All statistics noted in this section have been redacted from the Price Edwards & Company, Oklahoma City 2017 Year-End Multifamily Market Survey, February 2018.*

PR-05 Lead & Responsible Agencies – 91.200(b)

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

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	OKLAHOMA CITY	Planning- Community Development
HOPWA Administrator	OKLAHOMA CITY	Planning- Community Development
HOME Administrator	OKLAHOMA CITY	Planning- Community Development
ESG Administrator	OKLAHOMA CITY	Planning- Community Development

Table 1 – Responsible Agencies

Narrative (optional)

The lead agency for overseeing the development of the Consolidated Plan Fourth Action Year Plan and for administering programs covered by the Plan is the Housing & Community Development Division of the City of Oklahoma City, Planning Department.

Consolidated Plan Public Contact Information

For questions and comments regarding this plan, please contact Chris Varga, Principal Planner, City of Oklahoma City, 420 W. Main Street, Ste. 920, Oklahoma City, OK 73102

AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The lead agency for overseeing the development of the Consolidated Plan and for administering programs covered by the Plan is the Housing & Community Development Division of the City of Oklahoma City Planning Department. The Oklahoma City Continuum of Care (CoC) Committee is comprised of several homeless service providers who provide guidance on allocation and expenditure of ESG and HOPWA funds. Citizen input on allocations and expenditures of federal grant funds is received from the Citizens Committee for Community Development (CCCD) and the Neighborhood Conservation Committee (NCC), a subcommittee of City Council.

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

The City routinely communicates with the Oklahoma City Housing Authority (OCHA) to understand their programs and needs. The City continues to provide them with funding each year to rehabilitate some public housing units as indicated within our Action Plan. The OCHA has housing units in the City's SNI neighborhoods, and we have discussed with them the potential for exterior improvements to help the neighborhood. We have also planted trees on several OCHA properties within the SNI as part of our neighborhood tree planting initiative. Prior discussions have been held with OCHA to consider the possibility of jointly applying for a future Choice Neighborhood Grant. The City is also collaborating with the Oklahoma City Housing Authority about affordable housing needs and priorities.

The City interacts routinely with the Oklahoma Housing Finance Authority (OHFA) as we direct clients to Section 8 programs, coordinate data sharing. In the past City grant funds have provided additional funding to support selected LIHTC projects.

The City collaborates with our Continuum of Care (CoC) subrecipients to provide various types of assisted housing. Some homeless service providers in the CoC specialize in assisting individuals with mental health concerns. Case managers with these organizations receive SSI/SSDI Outreach, Access, and Recovery (SOAR) training and connect eligible clients to appropriate SSI/SSDI benefits. All the community mental health centers in the City collaborate with CoC housing providers and two of the mental health centers are also housing providers.

The City has collaborated with representatives of the Oklahoma Department of Mental Health and Substance Abuse to share information and work more effectively together.

Besides the Continuum of Care Committee, Housing & Community Development Division staff participate in the Coalition to End Poverty, and the Governor's Interagency Council on Homelessness

which serves as a forum for communication with representatives from state agencies, community organizations, and non-profits.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The City of Oklahoma City is the lead agency for the Oklahoma City Continuum of Care. The City has placed an emphasis on housing the chronically homeless using a housing first approach since joining the 100,000 homes campaign in 2013. Since then, over 200 chronically homeless individuals have been housed with a retention rate of over 95%. Housing homeless veterans has also been a program emphasis and the CoC coordinates with the Veteran's Administration for VASH vouchers and case management. Additionally, the City will be collaborating increasingly with Goodwill to provide services to veteran's families as Goodwill is the local provider of the Supportive Services for Veteran's Families grantee.

While the City has permanent housing programs that focus on homeless families, the most extensive services to that population have been provided via the Emergency Solutions Grant through prevention and re-housing assistance. The services that ESG provides are those most often required by homeless families. Most of these families do not have the extensive needs that make supportive housing a necessity. ESG funds are typically the vehicle used to address the needs of those at risk of homelessness. If an individual or family demonstrates that they are at imminent risk of being homeless, ESG agencies can help address the issues leading to that situation and provide case management to avoid loss of housing.

The OKC CoC increasingly focuses on homeless youth. Be The Change, the City's primary outreach provider has, with an ESG grant, operated a youth outreach program for the last three years. In recent years the Homeless Youth Alliance was formed by a group of local non-profit and government organizations focused on addressing the needs of homeless youth. Since then, Be The Change opened the City's first youth drop-in center and this year expanded services and provides some overnight shelter at a facility on S 55th & Shartel. Discussions for potential CDBG funding to support new Oklahoma City youth shelters are on-going.

Planning for the homeless strategies and outcomes begins with the Oklahoma City Coalition to End Poverty. This is a broad-based group of service/housing providers, faith based organizations; volunteer advocates and service recipients. This organization provides insight and feedback on the Plan objectives designed to meet the needs of people who are homeless and/or have special needs; including people with HIV/AIDS. The Coalition works to provide awareness to elected officials, interested parties and the public about homelessness and people with special needs.

In collaboration with City Planning Department staff and the Homeless Alliance, the Coalition organizes and implements the annual Point in Time Count (PIT) of the Homeless population each January. This information is used in the annual HUD Continuum of Care (CoC) competition. The data obtained from the annual count is used to determine need and identify present trends within the homeless population, including the chronically homeless and families with children.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The Continuum of Care Committee (CoC) oversees and evaluates the housing and service programs funded through the CoC, HOPWA, ESG, and City Social Services. The CoC Committee reviews proposals and makes funding recommendations to the City Council's Social Services Committee, which in turn makes recommendations to the City Council.

The geographic area served by ESG is the same as the Oklahoma City Continuum of Care (CoC). ESG funded agencies are considered members of the CoC. All ESG and CoC funded organizations are members of the Coalition to End Poverty and several CoC subrecipients also receive ESG funding and conduct ESG eligible activities. As the CoC lead agency, the City of Oklahoma City Planning Department consults with ESG funded agencies to develop performance standards that serve as a measure for evaluating the outcomes of ESG assisted projects. The lead agency also collaborates with CoC and ESG funded agencies to develop local policies related to other ESG elements such as case management. The CoC Board ranks/determines funding allocations and monitors financial and programmatic elements of both CoC and ESG funded projects. The CoC board provides feedback on strengths and weaknesses and determines if projects should be defunded if performance does not improve by a set deadline.

Homeless Management Information System (HMIS) policies and procedures are developed through the Data Committee of the Coalition to End Poverty. Membership of the data committee is comprised of representatives from the CoC lead agency; the HMIS lead agency, and several CoC and ESG Subrecipient organizations. Policies and procedures are developed to comply with HUD data requirements as well as other federal and local requirements and must meet the data needs of the CoC. HMIS funding is provided by the City of Oklahoma City, through a Continuum of Care program grant, and from several other funding sources. In 2016 the CoC switched from a self-developed HMIS system to Servicepoint which allowed a cost savings of \$77,000 which was used to create a new permanent supportive housing project for chronically homeless individuals. An additional HMIS grant of \$22,000 was subsequently required to offset higher than anticipated Servicepoint costs.

The Oklahoma City Emergency Medical Services Authority (EMSA) contracted with a consultant (Center for Urban Community Services) in 2007 to conduct an area-wide HOPWA Needs Assessment. The Assessment was completed in 2008 and provides the CoC a basis for HOPWA funding decisions. This

study remains relevant in 2017 and has been instrumental in developing an overall strategy that directs funding to those individuals and families with the greatest need. The Continuum of Care lead agency is currently exploring opportunities to determine priorities, gauge progress and develop strategies for addressing the underserved needs of persons and families with HIV/AIDS.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

(Table 2 below)

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Metropolitan Fair Housing Council
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Administration-Fair Housing Enforcement
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City contracts with Metropolitan Fair Housing Council to conduct fair housing activities and investigate housing discrimination complaints. The Metro Fair Housing Council provides periodic reporting on their activities, which is used to tailor strategies for promoting Fair Housing. Metro Fair Housing's Fair Housing complaints data and organizational input were essential to the completion of the 2014 Analysis of Impediments.
2	Agency/Group/Organization	OKLAHOMA CITY HOUSING AUTHORITY
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs Homelessness Needs - Veterans Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	In preparation of the 2015-20 Consolidated Plan, the Oklahoma City Housing Authority was consulted directly by City Staff to gauge current needs for public housing and Section 8 tenants. Information was provided by OCHA about current inventories, waiting lists, capital needs, and veteran's benefits, anticipated funding over the next five (5) years, and anticipated gaps in resources. The City of Oklahoma City continues to provide CDBG funding to support the rehabilitation of ten (10) public housing units in the Fourth Action Plan Year to enhance the quality of public housing.
3	Agency/Group/Organization	Association of Central Oklahoma Governments
	Agency/Group/Organization Type	Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Market Analysis Economic Development

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Oklahoma City continues to partner with the Association of Central Oklahoma Governments (ACOG) in support of economic development activities identified in the regional Comprehensive Economic Development Strategy (CEDS). ACOG serves as the regional Metropolitan Planning Organization (MPO). ACOG reviewed the proposed priority needs for the 2015-20 Consolidated Plan and the First Year Action Plan funding allocations. They remain supportive of the City's recommendations in this Fourth Action Year Plan.
4	Agency/Group/Organization	COMMUNITY ACTION AGENCIES OF OKLAHOMA AND CANADIAN COUNTIES
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Education
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Community Action Agency (CAA) was consulted for the homeless needs assessment and identification of social services gaps during the Consolidated Plan planning process. CAA continued to provide child development services, treatment for substance abuse, and economic development loans for small businesses, homebuyer assistance, and emergency repair/weatherization activities for homeowners in the Third Action Plan Year. CAA was provided with CDBG funding to support emergency home repairs, graffiti removal, and small business services. Accomplishments are regularly reported to the City.

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

The City of Oklahoma City consulted with all relevant agencies and municipalities, and provided an opportunity to comment and provide feedback on Plan priorities through a public meeting process and public comment period.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	The City of Oklahoma City	The Continuum of Care Committee generally adheres to recommendations and priorities identified in the Consolidated Plan, and seeks to ensure a targeted distribution of resources based on need. In the Third Action Plan Year, CoC, HOPWA, ESG and City Social services funding was allocated with oversight by the CoC Committee. This allocation process will remain in place for the Fourth Action Year Plan.
planOKC	The City of Oklahoma City	In 2015, The City of Oklahoma City adopted a new comprehensive plan (planOKC) that informs City planning strategies in the Fourth Action Plan Year and for the foreseeable future. It is anticipated to impact all funding priorities in the remaining years of our Five (5) Year Consolidated Plan.
Comprehensive ED Strategy Central OK	Association of Central OK Governments	The CEDS is a long range regional plan that analyzes the challenges and opportunities related to economic and community development in the Central Oklahoma region. The City of Oklahoma City continues to collaborate with ACOG to achieve economic development objectives and enhance the regional appeal of the metropolitan area to attract new business and industry.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

The City of Oklahoma City maintains an ongoing dialogue with local non-profit and for-profit housing providers and developers to gauge housing needs in the metropolitan area. Solicitations for development proposals are drafted based upon current housing needs and community goals such as mixed income housing, deconcentrating poverty, infill development, and minimal design standards. Housing needs for very low-income families are identified through continuing discourse with the Oklahoma City Housing Authority. In this Fourth Action Year Plan, The City of Oklahoma City consulted the most recent release of the Oklahoma County Housing Needs Assessment prepared by Integra Realty Resources for the Oklahoma Housing Finance Agency in January 2016 and last revised in July 2016. This report provides helpful data, trends, and statistics for the local housing market such as demographics, market supply and demand, vacancies, average rental rates, housing costs, economic conditions and needs of the homeless. Current data and market trends in multifamily and commercial development are monitored through analysis of the Price Edwards & Company, Oklahoma City market studies which are released annually.

Two (2) public meetings were held in January 2018 at the Sunbeam Family Services facility at NW 14th and Classen. Attendance at these meetings by local service providers and neighborhood associations included representatives from Community Action Agency, Classen Ten-Penn Neighborhood Association, Central Oklahoma Transportation and Parking Authority, Jefferson Park Neighborhood Association, Positively Paseo, Neighborhood Housing Services, City Care, Oklahoma City Metro Alliance, and private citizens. Comments and input received during these public meetings are provided in Appendix 2 of this report.

Consultations with area service providers and homeless organizations helped inform the allocation process for ESG and HOPWA funds. Collaboration and discussion with regional planning organizations and local governments in surrounding counties and communities is pursued to promote regional growth, and to identify opportunities and threats that may require increased attention and/or resources. In the Third Action Plan Year, the City continued to seek opportunities for stretching resources such as eliminating duplicative services. Regional approaches to the provision of social services continue to be practiced and encouraged.

Collaborative efforts to promote economic growth are sometimes more difficult to achieve due to the competition for sales tax dollars between local communities. The funding of city services relies heavily on continued increases in sales tax receipts and the City of Oklahoma City often finds itself in direct competition with suburban municipalities for new businesses. In the first three (3) Action Plan Years, a significant decrease in municipal sales tax revenue has only served to exacerbate the problem; however, in recent months sales tax collection has shown a marked improvement.

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

A Notice of Public Meetings was published in *The Oklahoman* on December 22, 2017 soliciting participation and feedback for the 2015-20 Consolidated Plan 2018-19 Fourth Action Year Plan. In addition, local stakeholders, non-profit organizations and other interested parties were notified of the public meetings via email on December 29, 2017. Meetings were held at the Sunbeam Family Services facilities at NW 14th and Classen at 6:00 p.m. on January 9, 2018 and at 3:00 p.m. on January 11, 2018.

The citizen participation process and summary of feedback has been fully described in the Executive Summary, and due to character space restrictions cannot be duplicated here. Feedback received at the public meetings was used in conjunction with quantitative data and current demographics to establish priority needs for this Consolidated Plan Fourth Action Year Plan. Where possible, funding allocations and strategic goals were identified based upon the most urgent community needs. Staff will evaluate needs on an ongoing basis. Funding allocations in each Annual Action Plan will be adjusted as needed to promote a strategic and targeted allocation of resources, with the intent of creating a noticeable and sustainable community benefit.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meetings	<p>Non-targeted/broad community</p> <p>Non-Profit Organizations and Service Providers</p>	<p>Two (2) public meetings were held for public comment and feedback. The session on January 11, 2018 was scheduled at 3:00 p.m. to accommodate citizens working evening hours, and to provide an alternative time for representatives from local non-profits and service providers during normal business hours. Only eleven (11) community members attended the two sessions. Eight (8) City Community Development Staff members were present on January 9th and ten (10) attended the January 11th meeting.</p>	<p>A summary of community feedback is attached in the appendices of this report.</p>	<p>All comments and suggestions were given due consideration in the allocation process, although not all requests could be supported.</p>	
2	Newspaper Ad	<p>Non-targeted/broad community</p>	<p>A Combined Notice of Thirty (30) Day Comment Period and Notice of Public Hearing was submitted to Oklahoma Publishing Company (OPUBCO) for publication on June 8, 2018 and printed on June 12th in the legal notices.</p>	<p>No additional comments were received in response to the published request for public comment about proposed activities.</p>	<p>Not Applicable</p>	

3	Public Meeting	Non-targeted/broad community	<p>In addition to the two (2) public meetings conducted for citizen input, the proposed Fourth Action Year Plan was also presented at public meetings of the Citizens Committee for Community Development on March 6 and May 15, 2018. The Plan as approved by the CCCD was presented at public meetings of the Neighborhood Conservation Committee of City Council on March 13 and June 19, 2018. A final public hearing before City Council was conducted on July 17, 2018.</p>	<p>No additional feedback from the public was received during the public hearings.</p>	<p>Not Applicable</p>	
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Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

Final allocations of funding from the U.S. Department of Housing and Urban Development (HUD) were announced on May 1, 2018. The CDBG allocation of \$4,901,496 represents an 11.83% increase from FY 2017. The HOME program received a significant increase of \$715,400 over last year's funding, which will allow greater support of The City's Down Payment Assistance, Whole House Rehab and Affordable Housing Development Programs. ESG funding remained relatively stable with a 0.39% increase. HOPWA assistance for persons with HIV/AIDS increased by \$82,359 (13.28%).

In addition to entitlement funds, The City was awarded from the Oklahoma Department of Commerce \$33.5 million CDBG-DR funding for disaster recovery unmet needs in the First Action Year Plan. Activities for the CDBG-DR funds began during the Second Action Year Plan and were completed in the Third Action Plan Year.

HUD released an interim rule for a National Housing Trust Fund (HTF) on January 30, 2015. These funds are presently administered by the State under a structure similar to Low Income Housing Tax Credits (LIHTC). The City of Oklahoma City may pursue HTF funding as a subrecipient through the State if a unique opportunity arises to increase affordable housing production through this resource.

The City of Oklahoma City was approved for Section 108 funding during the First Action Year Plan to assist the 21C Museum Hotel in the historic Film Row District. These funds supported development of a 135-room boutique hotel, restaurant and museum. The project is completed and fully operational, and includes lodging, retail, and restaurant activities. The catalytic value of this project is being realized through the development of significant residential and retail construction now underway on adjoining streets. Staff is presently reviewing a request for a potential Section 108 loan to support redevelopment of the historic First National Center; however, the timing of that support is unknown. If this, or additional opportunities materialize in the FY 2018-19 Fourth Action Plan year, Section 108 Loan Guarantee applications may be submitted to further the City's ongoing economic development initiatives.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	4,901,496	228,307	2,797	5,132,600	4,901,496	<p>Prior year resources include 2017 unprogrammed/ recaptured program funds in the amount of \$2,797.41. Program income includes carry forward from 2017-18 in the amount of \$153,306.70, and estimated 2018-19 PI in the amount of \$75,000 for total PI of \$228,306.70. Future allocations assume flat funding over the five (5) year life of the Plan. In addition to the \$5,132,600 allocated in the Fourth Action Year Plan, there is a carry forward of \$2,930,127.18 for total 2018-19 CDBG funding in the amount of \$8,062,727.29</p>

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	2,482,884	122,000	8,683	2,613,567	2,482,884	Prior year resources include unallocated 2017-18 program funds, and recaptured program funds. Future allocations assume flat funding over the five (5) year plan period. In addition to the \$2,613,567.44 HOME funds allocated in the Fourth Action Year Plan, there remains a carry forward balance of \$2,784,580.20 for total funding of \$5,398,147.64
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	702,611	0	0	702,611	702,611	Future allocations assume flat funding from year to year

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	394,555	0	0	394,555	394,555	Future allocations assume flat funding from year to year

Table 5 - Expected Resources – Priority Table

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

The City of Oklahoma City prioritizes activities that leverage federal funds with other public and private resources to address housing needs in the community.

The City has a CHDO set-aside that includes the 15% CHDO statutory minimum and a pool of HOME funds loaned to Community Housing Development Organizations for new home construction and rehabilitation/sale activities. CHDOs are encouraged to utilize private bank financing along with the CHDO loan pool of HOME funds in providing affordable housing. Proposals for new projects are generally accepted when the CHDO has completed all previously funded projects. When available, The City facilitates the transfer at no cost, of Oklahoma County owned vacant lots to nonprofit organizations for the construction of affordable housing. The lots are provided to the City through an agreement with Oklahoma County, and the primary lot recipients are CHDO’s. The new home construction is funded with CHDO proceeds. Homebuyers obtain private financing through local lenders and other resources. When resources allow, the City also provides local funding (general funds) to agencies that provide services to the homeless.

Federal funds provided by HUD are utilized in several ways to leverage public and private resources. The City’s down payment and closing cost assistance program assists in the achievement of home ownership, and has proven to be an attractive program that stimulates significant interest among

private lenders. During the 2016-2017 CAPER reporting period, the City leveraged its Down Payment Assistance program funds with private financial institution mortgage investments totaling \$2,912,062. Similar leverage can be anticipated annually in future program years. The City may also assist developers providing HOME funds for Low Income Housing Tax Credit (LIHTC) applications to the Oklahoma Housing Finance Agency (OHFA) when reasonable to do so, and may also assist the recipients of Housing Trust Fund (HTF) funding. OHFA has in the past provided bonus points for applications that receive a minimum level of funding granted to the project from the local community. LIHTC credits provide significant leverage in affordable housing developments.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The Oklahoma City Urban Renewal Authority (OCURA) still owns much property in the central and northeast area of the city, and has a goal to develop some of their sites with mixed-income housing projects. Beyond this, OCURA will continue the redevelopment of closeout areas under the agreements with HUD through eligible program activities that include acquisition, disposition, relocation, clearance and urban renewal completion. HUD designated Urban Renewal areas include Medical Center R-20, Central Business District 1A R-30, and John F. Kennedy R-35. In addition, OCURA will redevelop locally designated low and moderate income urban renewal areas that include Harrison Walnut, Cultural District, North Downtown, and the Northeast Renaissance area.

The City previously owned thirty-six (36) residential lots on the north side of Northwest 10th Street between Ellison Avenue to the east, and Blackwelder Avenue to the west. These lots were offered in a Request for Proposals (RFP) released on March 25, 2015 to solicit project proposals for residential, commercial and/or mixed-use development on these sites. The City completed negotiations with a local builder to develop a mixed income housing and retail on these lots, and the property has been conveyed. Ground was broken in January 2018. It is anticipated that first phase of redevelopment of these parcels will be completed within the Fourth Action Plan Year. A second phase is expected to begin upon lease up and occupancy of the current phase and is schedule to be completed in the Fifth and final Action Plan Year. It is envisioned additional City-owned lots between Blackwelder Avenue to the east and Virginia Avenue to the west will be offered in a similar RFP following completion of the current project.

Discussion

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Whole-House Rehabilitation-HOME	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Quality of Affordable Owner Housing	HOME: \$1,722,374	Rental units rehabilitated: 27 Household Housing Unit
2	Exterior Maintenance and Storm Shelters-CDBG	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Quality of Affordable Owner Housing	CDBG: \$1,184,000	Homeowner Housing Rehabilitated: 45 Household Housing Unit
3	Emergency Repairs-CDBG	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Quality of Affordable Owner Housing	CDBG: \$687,242	Homeowner Housing Rehabilitated:90 Household Housing Unit
4	Downpayment and Closing Costs Assistance-HOME	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Affordability of Owner-Occupied Housing	HOME: \$762,786	Homeowner Housing Added: 33 Household Housing Unit
5	CHDO New Construction/Rehab-HOME	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA	Supply of Affordable Owner-Occupied Housing	HOME: \$1,806,201	Homeowner Housing Added: 8 Household Housing Unit
6	Multi-Family Rehab-CDBG	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA	Supply of Affordable Rental Housing	CDBG: \$0	Rental units rehabilitated: 0 Household Housing Unit
7	Rehabilitation of Public Housing Units-CDBG	2015	2020	Public Housing		Quality of Public Housing	CDBG: \$234,897	Rental units rehabilitated: 10 Household Housing Unit
8	Affordable Housing-AHDP and RHP- CDBG and HOME	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA	Supply of Affordable Owner-Occupied Housing	CDBG: \$0 HOME: \$678,318	Homeowner Housing Added: 9 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9	Public Facilities, Srvc, Infrastructure-SNI CDBG	2015	2020	Non-Housing Community Development	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Quality of Affordable Owner Housing Public Facilities, Services and Infrastructure	CDBG: \$856,718	Public service activities other than Low/Moderate Income Housing Benefit: 3,718 Persons Assisted
10	Neighborhood Capacity- CDBG	2015	2020	Non-Housing Community Development	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Strengthen Neighborhood Capacity	CDBG: \$1	Other: 0 Other
11	Special Needs Transportation Services-CDBG	2015	2020	Non-Housing Community Development		Transportation Options -Special Needs Population	CDBG: \$102,842	Public service activities other than Low/Moderate Income Housing Benefit: 15,350 Persons Assisted
12	Graffiti Removal- CDBG	2015	2020	Non-Housing Community Development		Public Services- Graffiti Removal	CDBG: \$15,011	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 450 Persons Assisted
13	Secure Vacant and Abandoned Properties- CDBG	2015	2020	Non-Housing Community Development		Address Slum and Blight- Vacant Abandoned Buildings	CDBG: \$68,562	Public Service Activities other than Low/Moderate Income Housing Benefit: 100 Households Assisted
14	Small Business Technical Assistance- CDBG	2015	2020	Non-Housing Community Development		Economic Opportunities for Low and Moderate Income	CDBG: \$39,149	Businesses assisted: 125 Businesses Assisted
15	Small Business Revolving Loan Fund- CDBG	2015	2020	Non-Housing Community Development		Economic Opportunities for Low and Moderate Income	CDBG: \$300,000	Businesses assisted: 2 Businesses Assisted
16	Section 108 Loan Assistance- CDBG	2015	2020	Non-Housing Community Development		Economic Opportunities for Low and Moderate Income	CDBG: \$350,000	Jobs created/retained: 0 Jobs
17	Empowerment Zone Staffing- CDBG	2015	2020	Non-Housing Community Development		Economic Opportunities for Low and Moderate Income	CDBG: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
18	Urban Renewal Title Transfer and Disposition- CDBG	2015	2020	Non-Housing Community Development	NEIGHBORHOOD STRATEGY AREA	Supply of Affordable Owner Occupied Housing	CDBG: \$46,625	Homeowner Housing Added: 1
19	Aid Blighted, Vacant, Underutilized Property-CDBG	2015	2020	Non-Housing Community Development		Acquisition/Clearance of Vacant, Blighted Property	CDBG: \$809,386	Other: 1 Other
20	Sustainability-Social Services Provider Facilities	2015	2017	Non-Housing Community Development		Public Facilities, Services and Infrastructure Sustainability Service Provider Facilities-CDBG	CDBG: \$2,197,995	Public service activities other than Low/Moderate Income Housing Benefit: 13 Persons Assisted Other: 3 Other
21	STRMU for Persons with HIV/AIDS- HOPWA	2015	2020	Non-Homeless Special Needs		Housing Availability- Persons With HIV/AIDS	HOPWA: \$351,305	Housing for People with HIV/AIDS added: 115 Household Housing Unit
22	TBRA for Persons with HIV/AIDS- HOPWA	2015	2020	Non-Homeless Special Needs		Housing Availability- Persons With HIV/AIDS	HOPWA: \$351,305	Housing for People with HIV/AIDS added: 30 Household Housing Unit
23	Housing for the Chronically Homeless- ESG	2015	2020	Homeless		Supportive Housing for the Chronically Homeless	ESG: \$394,559	Rapid Rehousing: 80 Households Assisted Overnight/Emergency shelter/Transitional Housing Beds added: 600 Beds Homelessness Prevention: 200 Persons Assisted Other: 1500 Other
24	Administration	2015	2020	Administration		Administration	CDBG: \$995,299 HOME: \$428,229	Other: 0 Other

Table 6 – Goals Summary

Goal Descriptions.

1	Goal Name	Whole-House Rehabilitation-HOME
	Goal Description	Provide HOME financial assistance for the whole-house rehabilitation of a minimum of twenty-seven (27) owner-occupied housing units for income qualified families, seven (7) of which will be in the SNI strategy area. HOME funding \$1,110,341.85 allocated to OKC HAP Whole House Rehab Program, with a goal to target 40% of funding in SNI neighborhoods. \$237.99 allocated in prior years for acquisition rehabs by Paseo Housing will be carried forward. Total funding for these activities is \$1,722,611.
2	Goal Name	Exterior Maintenance and Storm Shelters-CDBG
	Goal Description	Provide CDBG funding in the amount of \$1,184,000 for the remediation of exterior maintenance code violations on a minimum of forty-five (45) owner-occupied housing units for income qualified families.
3	Goal Name	Emergency Repairs-CDBG
	Goal Description	Provide CDBG funding in the amount of \$687,242 for emergency repairs provided to a minimum of one hundred (100) owner-occupied housing units for income qualified families to address immediate threats to life, health and safety.
4	Goal Name	Downpayment and Closing Costs Assistance-HOME
	Goal Description	Provide HOME funding in the amount of \$500,000 for down payment and closing costs assistance for a minimum of thirty-three (33) households, with an 80% spending goal within the DPA Program targeted area (see Appendix 5). In addition, funds from FY 2017-18 in the amount of \$262,786.74 will be carried forward for a total allocation of \$762,786.74.
5	Goal Name	CHDO New Construction/Rehab- HOME
	Goal Description	Provide new HOME funding in the amount of \$372,432.60 for new construction or rehabilitation of at least eight (8) housing units for income qualified families through Community Housing Development Organizations (CHDOs). In addition, new funding in the amount of \$80,000 is allocated to the CHDO Loan Pool. funding is carried forward from prior year allocations to the CHDO loan pool (Jefferson Park, NHS, Paseo and unallocated funds totaling \$718,831.78) and from set-aside balances awarded in 2013 thru 2017 (totaling \$634,936.59). Total CHDO funding is \$1,806,200.97.
6	Goal Name	Multi-Family Rehab- CDBG
	Goal Description	CDBG funding was provided in prior years for the rehabilitation of five (5) multifamily rental units at The Winds House which will be completed during the Fourth Action Plan Year. No additional funding has been allocated.

7	Goal Name	Rehabilitation of Public Housing Units- CDBG
	Goal Description	Provide CDBG funding in the amount of \$234,897 to the Oklahoma City Housing Authority for the rehabilitation of a minimum of ten (10) public housing units.
8	Goal Name	Affordable Housing-AHDP and RHP- CDBG and HOME
	Goal Description	<p>Provided HOME funding in prior years to increase the supply of affordable housing by three (3) units in the Mitchford Development using the Affordable Housing Development Program. \$98,679.80 has been carried forward. The project was delayed and subsequently transferred to OCURA; Four (4) completions have been reported to date for the Third Action Plan Year. New funding in the amount of \$298,304.59 in HOME funds is allocated to the Affordable Housing Development Program in the Fourth Action Year Plan for future projects. \$300,000 was provided in prior years to support the First Step Men’s SRO facility, of which \$262,275.33 has been carried forward. Nine (9) SRO units will be completed during the Fourth Action Plan Year. \$19,059.22 in prior year funding remains unallocated and has been carried forward. Total HOME funding for AHDP and RHP in the Fourth Action Plan Year is \$678,318.94.</p> <p>\$115,000 in CDBG funds was provided in prior years to support the reconstruction of a single-family residence in Jefferson Park for a low to moderate income homeowner. This amount has been carried forward to the Fourth Action Plan Year.</p>
9	Goal Name	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Goal Description	Provide CDBG Funding in the amount of \$856,718.11 to assist in public services and public facilities activities in the SNI neighborhoods, to include tree planting, hazardous tree removal, sidewalks, legal assistance, park improvements, public education, and after school programming. Households assisted estimated at 3,718 including area benefit activities.
10	Goal Name	Neighborhood Capacity- CDBG
	Goal Description	A \$50,000 allocation provided to support a public infrastructure project in the Midtown neighborhood in prior years has been expended and new sign kiosks are installed. Activity has recently been completed and a small balance of \$1,266.41 has been recaptured and made available for FY 2018-19.
11	Goal Name	Special Needs Transportation Services-CDBG
	Goal Description	Expand transportation options using \$102,842.00 in CDBG funds for homeless individuals and persons with special needs to improve accessibility, and to improve quality of life. An estimated 15,350 subsidized taxi fares and bus coupons will be provided to approximately 3,100 homeless persons, seniors, and people with disabilities.

12	Goal Name	Graffiti Removal-CDBG
	Goal Description	Provide CDBG funding in the amount of \$15,011.00 to eliminate graffiti at a minimum of four hundred fifty (450) locations in low and moderate income neighborhoods.
13	Goal Name	Secure Vacant and Abandoned Properties- CDBG
	Goal Description	Provide CDBG funding in the amount of \$68,562.00 for interim assistance to secure a minimum of 100 vacant and abandoned properties to address slum and blight on a spot basis.
14	Goal Name	Small Business Technical Assistance- CDBG
	Goal Description	Provide CDBG funding in the amount of \$39,149.00 to support Technical Assistance (TA) for a minimum of one hundred twenty-five (125) small businesses.
15	Goal Name	Small Business Revolving Loan Fund- CDBG
	Goal Description	Provide CDBG economic development revolving loan fund (RLF) assistance to create jobs and expand commercial services for a minimum of two (2) businesses and microenterprises annually. Loan fund was capitalized in Spring 2015 with \$750,000 in prior year CDBG funds. Due to slow spending, an Amendment was submitted and approved by HUD in the Third Action Plan Year, reallocating most of these funds to other programs. \$300,000 has been carried forward to the Fourth Action Plan Year, of which \$35,000 has been approved to Confections LLC. Recipient has begun drawing funds.
16	Goal Name	Section 108 Loan Assistance- CDBG
	Goal Description	Apply for Section 108 loan program funds to provide Special Economic Assistance for the creation of jobs. The \$350,000.00 "funding" allocation noted below is the annual debt service on outstanding loans and not direct assistance to a specific project. These funds would only be expended in the event of a loan default. It is not anticipated that jobs will be created during the Fourth Action Plan Year.
17	Goal Name	Empowerment Zone Staffing- CDBG
	Goal Description	The City will promote and continue to provide staff for the ongoing implementation of the Empowerment Zone (EZ) designation, if the program is extended or re-established beyond the December 31, 2017 expiration. No funding has been allocated to this activity pending confirmation of extension.
18	Goal Name	Urban Renewal Title Transfer and Disposition- CDBG
	Goal Description	Programmatic support for OCURA Affordable housing development, Low mod activities, slum and blight clearance, and/or Acquisition/remediation. \$46,625.00 has been carried forward from prior program years. No new funding is proposed for this activity during the Fourth Action Plan Year.

19	Goal Name	Aid Blighted, Vacant, Underutilized Property-CDBG
	Goal Description	CDBG Funding in the amount of \$788,880 and authorized carry-over funding and program income of \$20,506.71 to OCURA as a Subrecipient to support CDBG eligible activities that principally include but are not limited to real property acquisition, clearance and demolition, cleanup of contaminated sites, public facilities and improvements, and housing for the benefit of low to moderate individuals or low-mod income areas. Total Fourth Year Action Plan Funding is \$809,386.71.
20	Goal Name	Sustainability-Social Services Provider Facilities
	Goal Description	Support for the Community Development Program to assist non-profit service providers with infrastructure and/or rehabilitation of facilities. \$1,110,864.61 has been carried forward from the prior Action Plan years. A new allocation of \$60,000 is approved for the Fourth Action Plan Year for Healing Hands Homeless services, and \$40,000 is allocated to a TBD Parks Summer Project (public services). Previously funded projects in various stages of completion include the Kiwanis Head Start facility, Metro Better Living Center, First Step Men’s SRO (utilities, and public facility site improvements), Healing Hands (public services), SNI Sidewalks and public art-Red Andrews Park. An estimated \$1.1 million remains in contingency to support future projects. Total activity funding for this line item in FY 2018-19 is \$2,197,995.47.
21	Goal Name	STRMU for Persons with HIV/AIDS- HOPWA
	Goal Description	Provide Short Term Rent Mortgage and Utility (STRMU) assistance using HOPWA funding in the amount of \$351,305 to an estimated one hundred fifteen (115) persons with HIV/AIDS.
22	Goal Name	TBRA for Persons with HIV/AIDS- HOPWA
	Goal Description	Provide Short Term Tenant Based Rental Assistance (TBRA) using HOPWA funding in the amount of \$351,306 to an estimated thirty (30) persons with HIV/AIDS.
23	Goal Name	Housing for the Chronically Homeless- ESG
	Goal Description	ESG funds in the amount of \$394,559 will be used to provide housing and case management resources for approximately fifty (50) chronically homeless, families and veterans. Legal services will be provided to approximately one hundred fifty (150) individuals and families to reduce evictions. Shelter and outreach services will be provided to approximately six-hundred (600) homeless youth and seniors, victims of domestic violence, and individuals with mental illness. Approximately eighty (80) homeless households with children will receive rapid re-housing and prevention services. An estimated 1,500 low income and homeless individuals will access health care services.

24	Goal Name	Administration
	Goal Description	Provide administrative and management support for federal CDBG in the amount of \$995,299 and HOME programs in the amount of \$252,488.40. CDBG includes Administrative support \$852,554, Planning support \$60,000, and Fair Housing Complaint processing \$82,745.00.

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

It is estimated that **464** households will be assisted in obtaining or retaining affordable housing. This includes the following:

- **27** whole house rehabs
- **15** public housing unit rehabs
- **1** housing unit reconstructed
- **13** multifamily unit rehabs
- **1** Acquisition Rehabs (HOP)
- **45** exterior maintenance repairs
- **90** emergency home repairs
- **33** recipients of down payment assistance
- **8** CHDO homes
- **1** non-profit homes constructed
- **5** single family homes for sale to low-income households
- **115** STRMU recipients
- **30** TBRA recipients
- **80** recipients of rapid re-housing services

Projects

AP-35 Projects – 91.220(d)

Introduction

The following initiatives and goals for the Fourth Action Year Plan are consistent with those established in the Five-Year Consolidated Plan with an effective date of July 1, 2018, and are compatible with the purposes set forth in **24 CFR Section 91.1**, that include:

- Affordable Housing Programs consisting of housing rehabilitation and new construction that focus on home ownership, programs to assist lower-income persons to attain home ownership; single and multi-family rental rehabilitation and new construction program activities; Economic Development activities targeting the low and moderate-income areas, and the Neighborhood Revitalization Strategy Area. Neighborhood improvement projects in low and moderate-income

areas, Strong Neighborhoods Initiative areas, and the Neighborhood Revitalization Strategy Area. 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. Public facilities and services to assist special needs populations and persons with disabilities, including, but not limited to the elderly, senior citizens, chronically homeless individuals and families, sight-impaired persons, persons in drug and alcohol recovery, and persons diagnosed with permanent physical and mental disabilities.

The goals and objectives that are addressed in this Fourth Action Year Plan specifically relate to the goals outlined in the 2015-2020 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 program activities are outlined below in Section AP-38 as they relate to availability/accessibility, affordability, and sustainability through the provision of decent housing, a suitable living environment and/or economic opportunity.

Oklahoma City’s formula grant funding allocations, recommended for adoption the Fourth Action Year Plan (fiscal year July 1, 2018 through June 30, 2019), follow the priorities established in the five-year Consolidated Plan that expires June 30, 2020. The Fourth Annual Action Year Plan strategy contains specific funding recommendations to implement the goals established in the five-year Plan tables to the greatest extent possible, depending on federal funding allocations awarded to Oklahoma City.

The funding recommendations for the 2018-2019 Fourth Action Year Plan were considered by the Citizen’s Committee for Community Development on May 15, 2018, and received their favorable recommendation. The funding recommendations were next considered by the Neighborhood Conservation Committee on June 5, 2018, and received their favorable recommendation. Final Plan approval was granted by the City Council on June 19, 2018.

Projects

#	Project Name
1	Down Payment Assistance Program
2	OKC Housing Assistance Program-Whole House Rehab
3	SNI Non-Profit Housing Construction
4	AHDP- Mitchford -OCURA-First Step SRO and Future TBD Projects
5	CHDO Set-Aside Activities: Loan Pool and New Construction
6	STEAM Academy- E. Fields Elementary School
7	Oklahoma City Housing Authority-Public Housing Rehabs

#	Project Name
8	CAA Emergency Home Repair Program
9	OCURA Affordable Housing Development
10	Housing Exterior Maintenance
11	Public Services- SNI Hazardous Tree Removal
12	Public Services- SNI After School Programs
13	Public Services- SNI Legal Assistance to Homeowners
14	Public Facilities- SNI Neighborhood-led Projects
15	Public Facilities- SNI Tree Planting
16	Public Facilities- SNI Sidewalks Phase II
17	Public Facilities- SNI Park Improvements
18	Rehab: Storm Shelters-SNI
19	Public Services- COTPA (Embarck) Share-a-Fare Program
20	Public Services-CAA Graffiti Removal
21	Public Services-OKC Abandoned Housing
22	Midtown Neighborhood Improvement Project
23	Community Dev Program- Public Facilities/Infrastructure-CDBG
24	CAA Small Business Services
25	HUD Section 108 Loan Repayment
26	Urban Renewal Authority-Economic Opportunity
27	CDBG Commercial District Economic Development RLF
28	Empowerment Zone Staff Support
29	Administration-Metro Fair Housing Council
30	Administration-Planning
31	Administration- CDBG and HOME
32	ESG Activities
33	HOPWA Activities
34	Housing Reconstruction-CDBG

Table 7 - Project Information

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

Basis for Category Priority

Priority is assigned to housing objectives based on the amount of federal funds available, unmet needs identified in the preceding analysis as they relate to creating affordable owner housing and encouraging home ownership, and to identify long term solutions. Housing objectives that receive a ranking of high are the objectives that will be addressed through program activities funded in the Annual Action Year programs. Other housing criteria evaluated to provide a ranking of high priority include:

1. Preservation of existing housing stock, particularly in the Neighborhood Revitalization Strategy Area where the greatest concentration of lower-income persons and minorities reside. Funding is allocated to fund rehabilitation of private homes, provide for emergency home repair, exterior maintenance repair, and rehabilitation of public housing units.
2. Permanent housing for the chronic homeless that includes persons with serious mental illness, substance abuse, and other disabilities. Funds can be allocated to match other grant in aid programs, or to accumulate sufficient funds to start a sponsored permanent homeless housing projects.
3. Emergency shelter and the provision of social services to homeless persons, families, and special needs populations is a high priority. All Emergency Solutions Grant funds are allocated to provide shelters with operating funds and services to care for this special population.
4. Down payment and closing cost assistance to increase the affordability of home ownership.
5. Increasing the supply of affordable housing is a high priority. Community Housing Development Organizations (CHDOs) and other developers are eligible to apply for allocations of HOME funds to construct new homes, or purchase/rehab homes for eligible owner households.
6. Objectives that improve the quality of owner housing have a high priority including emergency home repair, housing exterior maintenance and whole house rehabilitation.
7. Objectives that improve the quality of public housing have high priority.

Obstacles to Meeting Underserved Needs

Local and federal resources are insufficient to address all community needs, even those of high priority. In some instances, there are perceptions in the community that affordable housing will decrease area property values and facilitate other societal problems (NIMBY issues). Job creation and economic development are highly dependent on the oil and gas industry which maintains a disproportional presence in the local economy. As the price of oil increases and decreases, uneven development patterns tend to occur. Inadequate educational funding from the State of Oklahoma in recent years has adversely impacted neighborhoods and remains a barrier to the recruitment of new businesses. Likewise, state funding for mental health services remains well below the national average, creating a vast need of social services resources. The regulatory public service cap on CDBG funds limits the City's ability to support these types of activities.

AP-38 Project Summary
Project Summary Information

1	Project Name	Down Payment Assistance Program
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Downpayment and Closing Costs Assistance-HOME
	Needs Addressed	Affordability of Owner-Occupied Housing
	Funding	HOME: \$762,786
	Description	Provide HOME funds for down payment and closing costs assistance up to \$15,000 for low and moderate-income homebuyers with 80% spending goal within the SNI neighborhoods and the NRSA. If unable to timely meet this goal, DPA funding may be spent in non-targeted areas. Funding above includes \$262,786.74 funding from prior years and \$500,000.00 in 2018-19 funding.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	An estimated twenty-three (30) households will be provided down payment and closing costs assistance for homes within targeted neighborhoods and ten (10) homes will be assisted in non-targeted neighborhoods.
	Location Description	Funding is restricted to the Program boundaries with priority given to SNI and NRSA neighborhoods.
	Planned Activities	Down Payment and closing costs assistance to low and moderate-income homebuyers.
2	Project Name	OKC Housing Assistance Program-Whole House Rehab
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Whole-House Rehabilitation-HOME
	Needs Addressed	Quality of Affordable Owner Housing
	Funding	HOME: \$1,722,612
	Description	Provide HOME financial assistance for the whole-house rehabilitation of owner-occupied housing units. Funding above includes \$612,032.15 carry forward from the OKC Housing Assistance Program prior years allocation, and \$1,110,341.85 in 2018-19 funding. 40% of funds will be targeted to SNI neighborhoods. Total also includes \$237.99 carry forward for the Paseo Non-Profit housing activity funded in prior years but not yet fully expended.

	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	An estimated twenty (20) low income homeowners will be assisted with whole house rehabilitation, and a minimum of seven (7) additional homes within the SNI neighborhoods
	Location Description	City-wide, with priority placed on properties within the SNI and NRSA neighborhoods.
	Planned Activities	Whole House Rehabilitations
3	Project Name	SNI Non-Profit Housing Construction
	Target Area	Strong Neighborhoods Initiative
	Goals Supported	Affordable Housing-AHDP and RHP- CDBG and HOME
	Needs Addressed	Supply of Affordable Owner-Occupied Housing
	Funding	\$238
	Description	HOME funding in the amount of \$125,237.99 was provided to support new construction of one (1) home ownership unit in SNI Neighborhoods. The remaining funding for this project of \$238 is carried forward from prior years. No new allocation in 2018-19.
	Target Date	9/30/2018
	Estimate the number and type of families that will benefit from the proposed activities	One low income households will achieve homeownership from the proposed activity within the SNI neighborhoods.
	Location Description	Unit is located at 121 NE 15th Street
Planned Activities	One (1) new unit will be constructed on a single lot.	
4	Project Name	AHDP- Mitchford -OCURA, First Step SRO Project and Future TBD Projects
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Affordable Housing-AHDP and RHP- CDBG and HOME
	Needs Addressed	Supply of Affordable Housing - AHDP and RHP
	Funding	HOME: \$678,319

	Description	Prior year HOME funding was provided to support the construction of new single family homes for sale to low and moderate-income buyers in the SNI neighborhoods and the First Step men's SRO project. \$98,679.80 balance for the Mitchford/OCURA project is carried forward and \$262,275.33 balance for the Frist Step project is carried forward. An unallocated balance of \$19,059.22 is also carried forward. Total carry forward, in 2018-19 is \$380,014.35. An additional \$298,304.59 in new HOME funding is committed in 2018-19 for TBD project(s) to be identified through an RFP process. Total funding, including carry forward is \$678,318.94.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Three (3) to four (4) low income households in the OCURA (previously Mitchford) development are expected to achieve homeownership within the SNI target area during the Fourth Action Plan Year. Nine (9) SRO units are expected to be completed in the First Step project.
	Location Description	The OCURA properties are in the Culbertson's East Highland SNI neighborhood.
	Planned Activities	New construction of for-sale housing and SRO units
5	Project Name	CHDO Set-Aside Activities: Loan Pool and New Construction
	Target Area	
	Goals Supported	CHDO New Construction/Rehab- HOME
	Needs Addressed	Supply of Affordable Owner-Occupied Housing
	Funding	HOME: \$1,806,201
	Description	HOME funding provided for new construction or rehabilitation of a minimum of eight (8) housing units through Community Housing Development Organizations (CHDO) and non-profit housing providers (JPNA, NHS, OKC Housing Services Redevelopment Corp). CHDO Set-aside is allocated to local CHDOs for multiple projects, both rehab and new construction. Funds allocated through the CHDO Loan Pool must be repaid, excluding those provided for lead abatement which are forgiven. The funding above includes \$1,353,768.37 carry forward from prior years and \$452,432.60 in 2018-19 funding (\$372,432.60 Set-aside; \$80,000 unallocated loan pool).
	Target Date	6/30/2019

	Estimate the number and type of families that will benefit from the proposed activities	An estimated eight (8) low income households will achieve homeownership.
	Location Description	Approximately eight (8) housing units will be constructed or rehabilitated with CHDO set-aside funds during the Fourth Action Year Plan. Actual estimates of production cannot be provided until all funds have been allocated. Eight (8) units of homeowner housing for low and moderate-income families is estimated based on historical fund activity. Locations TBD.
	Planned Activities	New housing construction and/or rehabilitation
6	Project Name	STEAM Academy- E. Fields Elementary School
	Target Area	SNI Classen Ten Penn Neighborhood
	Goals Supported	Public Services, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure Strengthen Neighborhood Capacity
	Funding	CDBG \$60,000
	Description	One time funding allocation of \$60,000 to continue after school programming in the Classen Ten Penn SNI neighborhood. SNI activities are being wrapped up in 2018 and this allocation represents nominal continued support during the transition to new neighborhoods. After-school programming in the new SNI neighborhoods will be funded in from the regular SNI budget in activity number 12 below.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	An estimated Two Hundred Fifty (250) students at Eugene Fields Elementary in the Classen Ten Penn SNI neighborhood will be provided access to tutoring and after-school programming.
	Location Description	Classen Ten Penn SNI Neighborhood
	Planned Activities	After-school programming
7	Project Name	Oklahoma City Housing Authority-Public Housing Rehabs
	Target Area	Strong Neighborhoods Initiative
	Goals Supported	Rehabilitation of Public Housing Units- CDBG

	Needs Addressed	Quality of Public Housing
	Funding	CDBG: \$234,897
	Description	Provide CDBG funding to the Oklahoma City Housing Authority (OCHA) for the rehabilitation of and estimated ten (10) public housing units. The funding above will be provided solely in 2018-19.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	An estimated ten (10) extremely low-income households will access or maintain a rehabilitated public housing unit.
	Location Description	Funding restricted to OCHA operated public housing units.
	Planned Activities	Rehabilitation
8	Project Name	CAA Emergency Home Repair Program
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Emergency Repairs-CDBG
	Needs Addressed	Quality of Affordable Owner Housing
	Funding	CDBG: \$687,242
	Description	Provide CDBG funding to Community Action Agency (CAA) to fund emergency home repairs for a minimum of one hundred (100) homes for low to moderate income homeowners to address immediate threats to life, health and safety. Funding above will be provided solely in 2018-19.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	A minimum of one hundred (100) low to moderate income households will receive emergency home repairs.
	Location Description	City-wide, with priority given to properties located within the SNI neighborhoods and the NRSA.
	Planned Activities	Emergency home repairs.
9	Project Name	OCURA Affordable Housing Development
	Target Area	NEIGHBORHOOD STRATEGY AREA

	Goals Supported	Aid Blighted, Vacant, Underutilized Property-CDBG
	Needs Addressed	Acquisition/Clearance of Vacant, Blighted Property
	Funding	CDBG: \$46,625
	Description	Authorized carry-over funding and program income to OCURA as a subrecipient to support CDBG eligible activities that principally include but are not limited to real property acquisition, clearance and demolition, cleanup of contaminated sites, public facilities and improvements, and housing for the benefit of low to moderate individuals or low-mod income areas. Funding above has been carried forward from prior years.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Beneficiaries will be reported under individual project activities.
	Location Description	Locations not yet determined.
	Planned Activities	City-wide, with priority to project developments within the NRSA neighborhoods and Urban Renewal Areas.
10	Project Name	Housing Exterior Maintenance Program
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Exterior Maintenance and Storm Shelters-CDBG
	Needs Addressed	Quality of Affordable Owner Housing
	Funding	CDBG: \$1,184,000
	Description	Exterior maintenance will be provided to low income owner-occupied households in SNI and NRSA neighborhoods. The funding above will be provided solely in 2018-19.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	An estimated forty-five (45) low income owner-occupied households will be assisted with exterior maintenance. Funding will be prioritized in the SNI and NRSA neighborhoods, but remains available for use city wide.
	Location Description	City-wide with emphasis on NRSA and SNI neighborhoods.

	Planned Activities	Home Exterior Maintenance
11	Project Name	Public Services- SNI Hazardous Tree Removal
	Target Area	Strong Neighborhoods Initiative
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure
	Funding	CDBG: \$24,000
	Description	CDBG funds provided to trim and/or remove hazardous trees that pose a threat to personal and public safety in SNI neighborhoods. The project is funded under the SNI program which has an allocation of CDBG funds in the amount of \$856,718.11 in FY 2018-19.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Twenty (20) low to moderate income households will receive assistance in the removal of hazardous trees.
	Location Description	Funding is restricted to the SNI neighborhoods.
	Planned Activities	Public services-Hazardous tree removal
12	Project Name	Public Services- SNI After School Programs
	Target Area	Strong Neighborhoods Initiative
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure Strengthen Neighborhood Capacity
	Funding	CDBG: \$280,000
	Description	CDBG funding to support summer and after-school programming and tutoring for students in three (3) SNI neighborhoods (Capitol Hill, Capitol View, Culbertson's East Highland). The project is funded under the SNI program which has an allocation of CDBG funds in the amount of \$856,718.11 in FY 2018-19.
	Target Date	6/30/2019

	Estimate the number and type of families that will benefit from the proposed activities	An estimated Seven Hundred Fifty (750) students in SNI neighborhoods will be provided access to tutoring and after-school programming.
	Location Description	F.D. Moon Academy in Culbertson's East Highland. Capitol Hill and Capitol View neighborhoods; exact locations TBD. Funds are restricted to the SNI neighborhoods
	Planned Activities	After-school programming
13	Project Name	Public Services- SNI Legal Assistance to Homeowners
	Target Area	Strong Neighborhoods Initiative
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure
	Funding	CDBG: \$24,000
	Description	Provide legal fee assistance to homeowners and/or non-profit organizations in SNI neighborhoods using CDBG funds to assist in resolving title and probate issues to enable refinancing, home equity loans, and/or sale to third parties. The project is funded under the SNI program which has an allocation of CDBG funds in the amount of \$856,718.11 in FY 2018-19.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Ten (10) low to moderate income homeowners and/or three (3) non-profit organizations will obtain legal assistance.
	Location Description	Funds restricted to the SNI neighborhoods
	Planned Activities	Public Services-Legal assistance
14	Project Name	Public Facilities- SNI Neighborhood-led Projects
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure Strengthen Neighborhood Capacity

	Funding	CDBG: \$40,000
	Description	CDBG funding to support SNI neighborhood-led public facilities improvement projects. The project is funded under the SNI program which has an allocation of CDBG funds in the amount of \$856,718.11 in FY 2018-19.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Three (3) SNI neighborhoods will be assisted with neighborhood-led public facilities improvements.
	Location Description	Funds restricted to SNI neighborhoods
	Planned Activities	Public Facilities- Neighborhood improvements
15	Project Name	Public Facilities- SNI Tree Planting
	Target Area	Strong Neighborhoods Initiative
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure
	Funding	CDBG: \$15,000
	Description	CDBG funds provided to assist in tree planting efforts in SNI neighborhoods. The project is funded under the SNI program which has an allocation of CDBG funds in the amount of \$856,718.11 in FY 2018-19.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Fifty (50) low to moderate income homeowners will have trees planted on their property in SNI neighborhoods
	Location Description	Funds are restricted to the SNI neighborhoods
	Planned Activities	Public Facilities-Tree Planting
16	Project Name	Public Facilities- SNI Sidewalks Phase II
	Target Area	Strong Neighborhoods Initiative
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure

	Funding	CDBG: \$390,414
	Description	CDBG funds were provided for sidewalks in the SNI Neighborhoods. The project is partially funded with a special allocation from the Community Development Program in a prior year. The funding above represents the 2017-18 allocation. Project is nearing completion and no new funding is being allocated in FY 2018-19
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Thirty (30) low to moderate income residences will benefit from new sidewalks in SNI neighborhoods.
	Location Description	Funds are restricted to the SNI neighborhoods. Project will be concentrated over eight (8) Blocks in the Classen-Ten-Penn Neighborhood. New sidewalks will be installed on NW 11 th from Blackwelder to McKinley, along W. Park Place from Blackwelder to Mckinley, along Blackwelder from NW 25 th to Park Place, and along Blackwelder from Park Place to NW 10 th . All segments are nearing completion and most will be completed during the Third Action Plan Year with remaining work completed in the Fourth Action Plan year.
	Planned Activities	Public Infrastructure-Sidewalks
17	Project Name	Public Facilities- SNI Park Improvements
	Target Area	Strong Neighborhoods Initiative
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure
	Funding	CDBG: \$300,000
	Description	CDBG funds to support park improvements and healthy recreational opportunities in areas that serve primarily low to moderate income households. \$100,000 is estimated for improvements in the Capitol Hill neighborhood. The remaining \$200,000 is anticipated for park improvements in Capitol View. If there are left over SNI funds from other projects, those funds may be allocated towards one or both of these neighborhood parks. The project is funded under the SNI program which has an allocation of CDBG funds in the amount of \$856,718.11 in FY 2018-19.
	Target Date	6/30/2019

	Estimate the number and type of families that will benefit from the proposed activities	Two (2) parks in the SNI neighborhoods will be assisted with public facility improvements.
	Location Description	Funds are restricted to the SNI neighborhoods. Projects under consideration are in the Capitol View and Capitol Hill neighborhoods. A final determination has not been made.
	Planned Activities	Public Facilities- Park Improvements
18	Project Name	Rehab: Storm Shelters-SNI
	Target Area	Strong Neighborhoods Initiative
	Goals Supported	Exterior Maintenance and Storm Shelters-CDBG
	Needs Addressed	Quality of Affordable Housing
	Funding	CDBG: \$1,531
	Description	Funds are carry over from previous years and are being recaptured and re-allocated in FY 2018-19.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Approximately two (2) homeowners will receive a saferoom or storm shelter.
	Location Description	Funds are restricted to the SNI neighborhoods.
	Planned Activities	Rehabilitation: Storm shelter installation
19	Project Name	Public Services- COTPA (Embarck) Share-a-Fare Program
	Target Area	
	Goals Supported	Special Needs Transportation Services-CDBG
	Needs Addressed	Transportation Options -Special Needs Population
	Funding	CDBG: \$102,842

	Description	CDBG funding is provided for an estimated 15,350 subsidized taxi fares and bus tokens for approximately 3,100 low and moderate income special needs populations, including the homeless, elderly persons over age 62, and persons with disabilities. The funding above is provided solely in 2018-19.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	15,350 discounted taxi fares and bus tokens will be provided to approximately 3,100 senior citizens and persons with special needs.
	Location Description	City-wide
	Planned Activities	Discounted taxi fare and bus coupons for low and moderate income special needs populations.
20	Project Name	Public Services-CAA Graffiti Removal
	Target Area	
	Goals Supported	Graffiti Removal-CDBG
	Needs Addressed	Public Services-Graffiti Removal
	Funding	CDBG: \$15,011
	Description	CDBG funding to support the elimination of graffiti for Four Hundred Fifty (450) locations as a crime prevention activity. The funding above is provided solely in 2018-19.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Graffiti will be removed at Four Hundred Fifty (450) locations within low and moderate-income neighborhoods. A greater community benefit exists as a crime prevention activity but cannot be quantitatively measured apart from the location of the properties served.
	Location Description	City-wide
	Planned Activities	Graffiti removal
21	Project Name	Public Services-OKC Abandoned Housing
	Target Area	
	Goals Supported	Secure Vacant and Abandoned Properties- CDBG
	Needs Addressed	Address Slum and Blight- Vacant Abandoned Bldgs

	Funding	CDBG: \$68,562
	Description	CDBG funding for interim assistance to secure a minimum of 100 vacant and abandoned properties to address slum and blight on a spot basis. The funding above is provided solely in 2018-19.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 100 vacant and abandoned homes will be secured in low and moderate-income neighborhoods to remove imminent threats to life, health and safety. A greater community benefit exists; however, it cannot be quantitatively measured apart from the properties secured.
	Location Description	City-wide
	Planned Activities	Secure vacant buildings
22	Project Name	Midtown Neighborhood Improvement Project
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure
	Funding	CDBG: \$1,266
	Description	Prior year public infrastructure activity to fund installation of lighted public kiosk/monument signs in the Midtown neighborhood for way finding and pedestrian safety. Surplus funding in the amount of \$1,266.41 is being recaptured and re-allocated for FY 2018-19
	Target Date	3/30/2018
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 4,000 persons will benefit from new neighborhood kiosks/monument signs in the Midtown neighborhood.
	Location Description	Midtown Neighborhood
	Planned Activities	Sign Kiosks Installation
23	Project Name	Community Dev Program- Public Facilities/Infrastructure-CDBG
	Target Area	
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure Sustainability Service Provider Facilities-CDBG

	Funding	CDBG: \$2,197,995
	Description	Funding for community public facilities projects and infrastructure in the amount of \$149,696.01 has been carried forward for the Metropolitan Better Living Center. Funding in the amount of \$400,000 has been carried forward for a Kiwanis Head Start facility. \$193,000 has been carried forward for utilities installation at First Step Men's Rehab SRO's and an additional \$149,703 carried forward for public facilities assistance at this same facility. \$74,731.85 is carried forward for completion of the Winds House AIDS Support Program. \$20,000 is carried forward for public art at Red Andrews Park. Additional unallocated funding for the Community Development Program in the amount of \$1,110,864.61 is carried forward. New FY 2018-19 funding in the amount of \$60,000 is allocated to the Community Health Centers Healing Hands program for public services for the homeless and \$40,000 for a Summer Parks Project. The funding above includes balances carried forward totaling \$2,097,995.47 and new program allocations totaling \$100,000.00. Total funding for this activity is \$2,197,995.47.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	The MBLC is projected to provide services to 450 persons per year upon completion (anticipated during the Third Action Plan Year ending June 30, 2018). Healing Hands will provide services to approximately 680 persons. Four (4) units will be assisted at Winds House. Nine (9) SRO units are projected to be completed at the First Step men's lodge. Kiwanis is just underway with no benefit anticipated during the program year. The Red Andrews public art project will provide community-wide benefit.
	Location Description	City-wide
	Planned Activities	Rehabilitation, public services and infrastructure
24	Project Name	CAA Small Business Services
	Target Area	City-wide
	Goals Supported	Small Business Technical Assistance- CDBG
	Needs Addressed	Economic Opportunities for Low and Moderate Income
	Funding	CDBG: \$39,149
	Description	CDBG funding provided for technical assistance to a minimum of 125 small businesses. Funding will be provided solely in 2018-19.
	Target Date	6/30/2019

	Estimate the number and type of families that will benefit from the proposed activities	An estimated 125 small businesses will be provided with technical assistance.
	Location Description	City-wide
	Planned Activities	Small business technical assistance
25	Project Name	HUD Section 108 Loan Repayment
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Section 108 Loan Assistance- CDBG
	Needs Addressed	Economic Opportunities for Low and Moderate Income
	Funding	CDBG: \$350,000
	Description	No jobs are expected to be created during the Fourth Action Plan Year as a result of new Section 108 loans. The City will consider other projects for use of Section 108 as opportunities arise. The allocated funding is the anticipated debt service on outstanding Section 108 loans which would be payable to HUD from CDBG entitlement funds if a financed project were to default. If all loans are repaid timely, no funds will be expended for this activity. Funds are carried over from prior years. No new funding is anticipated in 2018-19.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	It is anticipated that no jobs will be created in the Fourth Action Year Plan period. Funding will remain in contingency as insurance against a potential loan default and loss of CDBG entitlement funds.
	Location Description	Addresses of future projects are yet to be determined.
	Planned Activities	Job creation
26	Project Name	Urban Renewal Authority-Economic Opportunity
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Aid Blighted, Vacant, Underutilized Property- CDBG Affordable Housing-AHDP and RHP- CDBG and HOME
	Needs Addressed	Acquisition/Clearance of Vacant, Blighted Property
	Funding	CDBG: \$809,386

	Description	Funding for Oklahoma City Urban Renewal Authority (OCURA) for eligible activities that meet the National Objectives of Urban Renewal Completion or Slum/Blight Area Benefit. Activities principally include but are not limited to real property acquisition, clearance, disposition for housing or economic development in close-out and locally defined Urban Renewal Project Areas and urban renewal completion activities in close-out areas. The above funding includes funds carried forward from prior years in the amount of \$20,506.71. A new allocation of \$788,880 will be provided in 2018-19. Total funding for FY 2018-19 is \$809,386.71.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	The number of program beneficiaries is contingent on the size and scale of projects funded.
	Location Description	Urban Renewal Project Areas
	Planned Activities	Acquisition, disposition, clearance, relocation and Urban Renewal completion
27	Project Name	CDBG Commercial District Economic Development RLF
	Target Area	
	Goals Supported	Small Business Revolving Loan Fund- CDBG
	Needs Addressed	Economic Opportunities for Low and Moderate Income
	Funding	CDBG: \$300,000
	Description	Provide revolving loan fund (RLF) assistance to a minimum of two (2) businesses or microenterprises to create jobs and/or expand commercial services for low-mod benefit or limited clientele. This activity was capitalized with prior year CDBG funding. No additional contributions are anticipated in 2018-19. \$300,000 was carried forward from prior years. \$35,000 of this allocation has been awarded to Confections LLC and applicant is drawing funds.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	A minimum of two (2) new or expanding businesses or microenterprises will be supported resulting in job creation and/or job retention. The number of employees added or retained will vary based upon the size and needs of the businesses supported.

	Location Description	Businesses must be located within the boundaries of designated Commercial District Revitalization Program Area or Business Improvement District (excluding the downtown central business district).
	Planned Activities	Financial support for business start-ups and expansions
28	Project Name	Empowerment Zone Staff Support
	Target Area	Neighborhood Revitalization Strategy Area and Designated Empowerment Zone
	Goals Supported	Empowerment Zone Staffing- CDBG
	Needs Addressed	Economic Opportunities for Low and Moderate Income
	Funding	CDBG: \$1
	Description	The City will continue to provide staff support for continued implementation of the Empowerment Zone designation, if the program is extended or re-established beyond December 31, 2017 with a future legislative action. No funding is allocated at the present time.
	Target Date	6/30/2018
	Estimate the number and type of families that will benefit from the proposed activities	The Empowerment Zone designation expired on December 31, 2017. It is not known if it will be extended or re-established. No beneficiaries have been identified as the future of the program is uncertain.
	Location Description	Restricted to the EZ eligible boundaries
	Planned Activities	Administration-Staff Support
29	Project Name	Administration-Metro Fair Housing Council
	Target Area	City-wide
	Goals Supported	Administration
	Needs Addressed	Administration
	Funding	CDBG: \$82,745
	Description	Funding is provided to the Metro Fair Housing Council to undertake all Fair Housing activities on behalf of the City to include enforcement, education and compliance. The above funding will be provided solely in 2018-19.
	Target Date	6/30/2019

	Estimate the number and type of families that will benefit from the proposed activities	Funding will support approximately 493 Housing Complaint Intakes, 13 Formal Housing Discrimination Complaints, 23 Fair Housing/Fair Lending Rights Seminars, 41 Requests for Reasonable Accommodation or Modification, and 69 Fair Housing Tests.
	Location Description	City-wide
	Planned Activities	Fair Housing activities
30	Project Name	Administration-Planning
	Target Area	
	Goals Supported	Administration
	Needs Addressed	Administration
	Funding	CDBG: \$60,000
	Description	Administration-Planning activities for various initiatives including but not limited to preparation of small area plans, the annual Action Plan, the Consolidated Annual Performance Evaluation Report (CAPER) and the five-year Consolidated Plan. The above funding will be provided solely in 2018-19.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Beneficiaries of Planning support will be reported under individual projects and activities.
	Location Description	City-wide
	Planned Activities	Administrative and Planning activities related to plan preparation
31	Project Name	Administration- CDBG and HOME
	Target Area	
	Goals Supported	Administration
	Needs Addressed	Administration
	Funding	CDBG: \$852,554/HOME: \$428,229

	Description	Administrative expenses for CDBG and HOME program operations and management. CDBG funding noted above will be provided solely in 2018-19. The HOME Administration allocation of \$428,229 includes \$1,069.28 carried forward from 2016-17, an additional \$174,671.32 carried forward from 2017-18, and \$252,488.40 in new funding for 2018-19.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Beneficiaries will be reported under individual program activities.
	Location Description	City-wide
	Planned Activities	Program Administration
32	Project Name	ESG Activities
	Target Area	
	Goals Supported	Housing for the Chronically Homeless- ESG
	Needs Addressed	Supportive Housing for the Chronically Homeless Services for Homeless Youth (Age 21 and under) Sustainability of Transitional Housing Increased Employment Rate for CoC Participants Homeless Households with Children Public Facilities, Services and Infrastructure
	Funding	ESG: \$394,559

	Description	ESG Funds will be used for the following Activities: 1) To provide housing and case management resources for up to fifty (50) chronically homeless individuals and veterans. 2) To provide support for the planning of future Drop-in facilities and/or shelters for homeless youth to be completed in a future program year (none expected to be completed during the Fourth Action Year). 3) To decrease the number of homeless households with children by providing rapid re-housing and prevention resources for eighty (80) families. 4) To reduce evictions by providing legal services for up to 150 individuals and families. 5) To provide health care services to over 1,500 low income and homeless individuals. 6) To provide shelter and outreach services for six hundred (600) youth and elderly individuals, victims of domestic violence, and individuals with mental illness. The total ESG allocation is \$394,559 of which \$27,619.13 (7%) will be used for administration. The ESG funding recommendations total \$366,940 and are itemized in the Appendices (Appendix 8). The highlighted line items in the funding recommendations total \$193,000 and represent projects that are not related to shelter and outreach (52.6% of the total expenditures exclusive of admin).
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	It is projected that two thousand (2,000) extremely low income homeless households and/or individuals at risk of becoming homeless will access ESG services. This total does not include the recently opened Drop-in Center for homeless youth since there is no historical data available to project the number of beneficiaries.
	Location Description	City-wide
	Planned Activities	Housing for the chronically homeless, supportive case management and social services, employment assistance, rapid re-housing, homelessness prevention, and ongoing planning for a public facility for homeless youth.
33	Project Name	HOPWA Activities
	Target Area	City-wide
	Goals Supported	STRMU for Persons with HIV/AIDS- HOPWA TBRA for Persons with HIV/AIDS- HOPWA
	Needs Addressed	Housing Availability-Persons With HIV/AIDS
	Funding	HOPWA: \$702,611

	Description	Tenant Based Rental Assistance (TBRA) will be provided to thirty (30) low or extremely low-income households to prevent homelessness. Short Term Rent, Mortgage and Utility (STRMU) assistance to prevent homelessness will be provided for 115 eligible persons or households. Other HOPWA eligible activities will also be supported with these funds. The total HOPWA allocation is \$702,611 of which \$21,078.33 is set aside for City of Oklahoma City administration (3%). An additional \$47,707.29 is allocated to Sponsor Administration (7% of the award exclusive of City Administration).
	Target Date	6/30/2018
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 145 low income households affected by HIV/AIDS will benefit from the proposed activities.
	Location Description	City-Wide
	Planned Activities	Tenant Based Rental Assistance, and Short term rental, mortgage and utility assistance to prevent homelessness. Additional activities will also be supported (e.g. services, healthcare, etc.)
34	Project Name	Housing Reconstruction-CDBG
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Affordable Housing-AHDP and RHP- CDBG and HOME
	Needs Addressed	Supply of Affordable Owner-Occupied Housing
	Funding	CDBG: \$115,000
	Description	Funding provided in prior years to reconstruct a single family residence for a low to moderate income homeowner. The original Structure was declared unsafe and was demolished by the City. Funds are carried forward. No additional funding will be provided in 2018-19.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	One (1) household will benefit from the reconstruction of a single family home.
	Location Description	Property is located at 1616 NW 29th Street
	Planned Activities	Reconstruction

AP-50 Geographic Distribution – 91.220(f)

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

The City of Oklahoma City is the largest city in the State of Oklahoma in both population and land area. Based on 2016 ACS data, The City of Oklahoma City is comprised of just over 620,000 persons contained within a land area of over 620 square miles. The community is racially diverse with a total minority population exceeding 31%. The minority population in Oklahoma City remains in transition. In the 2016 American Community Survey, persons of Hispanic or Latino origin represent 18.5% of the total population. African American persons, formerly the largest minority/ethnic population in Oklahoma City, now comprise 14.3% of the total population. Black and African American families are disproportionately located in the eastern and northeastern Census tracts. The Hispanic and Latino population continues to be concentrated in the southwest and western Census tracts of the city.

The City of Oklahoma City applied for and received a Neighborhood Revitalization Strategy Area (NRSA) designation from HUD that consists of all or part of 45 low-income census tracts covering an area of approximately 29.5 square miles. In addition, the NRSA contains approximately 20 square miles that lie within an area designated by HUD as both an Enterprise Community and an Empowerment Zone (Round III). The Empowerment Zone designation was extended to December 31, 2017. It is unknown if it will be further extended or eliminated. 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 Census Tracts and Block Groups that comprise the NRSA include: 100400, 100500, 100700, 101000, 101100, 101200, 0101300, 101400, 101500, 101600, 101900, 102400, 102500, 102600, 102700, 102800, 102900, 103000, 103101, 103102, 103200, 103300, 103400, 103500, 103601, 103602, 103700, 103800, 103900, 104000, 104100, 104200, 104300, 104400, 104600, 104700, 104800, 104900, 105600, 105700, 105800, 1053002, 1053003, 1070012, 1070013, 1070014, 1070021, 1070022, and 1073051.

Geographic Distribution

Target Area	Percentage of Funds
NEIGHBORHOOD STRATEGY AREA	80
Strong Neighborhoods Initiative	

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City targets resources strategically to support neighborhood revitalization efforts in the areas with the greatest community need. The Strong Neighborhoods Initiative (SNI) is a concentrated effort by the City to identify and revitalize areas that have suffered from recent disinvestment with a goal of ending

decline and restoring neighborhoods to economically viable and sustainable communities. Rather than allocate funds sporadically throughout the City on a haphazard basis, we have chosen to focus resources strategically in a manner that will allow for noticeable improvement and positive impact over the long term.

The NRSA was chosen because it surrounds the center of the city, and contains a large segment of the lower-income population who need residential assistance and remediation of lead-based paint. The NRSA received its designation in part based on documented need, its geographic location encompassing much of the central city, and its concentration of lower income residents. As a result, the City of Oklahoma City has and will continue to focus on the NRSA as the area where most federal funds will be expended to benefit the largest numbers of lower-income residents and areas of greatest need within the community.

Discussion

The City of Oklahoma City strives to invest 80% of federal CDBG and HOME dollars within the NRSA, with an additional 20% allocated to projects and activities outside the NRSA boundaries. ***The SNI neighborhoods lie within the NRSA*** and are strategically targeted for reinvestment. Resources are allocated to SNI neighborhoods to the greatest extent possible. Two (2) new SNI neighborhoods, Capitol View and Capitol Hill were selected during the Third Action Plan Year for new investment. Classen North Highlands Park was identified as self-sustaining and no longer eligible for SNI support. Work in Classen Ten Penn is nearing completion and should be fully completed during this Fourth Action Plan year. Culbertson's East Highlands neighborhood has not met established goals and will continue to receive SNI support in the Fourth Action Plan Year.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The objectives of the 2015-2019 Consolidated Plan and the First Action Year Plan were developed through review and analysis of CHAS data, consultations with service providers, input from citizens on the development of the plan, and an analysis of community needs and objectives as identified in the Needs Analysis. In the 2018-19 Fourth Action Year Plan, the City of Oklahoma City will continue to prioritize annual allocations based upon the objectives identified in the Consolidated Plan.

The objectives that address housing, homeless, non-homeless special needs populations and community development needs were given a priority ranking based on the expectation of funding during the term of the Consolidated Plan. Objectives that received a high ranking were prioritized by funded program activities in the Fourth Annual Action Plan Year. Activities receiving a Low rating remain areas of need, and will be assisted during the term of the Fourth and Fifth Action Plan years as resources allow.

In general, the objectives contained in the Consolidated Plan primarily focus on stimulating neighborhood revitalization by encouraging the development and rehabilitation of affordable owner housing, and by activities that stimulate affordable home ownership. These objectives continue to inform the funding process in the Fourth Action Plan Year. The Consolidated Plan rental housing objectives call for the creation of affordable rental housing to address special needs populations and for targeting affordable rental housing for the elderly and families by size and income range. The Plan objectives that relate to the homeless and persons with special needs, including persons with HIV/AIDS, focus on program activities designed to provide housing assistance and social services to the underserved populations. Finally, the community and economic development objectives address needed public facilities and services, remedy problems with blight and neighborhood decay, and encourage business development and the creation of employment by improving access to capital through small business lending programs.

Please refer to the Strategic Plan Priorities and Annual Action Plan goals for specific annual goals and activities. The annual objectives of the Consolidated Plan regarding Non-housing Special Needs including HOPWA are discussed in the appropriate sections of this report. Due to the availability of reliable data regarding needs and the availability of services, annual goals for Non-homeless Special Needs were developed by reviewing outcomes from past program activities.

The one year housing goals noted below are based on proposed goals and activities for the 2018-2019 Annual Action Plan year. It is anticipated that these annual goals will be largely consistent over the remainder of the current Five-year Consolidated Plan, provided that annual allocations from HUD are not substantially reduced or eliminated in their entirety. The estimates provided do not include the

provision of emergency shelter, transitional shelter, or social services. The numbers for rehabilitation include whole house rehab, public housing unit rehabs, storm shelter installation, and emergency home repairs. Units purchased using down payment assistance are included in the “production of new units” field.

One Year Goals for the Number of Households to be Supported	
Homeless	3,100
Non-Homeless	90
Special-Needs	600
Total	3,790

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	145
The Production of New Units	17
Rehab of Existing Units	175
Acquisition of Existing Units	1
Total	338

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The City does not have a program to assist cost burdened homeowners with subsidies for mortgage or utility payments. However, the City's housing rehabilitation program can address substandard conditions with interest-free loans of up to \$42,500 for qualified lower-income homeowners. Terms of the interest-free loans are based on the household's ability to pay. The program has a minimum payment of \$75 a month. Within SNI neighborhoods, loans may be up to \$60,000, do not require monthly payments and are forgivable providing program requirements are met. Senior citizens that are 62 years of age or older and have gross household income less than 60% of median at the time of application are eligible for a "Senior Loan" (a 10-year forgivable loan amortized at the rate of 1/60th a month). The borrower must continue to occupy the property for the term of the loan. If occupancy is terminated, whether voluntarily or involuntarily, any remaining balance generally must be repaid. An exception is made for seniors who are incapacitated and the loan may be forgiven if the applicant passes away or is placed in an establishment that provides housing and general care for the aged or convalescent.

The cost of lead-based paint abatement within a housing rehab project is provided in the form of a grant with a \$15,000 limit and is not added to the forgivable rehabilitation loan.

Programs to Assist Homeowners:

- CDBG Emergency Home Repair Program
- CDBG Exterior Maintenance and Storm Shelter Program
- HOME OKC Housing Assistance Program (Whole House Rehab)
- Lead-based paint abatement in conjunction with the three previous listed programs
- Oklahoma City Housing Authority Section 8 Homeownership Program thru OCHA.
- Homeownership Opportunity Program
- Housing Reconstruction

Projected 2017-2018 Housing Accomplishments:

- 80 Emergency home repairs
- 49 Exterior Maintenance projects
- 19 Whole house rehabilitation projects
- 1 Home Ownership Program acquisition/rehabs
- 33 Down Payment Assistance Loans
- 2 CHDO Homes Constructed
- 1 OCURA Home Constructed
- 0 Non-Profit SNI Homes Constructed
- 10 Public Housing Unit Rehabs
- 145 Persons Provided Rental and/or Utility Assistance

AP-60 Public Housing – 91.220(h)

Introduction

As capital improvement funding from HUD continues to decrease, the Oklahoma City Housing Authority (OCHA) continues to struggle with deferred maintenance issues. Although resources are scarce, The City will continue to assist in rehabilitation of public housing units. CDBG funds are provided in the Fourth Action Plan Year to support the rehabilitation of public housing units.

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

The City of Oklahoma City will continue to work with OCHA to increase the overall quality of public housing. Presently, the Housing Authority has sufficient resources to manage their properties; however, are unable to make all the needed upgrades and repairs. All housing is considered "average" by the Housing Authority. The City will provide CDBG funding for rehabilitation of approximately ten (10) public housing units.

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

OCHA has set a goal of assisting ten (10) families annually in achieving homeownership through the Housing Authority Family Self-Sufficiency Program and the Housing Authority Homeownership Program. Tenants are encouraged to pursue opportunities for homeownership through these programs as funding allows.

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

Not Applicable

Discussion

The Oklahoma City Housing Authority (OCHA) administers the public housing rental projects owned by the Housing Authority and administers the Section 8 rental assistance voucher program. Section 8 is a Federal program that provides rental assistance to low and very-low income families to obtain decent, safe and sanitary housing. The subsidy provides that an eligible tenant must pay (the higher of) 30% of adjusted income or 10% of gross income as their share of the rent; Section 8 funds make up the difference between the amount paid by the tenant and the fair market rent established for the rental unit by the Housing Authority and HUD.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

In 2009 the Homeless Prevention and Rapid Rehousing (HPRP) program was created by the American Recovery and Reinvestment Act. This unprecedented funding offered an opportunity to change the way homeless services are delivered in Oklahoma City. This program features a coordinated effort by homeless service providers to introduce person-centered planning, service coordination, financial assistance, and needs based supportive services. The City of Oklahoma City continues to build on the lessons learned from HPRP and features the same philosophy of preventing and solving homelessness with data driven evidence and system coordination.

The City and local service providers manage a community-wide effort to prevent and end homelessness within the Continuum of Care by building inter-agency partnerships. These partnerships work together to provide members of the community with the necessary tools to remain in their homes or to obtain appropriate affordable permanent housing. All community partners work to provide a streamlined process of screening, assessment, referral, service coordination, direct assistance and follow up to individuals and families needing safe, affordable and stable housing.

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

To reach unsheltered homeless individuals and families, ESG funds are used for outreach activities to help connect this population with emergency shelter, housing, and/or services. Assistance is sometimes extended to non-facility based medical/mental health care if recipients of that care are unable or unwilling to access an appropriate health facility. The City also conducts an annual Point-in-Time (PIT) count each January to identify current trends and service needs in the community.

Activities supported in recent years to address homelessness included CDBG and HOME funding for the completion of a twenty (20) unit SRO project on the WestTown homeless campus for persons transitioning to permanent housing, including associated services and administrative support. HOPWA funding is used to support the provision of Short Term Mortgage and Utility Assistance (STRMU) and Tenant Based Rental Assistance (TBRA). ESG funds continue to support housing and case management activities for families and veterans. ESG funding is also committed for rapid re-housing and prevention services for homeless households with children. Lastly, ESG funding aided the creation of one drop-in center for homeless youth in the First Action Plan Year which is now open and operational. In the Third Action Plan Year, the drop-in center was moved and expanded and some shelter capacity was added. Additional facilities are under discussion to the extent that resources allow; however, none are expected to be constructed or completed during the Fourth Action Plan Year.

Addressing the emergency shelter and transitional housing needs of homeless persons

In the Fourth Action Plan Year, ESG funds are being used to provide essential services to homeless families and individuals in emergency shelters as well as to support shelter operation costs. Costs associated with renovation or rehabilitation of structures to be used as emergency shelters is also an eligible use of funds. The City remains focused on housing relocation and stabilization services such as financial assistance and case management, which tend to be more intensive and longer in duration. In some instances, direct financial assistance may be available to assist in the payment of rental and security deposits. Persons transitioning from homelessness are matched with the appropriate supportive case management services to ensure long term sustainability of housing.

The rapid re-housing program includes financial assistance and case management for households who are homeless, have resolvable barriers to housing, and are likely to sustain housing after the subsidy ends. Case managers work to move program participants quickly from emergency shelters or other places not meant for human habitation into independent housing, where they receive case management and services designed to improve their housing stability. The provision of case management occurs (1) to ensure households have a source of income through employment and/or public benefits, and to identify service needs *before the move into permanent housing*; and (2) to work with households *after the move into permanent housing* to connect families with community based services to meet long term support/service needs and to help solve any remaining problems that threaten the clients' tenancy including difficulties sustaining housing or interacting with the landlord. Home-based case management will be a vital component of rapid re-housing.

Families and individuals may participate in the rapid re-housing program if they have barriers to stability that can be addressed in a community-based setting once they are housed. Those who cannot reasonably be expected to achieve stability within twelve (12) months are referred to other, more appropriate supportive housing programs (transitional, permanent supportive, or treatment). The case manager is responsible for providing the appropriate supportive services and follow-up care, including home-based visits, for all program participants.

The framework for case management in the rapid re-housing program will consist of Permanent housing services. Permanent housing services are services that assist households in accessing housing within twenty-one (21) days of assessment, and sustaining that housing for at least seven (7) months after exiting the program. This includes working with the client to identify affordable units, access housing subsidies, and negotiate leases. Clients may require assistance to overcome barriers, such as poor tenant history, credit history and discrimination based on ethnicity, gender, family make-up and income source. Case managers work with the Housing Resource Locator to locate appropriate housing.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals

and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Service providers in the community who partner with the City direct homeless persons to the appropriate services and financial assistance needed to achieve independent living. This may include assistance in obtaining permanent housing, medical treatment, mental health treatment, counseling, supervision, and other government or private assistance available such as:

- Medicaid
- Supplemental Nutrition Assistance Program
- Women, Infants and Children (WIC)
- Federal-State Unemployment Insurance Program
- Social Security Disability Insurance
- Supplemental Security Income
- Child and Adult Care Food Program
- Veterans Services

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

ESG funding allocated in the Fourth Action Year Plan includes financial assistance and case management for households that are currently housed, but are at imminent risk (within two weeks) of becoming homeless. These households need temporary rent or utility assistance to prevent them from becoming homeless, or financial assistance to move to another unit. In cases where households desire to remain in housing that is substandard, it is allowable for case managers to assist in locating and moving households to units that meet minimum housing standards. Households receiving prevention assistance may require minimum supportive services and follow-up care. The case manager is responsible for providing the appropriate supportive services and follow-up care, as needed on a case by case basis. It is anticipated that most prevention assistance will last for one (1) to six (6) months. A standardized housing assessment and housing plan will be completed for all program participants to ensure housing stability after ESG assistance terminates.

Prior to issuing financial assistance, case managers work with the Housing Resource Locator to conduct a habitability and lead-based paint inspection of the home. A visual assessment/inspection for potential lead-based paint hazards is conducted for all pre-1978 units in which a pregnant woman and/or child under the age of six will be residing before financial assistance is provided. Visual assessments/inspections must be conducted regardless of whether the program participant is receiving

assistance to remain in an existing unit or moving to a new unit. All case managers are required to become a HUD-certified Lead-Based Paint Visual Assessor by successfully completing the twenty (20) minute online training course on conducting visual assessments on HUD's website (even though the Housing Resource Locator is responsible for visual assessments/inspections).

The assigned case manager typically contacts the landlord or utility company immediately to pledge assistance in preventing or delaying imminent eviction or utility disconnections. If the case manager/Housing Resource Locator deems the housing to be substandard, the case manager assists the household and the Housing Resource Locator to identify and secure more appropriate housing. Program participants must demonstrate adequate earnings to sustain their permanent housing at the conclusion of program services.

While clients are participating in the prevention program, they are contacted by their case manager for monthly follow-ups, or more frequently if necessary. Case managers conduct monthly follow-ups for nine (9) months after assistance terminates to ensure housing stability.

Discussion

The City of Oklahoma City and local service providers use the Homeless Management Information System (HMIS) to track services provided to the homeless, and to prevent duplication of resources. Providers are required to record client demographic and program data in HORIZON, the community's Homeless Management Information System (HMIS). All ESG partner agencies must comply with HUD's most recent HMIS Data Standards and agree to maintain excellent data integrity by entering 100% of required data fields in real time (data entered at time of service). To assist in this requirement, agencies run and/or review appropriate reports weekly to ensure consistent compliance. Agencies are required to correct inaccurate or incomplete data within three days and seek HORIZON'S network support and technical assistance, as needed, to ensure proper software usage and excellent data integrity.

Though many outreach and shelter activities are supported by ESG and Continuum of Care funding, most funded activities focus on housing. Services provided include financial assistance to pay for housing, services designed to retain housing, and services to help locate appropriate and affordable housing. Since not all participants have the same level of need, not all persons receive identical levels of assistance. Activities funded for the homeless are not intended to provide long-term support for program participants, nor can funded programs address all financial and supportive services needs of beneficiaries required to ensure future housing stability. Rather, the assistance provided is focused on stabilization of current housing, linking program participants to community resources and mainstream benefits, and helping them develop a plan for future housing stability.

AP-70 HOPWA Goals– 91.220 (I)(3)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	115
Tenant-based rental assistance	30
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	145

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

AP-75 RESPONSES ARE ATTACHED IN **APPENDIX 9** DUE TO CHARACTER SPACE LIMITATIONS IN THESE FIELDS.

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

AP-75 RESPONSES ARE ATTACHED IN **APPENDIX 9** DUE TO CHARACTER SPACE LIMITATIONS IN THESE FIELDS.

Discussion:

AP-75 RESPONSES ARE ATTACHED IN **APPENDIX 9** DUE TO CHARACTER SPACE LIMITATIONS IN THESE FIELDS.

AP-85 Other Actions – 91.220(k)

Introduction:

The local and federal resources are insufficient to address all needs, even those of high priority. In some instances, there are perceptions in the community that affordable housing will decrease area property values as well as facilitate other societal problems (NIMBY issues). There is a lack of interest from service providers in developing permanent supportive housing for the chronically homeless (lack of developers). Private builders are not interested in and/or cannot produce positive cashflow from affordable units without deep financial subsidy.

Actions planned to address obstacles to meeting underserved needs

Fair Housing Activities are funded with CDBG under General Program Administration. The services are provided by Metropolitan Fair Housing Council which investigates and reports on fair housing for the City to ensure equitable access and opportunity for all persons.

Grant funds covered under the Consolidated Plan Fourth Action Year Plan and other grant or loan funds are utilized to provide services and activities that benefit the various segments of lower-income populations in a responsible and comprehensive manner. Funds are allocated to activities that are not duplicative or competitive. Funds are allocated to activities that are designed to serve all segments of the population in the areas of concentrated lower-income persons. As additional funding becomes available, solicitations for proposals may be made, or The City may receive and consider unsolicited proposals to fund eligible projects.

The primary weakness in the delivery system is lack of funds to address the identified needs within the community. The City continues to address underserved needs by prioritizing the programs believed to provide the most benefit to the greatest number of lower-income residents in concentrated low-income neighborhoods.

Actions planned to foster and maintain affordable housing

In general, the objectives contained in the Consolidated Plan primarily focus on stimulating neighborhood revitalization by encouraging the development and rehabilitation of affordable owner housing and by activities that stimulate affordable home ownership. The Consolidated Plan rental housing objectives call for the creation of affordable rental housing to address special needs populations and for targeting affordable rental housing for the elderly and families by size and income range.

Funds for activities that support new housing construction under the HOME program are provided to the Community Housing Development Organization Program (CHDO), and to the Strong Neighborhoods Initiative (SNI) Program. The City provides funding to certified CHDOs based on requests from CHDOs in good standing. The successful CHDOs are awarded HOME CHDO set-aside funds to

construct, and in some cases, rehabilitate existing housing units in targeted neighborhoods. SNI funding for new housing construction is typically limited to non-profit organizations and is awarded on a competitive basis.

Occasionally, if unanticipated funding becomes available, The City may release Requests for Proposals for eligible affordable housing project proposals.

Housing rehabilitation activities are provided through The Oklahoma City Housing Assistance Program citywide with emphasis on the NRSA, and with specific attention to projects within the Strong Neighborhoods Initiative areas. Funding is allocated to conduct owner occupied whole house rehabilitation activities for eligible lower income households.

A priority for use of HOME and CDBG funding allocated for housing is to reverse patterns of gentrification by incentivizing mixed income housing in and near the economic growth areas of the urban core including, but not limited to the Downtown District, Bricktown, Core-to-Shore Park area, Midtown, Film Row and Art District areas of the City. A second priority for use of both HOME and CDBG funding for housing is to reverse patterns of low income concentration in certain economically challenged areas of the NRSA by incentivizing mixed income housing through the aggregation of assisted housing activities.

Single Unit Rehabilitation is addressed by CDBG funding through eligible program activities that include the Oklahoma City Housing Assistance Program's Housing Exterior Maintenance, CAA's Emergency Home Repair program, the CDBG Affordable Housing Assistance Program, and on a targeted basis projects within the Strong Neighborhoods Initiative areas. These programs require income qualification and environmental review compliance.

Public Housing Modernization is provided through the Oklahoma City Housing Authority (OCHA). OCHA is allocated CDBG funds to make needed repairs to approximately ten (10) public housing units annually.

Actions planned to reduce lead-based paint hazards

The Oklahoma City Council has adopted a Lead-Based Paint Policy that provides for compliance with the requirements of 24 CFR Part 35 regarding assessment and treatment of lead-based paint hazards.

The City funds various activities that fall into the category of residential rehabilitation. Whenever residential rehabilitation activities funded by the City are conducted, the regulations prescribed for lead-based paint, contained at 24 CFR Part 35 will be the guide for achieving compliance. Under the regulations, the City is required to adopt proper approaches to Lead Hazard evaluation, to provide regulatory notifications to the homeowner, to perform Lead Hazard evaluation, and to follow safe work practices and clearance requirements. For activities involving rehabilitation under Subpart J, Tenant Based Rental Assistance under Subpart M, if any, and Subpart K for Homebuyers and special needs properties, options for remediation of lead based paint and potential funding sources for cleanup will be

discussed with the applicant based upon the amount of funds available for each activity.

CDBG funds are allocated to one or more organizations to provide technical assistance for organized neighborhoods in eligible low-income census tracts throughout the city. As a condition for receiving capacity building funds, the City will require that neighborhood organizations in CDBG-eligible census tracts be alerted to the dangers of lead-based hazards particularly for children, and urge neighborhood campaigns to have children tested for elevated lead blood levels.

The City is directly involved in alerting and educating households participating in our programs about lead hazards, and indirectly through each of its sub recipients, Community Housing Development Organizations (CHDOs), and other for-profit and nonprofit organizations providing housing. All applicants seeking housing assistance from the City receive a pamphlet informing them of the dangers of lead hazards. If assistance is granted, the applicant signs for this information at loan closing.

The City's housing rehabilitation inspectors are licensed and certified as lead-based paint risk assessors, inspectors and abatement supervisors. The services of the licensed staff are used by most of the City's housing providers receiving Federal funds from the City and other non-profit housing providers contract for the services.

All rehabilitation staff members are certified as Lead Abatement Supervisors and Risk Assessors for target housing and child-occupied facilities. The Rehabilitation staff inspectors are also trained in NITON Spectrum Analyzer/Radiation Safety. Emergency home repair is conducted for the City by a sub-grantee capable of independently performing lead-based paint responsibilities. Additionally, sub-grantees, non-profit borrowers, CHDOs, and other funding recipients carry out lead-based paint responsibilities directly or through the City's Housing Rehabilitation Program Staff.

Actions planned to reduce the number of poverty-level families

The City does not have a formal antipoverty strategy, but has implemented numerous local and federal job creation and education programs to reduce poverty. In 1993, the citizens of Oklahoma City passed the first Metropolitan Area Projects (MAPS) initiative, a five-year sales tax program to construct or redevelop public facilities that including a downtown library, new arena, minor league baseball stadium, river dams and a canal in Bricktown as well as improvements to the State Fairgrounds. MAPS ultimately cost approximately \$300 million and resulted in over \$2 billion in private investment.

The initial MAPS initiative was followed by a larger "MAPS for Kids" initiative that included new construction and/or renovation of virtually all public school buildings in the Oklahoma City Public School District, and provided significant revenue for improvements in suburban school districts that educate children of Oklahoma City residents. Education serves as the cornerstone of most effective anti-poverty strategies. Currently, state funding for teachers and education continue to lag far behind the national average, resulting in dwindling resources for schools and classrooms. Non-competitive teacher's salaries have led to mass out-migration of qualified educators to neighboring states. This year teacher strikes

led to some salary increase, but our public schools remain chronically underfunded.

The third MAPS initiative was passed in December 2009 and projects are well underway. MAPS 3 provided funding for a seventy (70) acre downtown regional park, a 4.5-mile electric streetcar route, a new downtown convention center (including successful negotiation for an adjoining Omni convention center hotel), neighborhood sidewalks and trails, aquatic centers for seniors, additional improvements to the Oklahoma State Fairgrounds and a white-water course on the Oklahoma River. The exhibition center at the State Fairgrounds was completed and opened during the Second Action Plan Year. The senior centers and the Will Rogers Trail were completed in the Third Action Plan Year. The streetcar route has been finalized and installation of the rail and infrastructure are underway. The streetcars themselves have been constructed and delivered. Operations are expected to begin within the next twelve (12) months. Land acquisition for the downtown Core to Shore Park is complete and environmental studies have been completed. Construction on the Northern phase of the park began in the Summer of 2017. The MAPS funded projects are expected to equitably enhance transportation options, wellness, and quality of life for all residents.

The total public investment in all three MAPS programs is over \$1.8 billion. Discussion of a potential fourth MAPS vote is underway. A new Mayor was elected in early 2018 and his goals and priorities for the City will ultimately impact future programmatic decisions.

In addition to the locally funded economic development and job creation efforts to combat poverty, the City utilizes federal resources to stimulate job growth. The Community Action Agency manages a small business development loan fund capitalized by a \$4 million Section 108 Loan Guarantee. The loan fund was established to make loans to small businesses in the Neighborhood Revitalization Strategy Area. In addition, an economic development revolving loan fund was created in spring 2015 to assist new and expanding businesses in neighborhoods participating in the City's Commercial District Revitalization Program. These funds are available to small businesses and microenterprises in the eligible lending areas; however, demand has been slower than anticipated.

Actions planned to develop institutional structure

The City has formed partnerships with the Chamber of Commerce and area banks to participate in and deliver economic development services and funding. The CAA is funded to conduct an economic development activity and the City directly funds economic development activities with CDBG funds and the Section 108 Loan Guarantee Program. The City's ongoing economic development programs and Section 108 Loan Guarantees include the participation of local lenders which include Bank of Oklahoma, Bank of America, BankOne, First State Bank, Legacy Bank, and InterBank (among others) to assist with the Murrah District Revitalization Program, CAA small business loan program, Current Section 108 Loans, Section 108 Small Business Fund, and Housing assistance to lower-income persons and special populations. Funding is provided through the multiple community partners including OCHA, CAA, NHS, City Care, designated CHDOs, Oklahoma State Department of Commerce, and CEC.

Assisted social service agencies that serve the homeless with shelter, essential services and homeless prevention through the ESG and general funds of the City include YWCA, Be the Change, Upward Transitions, Heartline 211, Central Oklahoma Transportation and Parking Authority (COTPA), Neighborhood Services Organization (NSO), Homeless Alliance, Red Rock Behavioral Health Services, OKC Metro Alliance, HOPE Community Services, Sunbeam Family services, Legal Aid, and City Care.

The City receives assistance in conducting the annual Point-in-Time count from the Homeless Alliance, City Rescue Mission, City Care, Oklahoma City Veterans Administration, Medical Center, The Salvation Army, OKC Metro Alliance, Red Rock Behavioral Health Services, Upward Transitions, Catholic Charities-Sanctuary Women's Development Center, Oklahoma Department of Mental Health and Substance Abuse Services, Sunbeam Family Services, Oklahoma Department of Corrections, Be the Change, Neighborhood Services Organization, NorthCare, Community Health Centers, OKC Metro Transit, Hope House OKC, Jesus House, Heartline 211, Mental Health Association–Oklahoma, Hope Community Services, Grace Rescue Mission, United States Department of Housing and Urban Development-Oklahoma Field Office, YWCA of Oklahoma City, Oklahoma City Police Department Homeless Outreach Unit, Oklahoma City Planning Department Division of Community Development, Oklahoma City Public Schools, Oklahoma Department of Human Services, and Urban League of Greater Oklahoma City.

Actions planned to enhance coordination between public and private housing and social service agencies

The Plan objectives that relate to the homeless and persons with special needs, including persons with HIV/AIDS, focus on program activities designed to provide housing assistance and social services to the underserved populations.

Discussion:

In addition to the above initiatives, direct home ownership assistance is provided with HOME funds to down payment and closing cost assistance provider(s). CDBG funds may be used to provide down payment and closing costs assistance in the SNI Neighborhoods if actual funding exceeds current projections. Funding to the down payment assistance (DPA) provider(s) is targeted at 80%/20% between the NRSA and the remainder of the DPA lending area. The Targeted area generally covers the NRSA, housing construction provided by CHDOs and other non-profit affordable housing developers and any low/mod areas specifically targeted for home ownership funding. The General DPA portion of the program includes low and moderate-income areas contained within a program boundary extending from South 89th Street to Memorial Road, and from Bryant to Meridian Avenues. Please refer to the DPA Program Area Map in the appendices (Appendix 5). CDBG down payment assistance, if provided, will be restricted to the SNI neighborhoods within the NRSA, and eligibility will be determined using the aggregation method.

HOME down payment assistance provides a loan up to \$14,999 based on need that is forgivable at the rate of 1/60th per month over a five-year affordability period to eligible homebuyers. When HOME

funds are utilized for DPA, the maximum sales price of the home cannot exceed 95% of the area median sales price of homes in the jurisdiction. The limits are published annually by HUD and enforced in the City's DPA program.

Program Specific Requirements

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

Introduction:

Program Income (PI)-The City does not anticipate additional CDBG PI prior to June 30, 2018. \$128,863.52 has been received during the Third Action Plan year and is available for reallocation. A total of \$75,000 is anticipated in the Fourth Action Plan Year (2018-19). \$51,296.91 in 2017 recaptured CDBG funds are available for allocation. Oklahoma City does not expect to receive PI during the program year from CDBG capitalized revolving loan funds (RLFs) or float funded activities. CDBG funds capitalized a \$750,000 RLF in 2015; however, no repayments are expected in the Fourth Action Plan Year. Due to slow spending, a portion of these funds were reallocated to other activities. Oklahoma City has not invested CDBG funds in float funded activities. PI that is received will be allocated as follows: 1) PI generated from Section 108 Loan investment and repayment accounts will be used to pay Section 108 principal and interest; 2) PI that is generated by the Oklahoma City Urban Renewal Authority (OCURA) activities during the current program year may be reallocated back to OCURA for use in other CDBG eligible activities; 3) CDBG funding rebates provided by material suppliers from Oklahoma City Housing Assistance Program activities will be allocated to the Oklahoma City Housing Assistance Program to assist with funding additional Housing Exterior Maintenance projects; 4) 20% of all CDBG PI will be used to create additional administrative capacity, and CDBG PI may be used to fund administrative expenses during the program year in which it is realized; and 5) In accordance with CPD Notice 97-9, III.J., HOME PI deposited to the PJ's letter of credit that creates additional administrative capacity may be used by the PJ for administrative expenses incurred during the Action Year, and any excess administrative capacity will be carried forward to subsequent years.

(Continued in "Description of Other Forms of Investment" Section (Item no. 1 Below) due to character limit restrictions)

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

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

- | | |
|--|---------|
| 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed | 203,306 |
| 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan. | 0 |
| 3. The amount of surplus funds from urban renewal settlements | 0 |

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4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	2,797
5. The amount of income from float-funded activities	0
Total Program Income:	206,103

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - The City uses a consecutive period of three years is used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. The Fourth Year AP will begin the first year of the 3-year ratio period.	80.00%

Reference 24 CFR 91.220(l)(2)

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

Continued from Introduction Above....Preceding Program Year Income-Oklahoma City forecasts PI and allocates the forecasted PI in Annual Action Year Plans. All PI is reported in IDIS and in financial reporting to HUD. **Section 108 Proceeds-**Proceeds from Section 108 Loan Guarantees have been utilized to stimulate economic development and create low and moderate-income jobs. All Section 108 Loan Guarantees have been fully disbursed. The Small Business Assistance Section 108 Loan was established to provide access to capital for small businesses located in the NRSA. Proceeds from loan payments and interest earned on all loan repayment accounts associated with the Section 108 Loan Guarantees are used to make debt service payments. **Surplus Funds-** The City of Oklahoma City anticipates a return of approximately \$153,306.70 in 2017-18 CDBG PI prior to the beginning of the Fourth Action Year Plan, with an additional \$75,000 anticipated in 2018-19. A total of \$2,797.41 in 2017-18 recaptured funding is available for allocation. FY 2017-18 HOME PI and unallocated program funds in the amount of \$8,683.44 is available for allocation during the Fourth Action Year Plan with an additional \$122,000 in PI estimated for FY 2018-19. **Grant Funds Returned-**No CDBG funds have been returned to the letter of credit. **Income from Float Funded Programs-**Oklahoma City will not utilize float funding for program activities and therefore no income will come from float funded activities. **Urgent Needs-**No urgent need activities are included in the Fourth Action Year Plan. **Allocation of CHDO Loan Pool Funding to Set-aside activities-** When practicable, CHDO funds may be reallocated from the CHDO loan pool to the CHDO Set-aside activities to ensure timely allocation and efficient use of these resources in the production of affordable units. **NOTE:** In reference to item no. 2 above under the "Other CDBG Requirements" section, the City of Oklahoma City began its 3-year ratio in the First Action Plan Year. The ratio calculation will begin a new three-

year period in this Fourth Action Plan Year covering the years 2018-19; 2019-20; and 2020-21 (70% of a 3- year average beginning in FY 2018-19 as year one).

Unallocated 2017-18 HOME funds in the amount of \$8,683.44 are available to re-allocate. 2018-19 HOME Program Income of \$122,000 is anticipated, of which \$80,000 is estimated to be returned to the CHDO Loan Pool, \$4,200 to HOME program Administration, and \$37,800 to the Affordable Housing Program. No HOME funds from 2017-18 have been recaptured.

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

The Homebuyer Assistance Programs funded by Oklahoma City will utilize the Recapture Method provided in the HOME Regulations at 92.254(a)(5)(ii). Recapture provisions ensure that the participating jurisdiction recoups all or a portion of the HOME assistance to the homebuyers, if the housing does not continue to be the principal residence of the family for the duration of the period of affordability. As the participating jurisdiction, the City of Oklahoma City may structure its recapture provisions based on its program design and market conditions. The period of affordability is based upon the total amount of HOME funds subject to recapture described in paragraph (a)(5)(ii)(A)(5).

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

The City, as the participating jurisdiction, will recoup all or a portion of the HOME assistance to the homebuyers, if the assisted housing is transferred voluntarily or involuntarily during the period of affordability based on the availability of net proceeds. Net proceeds are defined as the sales price minus superior loan repayment (other than HOME funds) and any closing costs. Only the direct subsidy provided to the homebuyer, i.e., down payment and closing cost assistance and/or the difference between the fair market value of the property and a reduced sales price attributable to HOME funds, will be recouped pro-rata based on the forgivable loan terms and on the reduction during affordability period provided in the HOME regulations at 92.254(a)(5)(ii)(A)(2).

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

The City of Oklahoma City does not anticipate using HOME funds during the Fourth Action Plan year to refinance existing debt secured by multifamily housing.

**Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)

One-time prevention assistance for rent/utilities and coordinated case management services for families and individuals may be provided to qualified individuals and families using ESG funds. Legal assistance during eviction court proceedings is offered to assist and advocate for people who would face eviction from their home without this assistance.

Services planned: Expansion of rapid re-housing and prevention assistance depending on availability of funds.

How persons access/receive assistance: 211 provides information and referral to social service and housing providers. Networking and education for providers is conducted through the monthly meeting of the Coalition To End Poverty. The purpose is to make sure that providers are knowledgeable about services in the community, which ensures that people needing services find “no wrong door” to accessing services.

A complete copy of the current ESG policies and procedures manual is attached (Appendix 8).

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The City works with numerous nonprofit social service providers through the Continuum of Care (CoC) program. The CoC Committee coordinates the City's homeless assistance programs and the development of the City's annual CoC grant application. The City conducts an annual Point-in-Time (PIT) count of the homeless in January of each year. Data gathered through this effort, coupled with consultation with local homeless service providers was used to develop the City's homeless strategy. While not the definitive measure to count the homeless population; this snapshot count provides information about current trends, and helps to identify gaps in services and housing. Oklahoma City has focused on housing for individuals who are chronically homeless through funding from the HUD CoC competitive grant and a commitment of matching HOME funding. The City, through community partnerships has worked to create permanent supportive housing beds in its effort to eliminate homelessness.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

ESG funds are awarded through an Open Solicitation process. The Continuum of Care Committee makes recommendations for funding. These recommendations are then 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 housing assistance and services to the homeless.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The City of Oklahoma City expects to meet the homeless participation requirements in 24 CFR 576.405; therefore, no outreach plan is needed.

5. Describe performance standards for evaluating ESG.

Eligible Applicants: Applicants must be private nonprofit (registered 501c3) organizations and must demonstrate sufficient capacity.

Eligible Activities: Applications can include one or more of the eligible ESG activities: Street outreach, emergency shelter, Homeless prevention TBRA and Housing Relocation and Stabilization Services, Rapid re-housing, and/or centralized intake.

The City of Oklahoma City offers a “no wrong door” approach, with providers being well linked to available resources through networking connections gained via the Coalition To End Poverty. In addition to this, 211 is the information and referral agency which provides information about eligibility and referrals to service agencies. 211 conducts public awareness campaigns throughout the year with public service advertisements located on television, radio, on city buses and signage. People are linked to public benefits through provider agencies. All agencies have received training in helping people apply for benefits through Social Security and Medicaid. This training was conducted through the SSI/SSDI Outreach, Access and Recovery grant (SOAR). In 2013, the City of Oklahoma City also joined the 100,000 Homes Campaign in an effort to move the most medically frail, chronically homeless individuals into permanent housing using a housing first approach. To accomplish this, members of the chronically homeless population are given a vulnerability index survey to determine their health issues. Those determined to be the most medically frail are prioritized for immediate placement into housing. A case management committee comprised of various service providers assigns a case manager as needed. The provider that the case manager is affiliated with is dependent on the needs of the individual being housed. Since joining the 100,000 Homes Campaign at the beginning of 2013, local non-profit service

providers have collaborated to house over 750 chronically homeless individuals, exceeding their goal by more than 40%.

Discussion: ESG Policies and Procedures are attached (**Appendix 8**)

Attachments Grantee Unique appendices

APPENDIX 1

CONSOLIDATED PLAN TIMELINE

**TENTATIVE CALENDAR FOR THE
2018-19 CONSOLIDATED PLAN FOURTH ACTION YEAR**

2017

- December 4 Identify and reserve facilities for public meetings in mid-January
- December 19 Submit *Notice of Public Hearing*/planning input session to OPUBCO prior to the Holidays
- December 22 *Notice of Public Hearing* published for public hearing/planning input sessions to be held at *Sunbeam Family Services* at 6:00 pm, January 9, 2018 and 3:00 pm January 11, 2018

2018

- January 9 Conduct public hearing/planning input session, 6:00 p.m. (Sunbeam Family Services)
- January 11 Conduct public hearing/planning input session, 3:00 p.m. (Sunbeam Family Services)
- March 6 Citizens Committee for Community Development meeting presentation to discuss feedback from citizen input meetings, anticipated funding available, and funding priorities for the 2018-19 Consolidated Plan Fourth Action Year; and to approve preliminary funding recommendations for consideration by the Neighborhood Conservation Committee.
- March 8 CD Staff to finalize funding priorities and recommendations for presentation to NCC
- March 13 Consideration of preliminary funding recommendations by the Neighborhood Conservation Committee
- May 1 Final allocations announced by HUD
- May 11 Combined Notice to be submitted to OPUBCO for publication (*Combined Notice for 30-day comment period and Notice of Public Hearing at Council on 4/24*)
- May 9 Publication of Combined Notice of 30-day comment period and Notice of Public Hearing.
- May 15 Consideration by the Citizens Committee for Community Development of final funding recommendations for consideration by the Neighborhood Conservation Committee.
- June 1 Written public comments due to Staff by 5:00 p.m.
- June 5 Special meeting. Consideration of final funding recommendations by the Neighborhood Conservation Committee.
- June 8 Begin routing process for documents in SIRE. Note: Must have a complete draft of the AP Report completed for public review.
- June 12 Clerk's office deadline for June 19th City Council meeting. (*must include a near final draft of the plan that will be submitted to HUD*).
- June 19 City Council public hearing and action on the Consolidated Plan Fourth Action Year
- June 30 Submit 2018-19 Consolidated Plan Fourth Action Year to HUD (*Historically due to HUD no later than May 15th; however, date has been extended to 60 days after allocation announcements (5/1/18) due to the delay in funding notifications.*).

APPENDIX 2

CITIZEN PARTICIPATION COMMENTS

2018-19 FOURTH ANNUAL ACTION YEAR PLAN

Public Meeting #1 (6:00 p.m. January 9, 2018)

Sunbeam Family Services

1100 NW 14th St

Oklahoma City, OK 73106

Attendees: 11 (3 community members, 8 staff members)

Comment: The National Association of Realtors is lobbying to maintain CDBG funding.

Staff responded that these efforts are appreciated.

Question: Is the money provided for abandoned housing board-ups returned to the City?

Staff responded that these funds are reimbursed to CDBG as program income when liens are paid and released.

Question: How much funding did the Oklahoma City Economic Development Alliance receive last year?

Staff responded that the Oklahoma City Urban Renewal Authority (OCURA) is our subrecipient for these funds which are then contracted out. OCURA received an allocation of \$609,793 for affordable housing development and an additional \$788,880 for acquisition and clearance for blighted properties in urban renewal areas. Additional funding was allocated last year to assist with infrastructure improvements to support a Stonewall street extension project near the Page Woodson redevelopment.

Follow-up Question: Could OCURA do an RFP for these properties?

Staff responded that OCURA did issue RFPs for development of sites acquired using CDBG funds. It was also noted that OCURA just issued an RFP for another project supported with HOME funds, and a contract was awarded to Progress OKC.

Comment: Concern noted about the relationship between OCURA and Progress OKC operating under the same organizational umbrella.

Staff responded that the project was awarded through competitive bids with a process open to all interested parties. OCURA and Progress OKC are separate organizations, each with their own independent Board of Commissioners/Directors. OCURA received two responses to the RFP for development of homes along Euclid Avenue and of the two, Progress OKC was more experienced in the development of similar projects and in the use of similar funding sources.

Question: What is the timeframe to fully expend CDBG and HOME funds?

Staff responded that there are timelines for the use of HUD funds. The City develops a timeline for spending in the contract agreement. Generally, funds are required to be spent within 18-24 months depending on the construction timeline in the contract. Contracts do include clawback provisions and if the projects are not completed timely, the City could require funds to be returned.

Question: Is the Downpayment Assistance cap for homebuyers set by HUD or by the City?

Staff responded that the City follows our internal policy for the Down Payment Assistance Program which caps assistance at \$15,000. Per the federal HUD rules, if assistance is provided in excess of \$15,000, it would trigger an affordability period and monitoring requirement of ten (10) years rather than five (5).

Follow-up comment: The City should consider additional assistance and longer affordability periods to prevent property flipping and to encourage families to remain in the neighborhood longer.

Another commenter shared an opinion that life changes frequently dictate when a family moves more than the affordability does; for example, aging in place, growing families, and unexpected health or financial challenges. Staff noted an additional five (5) year requirement might require a family to pay back some funds when they sold their house or sell to another qualifying family, but would not ensure long term residency beyond the minimum affordability period.

Question: Can you provide more information about the Commercial District loan fund?

Staff responded that the fund was created a couple years ago to provide loans to small business startups and microenterprises in specified commercial districts. The fund was established with an allocation of CDBG funds in the amount of \$750,000. Spending has been very slow to date and only one loan has been made. Recently, because of HUD concerns about timely spending, The City amended our Action Plan and re-allocated \$450,000 to other activities that are expected to spend more quickly and allow us to meet our regulatory expenditure guideline. Funds are not used for the establishment of a commercial district, rather for the creation of new businesses or the expansion of existing businesses. Funds are flexible and can be used for things such as acquisition, improvements or renovations, furniture/fixtures/ equipment, remodeling, working capital, and related soft costs.

Follow-up Question: Are applicants for the loan fund required to live in Oklahoma City?

Staff responded that residency is not required; however, the business must be within the eligible lending area identified in the RLF Policy and Procedures.

Follow-up Question: Can we see where funds are being spent in the Commercial Districts?

Staff responded, yes, this is public information.

Question: The SNI slide indicated there will be approximately \$1.5 million allocated to SNI Neighborhoods. Is that correct?

Staff responded that this has been a historical average. HUD has not yet announced funding for this program year and the budget has not yet been determined.

Question: What would staff perceive as the five top benefits achieved in the existing SNI Neighborhoods?

Staff responded that the greatest achievements have been the development of neighborhood organizational capacity, new housing construction in formerly blighted neighborhoods, construction of sidewalks and streetscape transformation, the establishment of the STEAM afterschool programs, and the provision of down payment assistance and neighborhood grants.

Email Correspondence: Request to provide a breakdown of OCURA funding for the 2017-18 Third Action Plan year, explanation of how the \$788,000 allocation was used, and a breakdown of project vs. administrative costs.

Staff responded by providing a copy of last year's Operating Agreement with the Subrecipient, a copy of the City Council Memo and Council Resolution awarding the funding, and explanation of the program administration and program delivery expenses associated with the activity.

2018-19 FOURTH ANNUAL ACTION YEAR PLAN

Public Meeting #2 (3:00 p.m. January 11, 2018)

Sunbeam Family Services

1100 NW 14th St

Oklahoma City, OK 73106

Attendees: 18 (8 community members, 10 staff members)

Question: Is CoC (Continuum of Care) funding included with ESG and HOPWA?

Staff responded that CoC is not part of The City's federal allocations addressed in the Consolidated Plan. Instead, the CoC funds must be applied for and are awarded annually on a competitive basis. We include information about the CoC accomplishments in our Consolidated Plan and CAPER reports but these funds are not included in our formula grants.

Comment: The SNI success should be espoused. Very glad that Capitol Hill has been selected as a new SNI neighborhood.

Staff responded that we have been very pleased with our accomplishments in the three inaugural neighborhoods and look forward to duplicating this success in the newly selected neighborhoods.

Question: Will SNI continue in the Classen Ten Penn neighborhood?

Staff responded that although CTP is a 'graduating' neighborhood and SNI is winding down here, activities that are planned or started, such as the McKinley park renovations, will continue in Classen Ten Penn.

Question: Has there been equal improvement in the SNI neighborhoods in violent verse non-violent crime?

Staff responded that this isn't tracked; however, anecdotally, violent crime appears to be decreasing.

Question: What is the status of the improvements at McKinley Park?

Staff responded that the sidewalks on the north side are being extended around the splash pad and basketball court. Playground improvements are underway. Tree plantings, installation of benches, and additional lighting are planned.

Question: How many SNI neighborhoods have there been to date?

Staff responded that there have been three neighborhoods designated as SNI neighborhoods by the City, and two additional neighborhoods were recently selected for future support. SNI activities will continue in the Classen Ten Penn this year and the Culbertson's East Highlands neighborhood for the next SNI cycle. Private investment in Classen's North Highland Parked neighborhood has reached an acceptable level and public assistance is no longer required. This fourth year Action Plan will allocate resources for SNI activities in the Capital Hill and Capital View neighborhoods. Neighborhood collaboration and organizational efforts are now underway.

APPENDIX 3
GLOSSARY OF TERMS

Glossary

ACOG	Association of Central Oklahoma Governments
ACS	American Community Survey
ADA	Americans with Disabilities Act
AHDP	Affordable Housing Development Program
AI	Analysis of Impediments
AMI	Area Median Income
AMP	Asset Management Projects
CAA	Community Action Agency
CAPER	Consolidated Annual Performance and Evaluation Report
CCCD	Citizen's Committee for Community Development
CDBG	Community Development Block Grant
CDBG-R	Community Development Block Grant Recovery Program
CDRP-B	Commercial District Revitalization Program-Business
CEC	Community Enhancement Corporation
CHAS	Comprehensive Housing Affordability Strategy
CHDO	Community Housing Development Organization
CITY	City of Oklahoma City
CoC	Continuum of Care
COTPA	Central Oklahoma Transportation and Parking Authority
CUDI	Central Urban Development, Inc.
DHS	Department of Human Services
CPMP	Consolidated Plan Management Process
DEQ	Department of Environmental Quality
DOT	Department of Transportation
DPA	Down Payment Assistance
ED	Economic Development
EMSA	Emergency Medical Services Authority
EPA	Environmental Protection Agency
ESG	Emergency Solutions Grant
ESMA	Eligible Statistical Metropolitan Area
FSS	Family Self-Sufficiency
GE	General Electric company
HAMFI	Household Area Median Family income
HCDA	Housing and Community Development Act
HIV/AIDS	Human Immunodeficiency Virus infection/Acquired Immune Deficiency Syndrome
HMIS	Homeless Management Information System
HOME	Home Investment Partnerships Program
HOPWA	Housing Opportunities for Persons With Aids

HPRP	Homelessness Prevention Rapid Rehousing Program
HTF	Housing Trust Fund
HUD	Housing and Urban Development
LIHTC	Low Income Housing Tax Credits
MAPS	Metropolitan Area Projects
MSA	Metropolitan Statistical Area
NCC	Neighborhood Conservation Committee
NHS	Neighborhood Housing Services
NIMBY	Not In My Backyard
NRSA	Neighborhood Revitalization Strategy Area
NSO	Neighborhood Services Organization
NSP	Neighborhood Stabilization Program
OCHA	Oklahoma City Housing Authority
OCURA	Oklahoma City Urban Renewal Authority
ODOC	Oklahoma Department of Commerce
OG&E	Oklahoma Gas and Electric company
OHFA	Oklahoma Housing Finance Agency
OSDH	Oklahoma State Department of Health
PHA	Public Housing Authority
PIC	PIH Information Center
PIH	Public and Indian Housing
PIT	Point In Time
RFP	Request for Proposals
SNI	Strong Neighborhoods Initiative
SOAR	SSI/SSDI Outreach, Access & Recovery
SPDAT	Service Prioritization Decision Assistance Tool
SRO	Single Room Occupancy
SSI/SSDI	Supplemental Security Income/Social Security Disability Income
SSVF	Supportive Housing for Veteran's Families
STRMU	Short Term Rent Mortgage and Utility assistance
TA	Technical Assistance
TBRA	Tenant Based Rental Assistance
TIF	Tax Increment Financing
VA	Veteran's Administration
VASH	Veterans Affairs Supportive Housing
WIC	Women, Infants and Children
YWCA	Young Women's Christian Association

APPENDIX 4

ANNUAL OBJECTIVES TABLE

Consolidated Plan Objectives

Decent Housing Activity Objectives Descriptions

**2018-2019
Objective**

<i>Quality of Affordable Owner-Occupied Housing</i>	
Housing Assistance Program- Whole House Rehab (HOME)	20
Housing Exterior Maintenance Program and (CDBG)	45
Storm Shelter Program	10
CAA Emergency Home Repair Program (CDBG)	100
SNI Whole House Rehabs (HOME)	7
<i>Quality of Public Housing</i>	
Rehabilitation of Public Housing Units (CDBG)	10
<i>Affordability of Owner-Occupied Housing</i>	
Targeted Area Down Payment Assistance (HOME)	23
Non-Target Area Down Payment Assistance (HOME)	10
<i>Supply of Affordable Owner-Occupied Housing</i>	
CHDO Set-Aside-New Construction of Single Family Homes (HOME-SNI)	8
OCURA Affordable Housing Development (CDBG/HOME)	5
Non-Profit Housing Construction- SNI (HOME) 1	0
<i>Supply of Affordable Rental Housing</i>	
First Step SRO's	9
Winds House Rehabilitation (CDBG)	4
<i>Supply of Affordable Housing for Homebuyers and Acquisition/Rehab for Homebuyers</i>	
None	0

<i>Availability of Housing for Persons with HIV/AIDS</i>	
Short Term Rent, Mortgage, and Utility Assistance to Prevent Homelessness (HOPWA)	115
Tenant Based Rental Assistance to Prevent Homelessness (HOPWA)	30
<i>Supportive Housing for the Chronically Homeless</i>	
Housing and Case Management Resources for the Chronically Homeless, Families and Veterans (ESG)	50
<i>Sustainability of Transitional Housing</i>	
Reduce evictions for individuals and families by providing legal services (ESG)	150
<i>Provision of Emergency Shelter and services for at-risk populations</i>	
Provide shelter and outreach services to homeless youth and seniors, victims of domestic violence, and individuals with mental illness (ESG)	600
Provide health care services to low income and homeless individuals (ESG)	1500
<i>Housing Opportunity for Homeless Households with Children</i>	
Provide Rapid Re-Housing and Prevention Services for Homeless Households With Children (ESG)	80

Suitable Living Environment Activity Objectives Description	2018-2019 Objective
--	----------------------------

<i>Improve quality and sustainability of neighborhood health</i>	
Funds to trim and/or remove hazardous trees that pose a threat to personal and public safety in the SNI neighborhoods (CDBG)	20
<i>Services for Homeless Youth</i>	
Development of a Drop-In Center for Homeless Youth (ESG) (<i>In Planning</i>)	1
<i>Public Facilities, Services, and Infrastructure Improvements</i>	
Funds to provide legal ownership assistance to homeowners and non-profits (CDBG)	10

Funds to provide sidewalks and infrastructure within the SNI neighborhoods (CDBG)	0
Tree Planting in SNI neighborhoods (CDBG)	50
Funds to support park improvements in SNI neighborhoods (CDBG) 2	2
Metro Better Living Center	1
First Step SRO's- Utilities	1
Red Andrews Park Improvements-Public Art Project	1
<i>Strengthen Neighborhood Capacity</i>	
SNI Neighborhood-led improvement projects (CDBG)	3
Funds to support after-school tutoring and enrichment programs for students in the two (2) SNI elementary schools (CDBG)	250
<i>Acquisition/Clearance of Vacant, Blighted Property</i>	
Urban Renewal Authority- Acquisition, Disposition, Relocation, and Completion to Address Slum and Blight (CDBG)	1
<i>Graffiti Removal</i>	
Remove Graffiti in Low-Moderate Income Neighborhoods to Prevent Crime (CDBG)	450
<i>Transportation Options for Special Needs Population</i>	
COTPA (EMBARC) Share-A-Fare Program-Subsidized Bus and Taxi Service for Special Needs Population (CDBG)	15,350
<i>Address Slum and Blight</i>	
Secure Vacant and Abandoned Properties (CDBG)	100
<i>Sustainability of Service Provider Facilities</i>	
Community Development Public Facilities Program (CDBG)- <i>Projects not yet fully vetted</i>	1

Economic Opportunity Objectives Description

<i>Economic Opportunities for Low and Moderate Income Residents (4)</i>	
CAA Small Business Services Program- Technical Assistance (CDBG)	125
Commercial District Revitalization Program for Businesses-Economic Development Revolving Loan Fund. (CDBG)	2

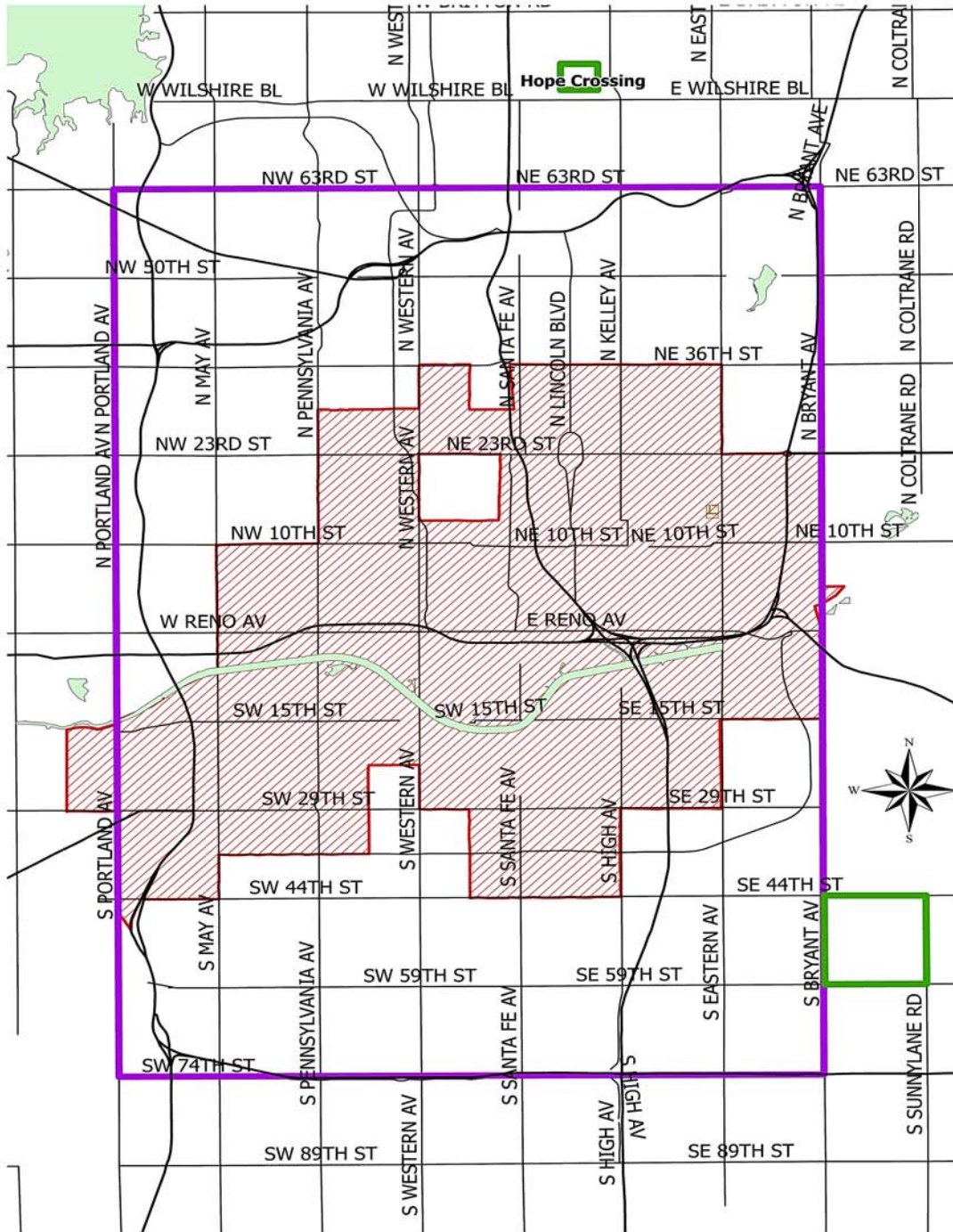
APPENDIX 5

DOWNPAYMENT ASSISTANCE PROGRAM

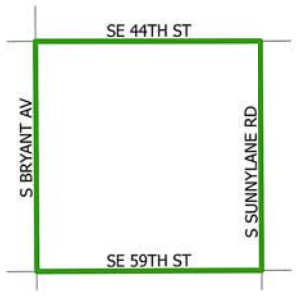
BOUNDARIES

OKLAHOMA CITY DOWN PAYMENT ASSISTANCE PROGRAM GUIDELINES

EXHIBIT 1



INSET A



- Target Area DPA Program
- General Program Boundary
- NRSA Area Program



The City of
OKLAHOMA CITY
 Planning Department
 Housing and Community Development Division

APPENDIX 6

SF-424 AND CERTIFICATIONS (COPIES)

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- Preapplication
 Application
 Changed/Corrected Application

*** 2. Type of Application:**

- New
 Continuation
 Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

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

*** c. Organizational DUNS:**

d. Address:

* Street1:

Street2:

* City:

County/Parish:

* State:

Province:

* Country:

* Zip / Postal Code:

e. Organizational Unit:

Department Name:

Division Name:

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

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

Title:

Organizational Affiliation:

* Telephone Number:

Fax Number:

* Email:

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

*** Other (specify):**

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

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

Community Development Block Grants/Entitlement Grants

*** 12. Funding Opportunity Number:**

*** Title:**

13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

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

Community Development Block Grant (CDBG) program activities.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

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

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="4,901,496.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value="2,797.41"/>
* f. Program Income	<input type="text" value="228,306.70"/>
* g. TOTAL	<input type="text" value="5,132,600.11"/>

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

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

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

- Yes
- No

If "Yes", provide explanation and attach

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

** I AGREE

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

Authorized Representative:

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:

* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 01/31/2019

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


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

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

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

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

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205)
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
The City of Oklahoma City	7/31/18

Application for Federal Assistance SF-424

* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
---	---	--

* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text"/>
--	---

5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>
---	--

State Use Only:

6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>
--	--

8. APPLICANT INFORMATION:

* a. Legal Name: <input type="text" value="The City of Oklahoma City"/>	
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="736005359"/>	* c. Organizational DUNS: <input type="text" value="0141047770000"/>

d. Address:

* Street1:	<input type="text" value="420 W. Main St."/>
Street2:	<input type="text" value="Suite 920"/>
* City:	<input type="text" value="Oklahoma City"/>
County/Parish:	<input type="text" value="Oklahoma"/>
* State:	<input type="text" value="OK: Oklahoma"/>
Province:	<input type="text"/>
* Country:	<input type="text" value="USA: UNITED STATES"/>
* Zip / Postal Code:	<input type="text" value="73102-4437"/>

e. Organizational Unit:

Department Name: <input type="text" value="Planning Department"/>	Division Name: <input type="text" value="Community Development Division"/>
---	--

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

Prefix: <input type="text"/>	* First Name: <input type="text" value="Aubrey"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="McDermid"/>	
Suffix: <input type="text"/>	
Title: <input type="text" value="Planning Director"/>	
Organizational Affiliation: <input type="text" value="The City of Oklahoma City"/>	
* Telephone Number: <input type="text" value="(405) 297-1629"/>	Fax Number: <input type="text" value="(405) 297-3796"/>
* Email: <input type="text" value="Aubrey.McDermid@okc.gov"/>	

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

*** Other (specify):**

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

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnerships Program (HOME)

*** 12. Funding Opportunity Number:**

*** Title:**

13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

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

HOME Investment Partnerships Program (HOME) activities.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a Applicant

* b. Program/Project

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

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a Federal	<input type="text" value="2,482,884.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value="130,683.44"/>
* g TOTAL	<input type="text" value="2,613,567.44"/>

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

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

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

- Yes
- No

If "Yes", provide explanation and attach

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

** I AGREE

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

Authorized Representative:

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:

* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 01/31/2019

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


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

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

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

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

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION The City of Oklahoma City	DATE SUBMITTED 7/31/18

Application for Federal Assistance SF-424

* 1. Type of Submission <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s) <input type="text"/> * Other (Specify) <input type="text"/>
--	---	--

* 3. Date Received: <input type="text"/>	4 Applicant Identifier: <input type="text"/>
--	--

5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>
---	--

State Use Only:

6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>
--	--

8. APPLICANT INFORMATION:

* a. Legal Name: <input type="text" value="The City of Oklahoma City"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="736005359"/>	* c. Organizational DUNS: <input type="text" value="0141047770000"/>	

d. Address:

* Street1:	<input type="text" value="420 W. Main St."/>
Street2:	<input type="text" value="Suite 920"/>
* City:	<input type="text" value="Oklahoma City"/>
County/Parish:	<input type="text" value="Oklahoma"/>
* State:	<input type="text" value="OK: Oklahoma"/>
Province:	<input type="text"/>
* Country:	<input type="text" value="USA: UNITED STATES"/>
* Zip / Postal Code:	<input type="text" value="73102-4437"/>

e. Organizational Unit:

Department Name: <input type="text" value="Planning Department"/>	Division Name: <input type="text" value="Community Development Division"/>
---	--

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

Prefix: <input type="text"/>	* First Name: <input type="text" value="Aubrey"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="McDermid"/>	
Suffix: <input type="text"/>	
Title: <input type="text" value="Planning Director"/>	
Organizational Affiliation: <input type="text" value="The City of Oklahoma City"/>	
* Telephone Number: <input type="text" value="(405) 297-1629"/>	Fax Number: <input type="text" value="(405) 297-3796"/>
* Email: <input type="text" value="Aubrey.McDermid@okc.gov"/>	

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

*** Other (specify):**

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

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.231

CFDA Title:

Emergency Solutions Grants Program

*** 12. Funding Opportunity Number:**

*** Title:**

13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

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

Emergency Solutions Grants (ESG) Program activities.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a Applicant

* b. Program/Project

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

17. Proposed Project:

* a Start Date

* b End Date:

18. Estimated Funding (\$):

* a Federal	<input type="text" value="394,559.00"/>
* b Applicant	<input type="text" value=""/>
* c State	<input type="text" value=""/>
* d Local	<input type="text" value=""/>
* e Other	<input type="text" value=""/>
* f Program Income	<input type="text" value=""/>
* g TOTAL	<input type="text" value="394,559.00"/>

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

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

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

- Yes
- No

If "Yes", provide explanation and attach

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

** I AGREE

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

Authorized Representative:

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:

* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 01/31/2019

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


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

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

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

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

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION The City of Oklahoma City	DATE SUBMITTED 7/31/18

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- Preapplication
- Application
- Changed/Corrected Application

*** 2. Type of Application:**

- New
- Continuation
- Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

The City of Oklahoma City

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

736005359

*** c. Organizational DUNS:**

0141047770000

d. Address:

*** Street1:**

420 W. Main St.

Street2:

Suite 920

*** City:**

Oklahoma City

County/Parish:

Oklahoma

*** State:**

OK: Oklahoma

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

73102-4437

e. Organizational Unit:

Department Name:

Planning Department

Division Name:

Community Development Division

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

Prefix:

*** First Name:**

Aubrey

Middle Name:

*** Last Name:**

McDermid

Suffix:

Title:

Planning Director

Organizational Affiliation:

The City of Oklahoma City

*** Telephone Number:**

(405) 297-1629

Fax Number:

(405) 297-3796

*** Email:**

Aubrey.McDermid@okc.gov

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

*** Other (specify):**

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

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.241

CFDA Title:

Housing Opportunities for Persons With AIDS

*** 12. Funding Opportunity Number:**

*** Title:**

13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

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

Housing Opportunities for Persons With AIDS (HOPWA) Program activities.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a Applicant

* b. Program/Project

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

17. Proposed Project:

* a Start Date

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="702,611.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="702,611.00"/>

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

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- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
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*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes No

If "Yes", provide explanation and attach

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

** I AGREE

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

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:

* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 01/31/2019

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


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

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
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13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
The City of Oklahoma City	7/31/18

CERTIFICATIONS

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

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

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

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

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

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.


Signature of Authorized Official

7-31-18
Date

Title : Mayor

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2018, 2019 and 2020 [a period specified by the grantee of one, two or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.


Signature of Authorized Official


Date

Title: Mayor

OPTIONAL Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

David Holt
Signature of Authorized Official

7-31-18
Date

Title : Mayor

Specific HOME Certifications

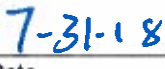
The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;


Signature of Authorized Official


Date

Title : Mayor

Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

Major rehabilitation/conversion/renovation – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

Matching Funds – The recipient will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

Discharge Policy – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

David Holt

Signature of Authorized Official

7-31-18

Date

Title : Mayor

Housing Opportunities for Persons With AIDS Certifications

The HOPWA grantee certifies that:


Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.



Signature of Authorized Official



Date

Title: Mayor

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

APPENDIX 7
CITY COUNCIL RESOLUTION

RESOLUTION

RESOLUTION APPROVING THE 2018-2019 CONSOLIDATED PLAN FOURTH ACTION YEAR PLAN, AND APPROVING NEW FORMULA GRANT FUNDING ALLOCATIONS FOR THE COMMUNITY DEVELOPMENT BLOCK GRANT \$4,901,496; THE HOME INVESTMENT PARTNERSHIPS PROGRAM \$2,482,884; EMERGENCY SOLUTIONS GRANT PROGRAM \$394,559; THE HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS \$702,611; AND PROVIDING FOR THE ALLOCATION OF ESTIMATED COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM INCOME AND PROGRAM FUNDS RECAPTURED FROM PRIOR YEARS OF APPROXIMATELY \$156,104.11 AND HOME INVESTMENT PARTNERSHIPS PROGRAM INCOME AND ESTIMATED PROGRAM FUNDS RECAPTURED FROM PRIOR YEARS OF APPROXIMATELY \$8,683.44; AND PROVIDING FOR THE ALLOCATION OF 2018-2019 COMMUNITY DEVELOPMENT BLOCK GRANT ESTIMATED PROGRAM INCOME OF \$75,000 AND ESTIMATED 2018-2019 HOME INVESTMENT PARTNERSHIPS PROGRAM INCOME OF \$122,000; APPROVING APPLICATION DOCUMENTS AND CERTIFICATIONS, U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD) GRANT AGREEMENTS AND OPERATING AGREEMENTS WITH SUB-GRANTEES, INCLUDED IN ATTACHMENT "A", INCLUDING THE COMMUNITY ACTION AGENCY, COMMUNITY HEALTH SERVICES, INC., OKLAHOMA CITY URBAN RENEWAL AUTHORITY, OKLAHOMA CITY HOUSING AUTHORITY, METROPOLITAN FAIR HOUSING COUNCIL, AND CENTRAL OKLAHOMA TRANSPORTATION AND PARKING AUTHORITY; PROVIDING INTEREST EARNINGS ON UNEXPENDED SECTION 108 LOAN ACCOUNTS SHALL BE USED FOR DEBT SERVICE ON SECTION 108 LOANS; AND AUTHORIZING EXECUTION OF NECESSARY DOCUMENTS.

WHEREAS, The City of Oklahoma City (City) has received allocations of Community Development Block Grant (CDBG) funds since 1975, Home Investment Partnerships Program (HOME) funds since 1992, and Emergency Solutions Grant (ESG) funds since 1987 to primarily benefit persons of low income; and

WHEREAS, the U.S. Department of Housing and Urban Development (HUD) has been providing a direct allocation of Housing Opportunities for Persons with AIDS (HOPWA) grant funds to the City since FY 2000-01; and

WHEREAS, it is the policy of The City of Oklahoma City to commit the use of these funds in the most efficient way possible to meet the needs of its lower-income populations; and

WHEREAS, the City desires to execute operating agreements to implement the direct funding allocations to sub-grantees named in Attachment "A"; and

WHEREAS, federal regulations set forth requirements governing the expenditure of funds, set certain ratios and set-asides of funds to ensure direct benefit to persons of lower-income, and allow certain flexibility in those requirements for the area designated by HUD as the Neighborhood Revitalization Strategy Area (NRSA); and

WHEREAS, FY 2018-19 will be the first year of a three-year averaging period to achieve the requirement to spend 70% of CDBG funds to benefit low/moderate income persons, except as otherwise allowed in a NRSA; and

WHEREAS, the final FY 2018-19 formula grant allocations from the U.S. Department of Housing and Urban Development, have been announced and federal public participation requirements must be adhered to;

NOW, THEREFORE, BE IT RESOLVED BY the Mayor and Council of The City of Oklahoma City:

1. The proposed 2018-19 Consolidated Plan Fourth Action Year Plan is adopted for the period July 1, 2018 through June 30, 2019.
2. The allocations of funds for the Community Development Block Grant and HOME Investment Partnerships Program, Emergency Solutions Grant, Housing Opportunities for Persons with AIDS program, program income, and recaptured funds from prior years attached hereto and reflected in the Fourth Action Year Plan are approved.
3. The Mayor is authorized to execute the application documents, to make the required certifications, and to execute the HUD grant agreements.
4. The Mayor is authorized to execute operating agreements with sub-grantees to whom funds have been allocated in Attachment "A" that include the Community Action Agency, Community Health Services, Inc., Oklahoma City Urban Renewal Authority, Oklahoma City Housing Authority, Metropolitan Fair Housing Council and Central Oklahoma Transportation and Parking Authority.
5. The Mayor is authorized to sign Requests for Release of Funds forms which includes certification of environmental compliance required by 24 CFR Part 58 for projects that may be funded with HUD dollars.
6. The Mayor and/or his designee, the Community Development Division manager in The City of Oklahoma City Planning Department, is authorized to sign documents certifying that a project is in conformance with the Consolidated Plan.

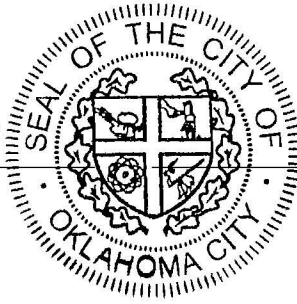
PROVIDED that copies of the executed application and related documents are filed with the City Clerk's Office; and

PROVIDED that the Mayor will not sign any agreement or contract pursuant to such awards that is not herein authorized without first securing the specific approval of the City Council.

ADOPTED by the Council and **APPROVED** by the Mayor of The City of Oklahoma City this 17th day of July, 2018.

ATTEST: [SEAL]

Travis Kersey
CITY CLERK



David Holt
MAYOR

REVIEWED FOR FORM AND LEGALITY

Paul Brunst
ASSISTANT MUNICIPAL COUNSELOR

ATTACHMENT "A"

FUNDING RECOMMENDATIONS

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)

Sources of Funds

Community Development Block Grant 2018-19	\$4,901,496.00
Estimated Recaptured Funds	\$2,797.41
Unprogrammed Funds (2017-18)	\$0.00
Estimated Program Income (2017-18)	306.70
Estimated Program Income (2018-19)	\$75,000.00
Total Sources of CDBG Funds	\$5,132,600.11

HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME)

Sources of Funds

Home Investment Partnerships Program 2018-19	\$2,482,884.00
Recaptured Program Funds	\$0.00
Unprogrammed Funds (2017-18)	\$8,683.44
Estimated Program Income (2017-18)	\$0.00
Estimated Program Income (2018-19)	\$122,000.00
Total Sources of HOME Funds	\$2,613,567.44

EMERGENCY SOLUTIONS GRANT PROGRAM (ESG)

ESG funds allocated for 2018-19	\$394,559.00
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HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS (HOPWA)

HOPWA funds allocated for 2018-19	\$702,611.00
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APPLICATIONS OF FUNDS

New Allocations for the 2018-19 Fourth Action Year are:

CDBG:

Decent Housing

Oklahoma City Housing Assistance Program	\$1,184,000.00
Oklahoma City Housing Authority	\$234,897.00
Community Action Agency (CAA) Emergency Home Repair	\$687,242.00

Suitable Living Environment

Strong Neighborhoods Initiative	\$856,718.11
COTPA (Embark) Share-A-Fare	\$102,842.00
Community Action Agency Graffiti Removal	\$15,011.00
Oklahoma City Abandoned Housing	\$68,562.00
STEAM Academy-E. Fields Elementary	\$60,000.00
Community Health Services, Inc.-Healing Hands PS	\$60,000.00
Parks Summer Youth Programs	\$40,000.00

Economic Opportunity

Community Action Agency Small Business Services	\$39,149.00
Urban Renewal Authority	\$788,880.00

Administration

Metropolitan Fair Housing Council	\$82,745.00
Planning	\$60,000.00
Administration	\$852,554.00

TOTAL ALLOCATION OF CDBG FUNDS **\$5,132,600.11**

**TOTAL ALLOCATION OF CDBG FUNDS
PRIOR YEAR CDBG PROJECTS/ACTIVITIES TO BE CARRIED
FORWARD TO 2018-19 ALONG WITH ANY REMAINING FUNDS:**

- Oklahoma City Housing Assistance Program
- Community Action Agency Emergency Home Repair
- OCURA Affordable Housing Development
- OCURA Low Mod Activities
- OCURA Acquisition/Remediation
- CDBG Affordable Housing Rehab Program
- AIDS Support Program Winds House Rehabilitation
- Kiwanis Head Start
- Metro Better Living Facility
- Metro Alliance First Step SRO Utilities project
- Metro Alliance First Step Men's Lodge-SRO Public Facilities Site Improvements
- Public Art-Red Andrews Park project
- Strong Neighborhoods Initiative Program
- CDBG Community Development Facilities Program Projects-Unallocated
- CDBG Economic Development Commercial District Revolving Loan Fund
- Section 108 Loan Repayment

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

Community Action Agency Small Business Services
 Oklahoma City Housing Assistance Program
 Storm Shelter-Safe Rooms
 Jefferson Park Housing Reconstruction (*Recaptured*)
 Midtown Neighborhood Improvement Project (*Recaptured*)
 Oklahoma City Housing Authority
 Central Oklahoma Transportation and Parking Authority Share-A-Fare
 Oklahoma City Abandoned Housing Program
 Community Action Agency Graffiti Removal
 Community Health Services Healing Hands
 Phase II SNI Sidewalks
 Metropolitan Fair Housing Council
 Planning
 Administration

HOME:

Down Payment Assistance Program (80% targeted to NRSA/20% non-targeted)	\$500,000.00
OKC Housing Assistance Program (40% targeted to SNI)	\$1,110, 341.85
Affordable Housing Development Program	\$298,304.59
Community Housing Development Organization (CHDO) Set-aside	\$372,432.60
CHDO Loan Pool-unallocated to CHDO Set-aside	\$80,000.00
Planning and Administration	\$252,488.40
<hr/> TOTAL ALLOCATION OF HOME FUNDS	\$2,613,567.44

**PRIOR YEAR HOME PROJECTS/ACTIVITIES TO BE CARRIED FORWARD TO
2018-19 ALONG WITH ANY REMAINING FUNDS**

Community Housing Development Organization Set-asides
 Community Housing Development Organization Loan Pool funds
 Down Payment Assistance Program
 Affordable Housing Development Program – Mitchford Homes
 Affordable Housing Development Program- First Step SRO
 Affordable Housing Development Program-Unallocated funds

Oklahoma City Housing Assistance Program
Administration

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

Paseo Housing Project

Emergency Solutions Grant (ESG)

ESG funds are awarded through an Open Solicitation process. The Continuum of Care Committee 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 non-profit organizations providing housing assistance and services to the homeless.

Total Allocation of ESG: \$394,559.00

Housing Opportunities for Persons with AIDS (HOPWA)

HOPWA funds are awarded through an Open Solicitation process. The Continuum of Care Committee 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 a local nonprofit service provider who conducts outreach and distributes funds to provide services to persons with HIV/AIDS in the Eligible Statistical Metropolitan Area (ESMA). The ESMA includes seven counties serving the needs of persons with HIV/AIDS and their families.

Total Estimated Allocation of HOPWA: \$702,611.00

Program Income

Program income for the 2018-19 Fourth Action Plan Year will be allocated as follows:

1. Program income generated from Section 108 Loan investment and repayment accounts will be used to pay Section 108 principal and interest.
2. If any funding rebates are provided by material suppliers resulting from Oklahoma City Housing Assistance Program CDBG activities, those funds will be allocated to the Oklahoma City Housing Assistance Program to assist with funding additional Housing Exterior Maintenance projects.
3. Subject to 20% regulatory caps, CDBG program income may be used to fund administrative expenses or create additional administrative capacity during the program year in which it is realized.

4. Program income that is generated by the Oklahoma City Urban Renewal Authority (OCURA) activities during the 2018-2019 program year may be reallocated back to OCURA for use in CDBG eligible activities.
5. In accordance with CPD Notice 97-9, III.J., HOME Program Income deposited to the PJ's letter of credit and that creates additional administrative capacity may be used by the PJ for administrative expenses incurred during the Action Year, and any excess administrative capacity will be carried forward to subsequent years.
6. When practicable, CHDO funds may be reallocated between the CHDO loan pool and CHDO set-aside activities to ensure timely allocation and efficient use of these resources in the production of affordable units.

APPENDIX 8

ESG POLICIES AND PROCEDURES



OKLAHOMA CITY HOMELESS ASSISTANCE PROGRAMS
EMERGENCY SOLUTIONS GRANT

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SECTION I: PROGRAM DESCRIPTION

OVERVIEW

In 2009 the Homeless Prevention and Rapid Rehousing program was created by the American Recovery and Reinvestment Act. This unprecedented funding offered an opportunity to change the way homeless services are delivered in Oklahoma City. This program featured a coordinated effort by homeless service providers to introduce person centered planning, service coordination, financial assistance and needs based supportive services.

The Emergency Solutions Grant (ESG) builds on the lessons learned and features the same philosophy of preventing and solving homelessness with data driven evidence and system coordination.

PHILOSOPHY

The ESG Program is a community-wide effort to prevent and end homelessness within the Continuum of Care by building inter-agency partnerships that work together to provide members of the community with the tools they need to remain in their homes or obtain appropriate affordable permanent housing. This “team” will work to provide a streamlined process of screening, assessment, referral, service coordination, direct assistance and follow up to individuals and families who are in need of safe, affordable and stable housing.

PROGRAM COMPONENTS

Centralized Intake

Heartline/211 maintains the community-wide database for social services in Oklahoma City. Trained call specialists provide resources to the citizens of Oklahoma 24 hours a day, seven days a week which makes 211 the most accessible network for supportive services.

Based on a telephone assessment, 211 call specialists will provide a coordinated assessment and make referrals for specific services or housing, which allows people to move through the system quickly and locate the most appropriate services or housing. The provider agencies funded through the City of Oklahoma City’s ESG funding are required to do an initial intake within 72 hours of the referral from 211.

Data collected from 211 is aggregated with HMIS and used to make program decisions and adjustments about how people enter the service system. 211 used this data as one of their service quality indicators.

Prevention

In order to keep individuals who are eligible for ESG assistance in their current housing or to help them locate new housing, prevention measures in the form of financial assistance and supportive services may be employed. Participants in the program will be provided with a level and intensity of financial assistance and supportive services that are appropriate to their needs to ensure client success in stabilizing or in transitioning to stable housing.

Rapid Rehousing

For the purposes of helping eligible individuals and families who are homeless obtain and sustain housing, the rapid re-housing program is focused on housing relocation and stabilization services such as financial assistance and case management. This type of assistance tends to be more intensive and longer in duration.

Outreach

In order to reach unsheltered homeless individuals and families ESG funds may be used for outreach activities to help connect this population with emergency shelter, housing, or services. This assistance can also extend to non-facility based medical/mental health care if recipients of that care are unable or unwilling to access an appropriate health facility.

Emergency Shelter

ESG funds may be used to provide essential services to homeless families and individuals in emergency shelters as well as shelter operation costs. Costs associated with renovation or rehabilitation of structures to be used as emergency shelters are also eligible.

Housing Locator /Inspection Services

Through ESG funding the City of Oklahoma City provides the services of a Housing Locator/Inspector trained to ensure that housing is safe before individuals and families move into leased units. Providers may request these services which include habitability inspections, lead-based paint inspections, rent reasonable market comparisons, rental consultation and housing location.

Direct Financial Assistance

Through the assessment process eligible program participants may receive direct financial assistance in the form of rent, deposits, utility deposits, utility payments, storage fees, moving expenses and utility arrearages.

Rental assistance/utility payments: Program participants are expected to pay their proportionate share of expenses. The amount will be based on 10% of the household's gross monthly income. Case management staff will calculate the amount of the participant's financial responsibility and assist with budgeting and/or payment options.

HMIS and other Data Collection

ESG funds may be used for costs associated with participating in and administering an HMIS data collection system. If an agency is a provider of services to victims of domestic violence, dating violence, sexual assault, or stalking (victim services) it may use ESG funds to set up a separate data collection system. Data collected for this system should not be entered into HMIS.

Administration

The City may use up to 7.5 percent of their allocation on administrative activities such as management, oversight, monitoring, and reporting.

SECTION II: PROGRAM ELIGIBILITY

A. PARTICIPANT ELIGIBILITY

The US Department of Housing and Urban Development (HUD) provides ESG grant funds to the City of Oklahoma City which then determines how to distribute those funds to local service providers. These service providers must administer services to individuals and families with income below 30% of the Area Median Income (AMI) as determined by HUD, who are either literally homeless or at imminent risk of becoming homeless. Any provider agency that uses ESG funding may not discriminate on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal, or because all or part of an individual's income is derived from any public assistance program.

The intent of ESG is to increase the number of individuals and families who are stably housed by providing resources to persons who are homeless or who would be homeless if not for this assistance.

Provider agencies are responsible for verifying the homelessness or risk of homelessness of every program participant receiving financial assistance (Attachments H, H-b and H-c). Income eligibility and need for assistance must be evaluated and certified regularly. These evaluations should be timed based on the type of assistance being received (*see Case Management/Assessment below*) and the findings must be documented in the participant's Individualized Service Plan (*Attachment F*). ESG case managers are responsible for certifying that all households receiving services meet all eligibility criteria and that no conflict of interest exists (*Attachment D*).

- **Income**

The household must be below 30% of AMI. The household must be able to reasonably access the financial resources needed to sustain housing once ESG assistance ends. Agencies must complete income verification forms (*Attachment I*) and submit them to the appropriate income sources for third party verification. Once completed, these income verification forms should then be placed in the client's file.

Income Limits: All households that receive ESG assistance must be below 30% of AMI. Current HUD AMI limits can be found at:

<http://www.huduser.org/portal/datasets/il/il14/index.html>

- **Case Management/Assessment**

Any individual or family provided with financial assistance through ESG must participate in an initial assessment with a case manager who can determine the appropriate type of assistance to meet their needs. Households receiving more than one month of direct financial assistance must agree to work with a case manager on an ongoing basis and be regularly re-evaluated. These re-evaluations must occur at least once every three months for participants receiving prevention assistance, and at least once annually for those receiving re-housing assistance. A participant is required to notify the agency of any significant changes in income or other circumstances that may effect their need for assistance then an evaluation must be conducted at that time as well.

In addition to evaluations, program participants are required to meet with a case manager at least once a month for assistance in ensuring housing stability unless they are a victim of domestic violence, dating violence, sexual assault or stalking. Case managers should develop an individualized service plan for every participant that takes into account:

- The participant's current and/or expected income and expenses
- Other public or private assistance the participant may receive
- The affordability of available housing in the area

If, for any reason, a person is found to be ineligible for ESG, agencies must have a process in place to refer them to appropriate resources or service providers as well as a process to document those referrals.

- **Housing Status**

Prevention:

Prevention assistance may only be provided to individuals and families who would otherwise be homeless *if not for* ESG assistance. Individuals and families who meet the following criteria, along with the minimum requirements established in Section II. A.1, are eligible under the prevention portion of ESG:

- Individuals or families who are at imminent risk of homelessness according to category 2 of the HUD definition of homelessness.*
- Individuals or families who are homeless under other federal statutes according to category 3 of the HUD definition of homelessness.*

- Individuals or families who are fleeing/attempting to flee domestic violence according to category 4 of the HUD definition of homelessness.*

Additionally, all individuals and families who receive prevention assistance must have an annual income below 30% of AMI.

(* - see definitions in Attachment A)

Rapid Re-housing

Families and individuals who meet one of the following criteria, along with the minimum requirements established in Section II. A.1, are eligible under the rapid re-housing portion of ESG:

- Individuals or families who are homeless according to category 1 of the HUD definition of homelessness.*
- Individuals or families who are fleeing/attempting to flee domestic violence and are homeless according to category 4 of the HUD definition of homelessness.*

(* - see definitions in Attachment A)

The purpose of ESG funds for rapid re-housing is to assist eligible program participants to quickly obtain and sustain stable housing. For all potential program participants, assistance providers will utilize a process to assess their level of service need, other resources available to them, and the appropriateness of their participation in the rapid re-housing assistance portion of ESG.

- **Connection to Mainstream and Other Resources**

Program participants who require longer term housing assistance and/or other services that are ineligible under ESG should be directed to programs that can provide the requisite services and financial assistance needed to achieve independent living. This includes assistance in obtaining permanent housing, medical treatment, mental health treatment, counseling, supervision and other government or private assistance available such as:

- Medicaid
- Supplemental Nutrition Assistance Program
- Women, Infants and Children (WIC)
- Federal-State Unemployment Insurance Program
- Social Security Disability Insurance
- Supplemental Security Income
- Child and Adult Care Food Program

B. PROGRAM ADMISSION

If an individual or family is found to be eligible for ESG assistance, they must be willing to work with a case manager until they are able to obtain and/or stabilize housing. Participants will be required to meet with their case managers *at least* once a month at which time they can seek guidance in locating housing, employment or other means of obtaining income, as well as demonstrate a willingness to work to achieve the goals set in their housing plan. As previously mentioned, only participants who are victims of domestic violence, dating violence, sexual assault, or stalking may be omitted from this requirement if considered necessary. Households must also explain any previous convictions and show compliance with probation, parole and/or treatment noted in their Individualized Service Plan.

SECTION III: PROGRAM RULES AND REGULATIONS

Service providers funded through ESG are responsible for posting, reading, or otherwise making known, the Program Agreement (*Attachment J*) to all ESG participants which includes an appeals policy and a grievance policy for addressing alleged violations of clients' rights. Reasonable efforts must be made to ensure that all program participants, regardless of language abilities, understand their rights and responsibilities. If a program participant has a language barrier, the Case Manager will access an interpreter from the community to ensure that participants understand their rights and responsibilities while participating in the ESG Program.

A. PROGRAM AGREEMENT

Program participants will be asked to sign an agreement outlining the program guidelines and responsibilities of the case manager and the program participant. =(Attachment J).

B. FISCAL PLANNING

Case Managers will work with ESG participants to determine their target budget for sustainable living (including desired earnings) and how they can realistically increase their household income by the planned exit date. In addition, the Case Manager should work with individuals and families to develop a household budget (*Attachment E*) for ongoing use. Appropriate referrals for representative payee services, debt consolidation, payment arrangements, refinancing options and other financial issues should be provided and documented in the client's file.

C. GRIEVANCES/APPEALS

Individuals and families receiving services funded through ESG will have the right to appeal decisions made by the provider agency. Service providers will follow their agency's grievance and appeal process. Notice of this process should be given to participants during intake/admission to the ESG program.

D. TERMINATION/PROGRAM EXIT

Provider agencies funded through ESG may terminate assistance to a program participant who violates program requirements. However, *all extenuating circumstances should be considered before determining whether or not termination is warranted so that it only occurs when necessary.* If a provider agency determines that an individual or family is non-compliant with the program, they will follow their agency policy which must include the following:

- A thirty (30) day written termination notice to the participant containing the reason for termination.
- A review of the decision, in which the participant is given the opportunity to appeal the decision through the provider agency's appeal process.

SECTION IV: PREVENTION/RE-HOUSING ELIGIBLE ACTIVITIES

Though many outreach and shelter activities can be covered by ESG, most services that are funded focus on housing. These services range from financial assistance to pay for housing, to services designed to keep people in housing, to services to help them find appropriate housing. Since not all participants will have the same level of need, it is not expected that all persons will receive identical levels of assistance. ESG is not intended to provide long-term support for program participants, nor will it be able to address all of the financial and supportive services needs of households that affect future housing stability. Rather, assistance should be focused on stabilization of current housing, linking program participants to community resources and mainstream benefits, and helping them develop a plan for future housing stability.

A. PRIORITIES

Even though ESG funds can be used for shelter and outreach activities, the major focus is on helping people who are on the brink of homelessness maintain their current housing or rapidly re-house people who are currently homeless. Follow-up care, including linkages to community-based services, to help the household maintain housing is an essential component of the program. Case Managers will monitor individuals or families' progress and link households to support systems and services as needed.

Households receiving services should have low to moderate barriers to obtaining/sustaining permanent housing and should be earning/capable of earning or receiving income adequate to maintain permanent housing at the conclusion of program services.

1. Prevention Assistance

The prevention program includes financial assistance and case management for households who are currently housed, but are at imminent risk (within two weeks) of becoming homeless and need temporary rent or utility assistance to prevent them from becoming homeless or assistance to move to another unit. In cases where households are seeking to remain in housing that is substandard, it is allowable for ESG case managers to provide assistance in locating and moving households to housing that meets housing standards. Households receiving prevention assistance may need minimum supportive services and follow-up care. The case manager is responsible for providing the appropriate supportive services and follow-up care as needed on a case by case basis. It is anticipated that most prevention assistance will last for 1 to 6 months.

A standardized housing assessment and housing plan will be completed for all program participants to ensure housing stability after ESG assistance terminates.

Prior to issuing any financial assistance, case managers will work with the Housing Resource Locator to conduct a habitability and lead-based paint inspection of the home. (*Attachments M and N*).

A visual assessment/inspection for potential lead-based paint hazards must be conducted for all pre-1978 units in which a pregnant woman and/or child under the age of six will be residing before financial assistance may be provided. Visual assessments/inspections must be conducted regardless of whether the program participant is receiving assistance to remain in an existing unit or moving to a new unit. All ESG case managers are required to become a HUD-certified Lead-Based Paint Visual Assessor by successfully completing the 20 minute online training course on conducting visual assessments on HUD's website (even though the Housing Resource Locator is responsible for visual assessments/inspections).

The case manager will need to contact the landlord or utility company immediately to pledge assistance to prevent or delay imminent eviction or utility cutoff. If the case manager/Housing Resource Locator deems the housing to be substandard, then the case manager will work with the household and the Housing Resource Locator to locate and secure more appropriate housing.

Program participants must demonstrate they will be capable of earning income adequate to sustain their permanent housing at the conclusion of program services.

While clients are participating in ESG, they will be contacted by their case manager for a follow up on a monthly basis or more frequently if necessary. Case managers will also conduct monthly follow-ups for nine months after ESG assistance terminates to ensure housing stability.

2. Rapid Re-housing Assistance

The rapid re-housing program includes financial assistance and case management for households who are homeless and have resolvable barriers to housing, and are likely to sustain housing after the subsidy ends. Case managers will work to move program participants quickly from emergency shelters or other places not meant for human habitation into independent housing, where they will receive case management and services designed to improve their housing stability.

The provision of case management occurs (1) to ensure households have a source of income through employment and/or public benefits, and to identify service needs *before the move into permanent housing*; and (2) to work with households *after the move into permanent housing* to connect families with community based services to meet long term support/service needs and to help solve any remaining problems that threaten the clients' tenancy including difficulties sustaining housing or interacting with the landlord. Home-based case management will be a vital component of rapid re-housing.

Families and individuals may participate in the rapid re-housing program if they have barriers to stability that can be addressed in a community-based setting once they are housed. Those who cannot reasonably be expected to achieve stability within **12 months** should be referred to other, more appropriate supportive housing programs (transitional, permanent supportive, or treatment).

The case manager is responsible for providing the appropriate supportive services and follow-up care, including home-based visits, for all program participants.

The framework for case management in the rapid re-housing program will consist of Permanent housing services. Permanent housing services are services that help households access housing within 21 days of assessment and sustain that housing for at least 7 months after exiting ESG. This includes working with the client to identify affordable units, access housing subsidies, and negotiate leases. Clients may require assistance to overcome barriers, such as poor tenant history, credit history and discrimination based on ethnicity, gender, family make-up and income source. Case managers will work with the Housing Resource Locator to locate appropriate housing.

B. FINANCIAL ASSISTANCE

Payments may not be made directly to program participants; only payments to third parties, such as landlords or utility companies are eligible. Properties owned by the grantee, sub-grantee or the parent, subsidiary or affiliated organization of the sub-grantee may not receive payments that include ESG funding. A lease must be in place and the program participant must be on the lease in order for ESG funds to be used for rent or security deposit.

Financial assistance is limited to the following activities:

Short-term rental assistance

Tenant-based rental assistance that can be used to allow individuals and families to remain in their existing rental units or to help them obtain and remain in rental units they select. Short-term rental assistance may not exceed rental costs accrued over a

period of 1 - 3 months. If the program participant needs additional assistance they can be evaluated for additional time up to 9 months. This should be noted in the HMIS data base.

Medium-term rental assistance

Tenant-based rental assistance can be used to help individuals and families obtain and remain in rental units they select. Medium-term rental assistance may not exceed actual rental costs accrued over a period of 9 months. No program participant may receive more than 9 months of assistance under ESG.

Rental Arrears

When rent is in arrears, the Case Manager is expected to negotiate a payment plan with the landlord when possible. Program participants are expected to pay their proportionate share of these expenses (See Section IV. B.). If ESG funds are to be used to pay rental arrears, arrears payments cannot exceed 6 months and must be factored into the total amount of assistance to be received by the program participant, which cannot exceed 24 months. Rental assistance paid cannot exceed the actual rental cost, which must be in compliance with HUD's standard of "rent reasonableness."

Rental assistance payments cannot be made on behalf of eligible individuals or families for the same period of time that rental assistance is being provided through another federal, state or local housing subsidy program. **This means that rental assistance payments being made under ESG cannot be a combination of funds from ESG and another program e.g. a household receiving rental assistance for public or subsidized housing (OCHA, OHFA, HOPWA, or other program) is not eligible to receive ESG assistance.**

Security and Utility deposits

ESG funds may be used to pay for security and utility deposits. Security and utility deposits may only be paid with ESG funding if the program participant will otherwise be homeless without this assistance.

In contrast to the requirements regarding rental assistance payments, a participant may receive assistance for security and utility deposits from the ESG program while simultaneously receiving assistance from another housing subsidy program as long as the other programs cover different cost types.

Security and utility deposits may be paid as a one-time grant not to exceed the monthly rental amount. Information documenting the need for a security deposit should be obtained at the same time the required rental paperwork is being completed by the client and landlord.

Utility Payments

ESG funds may be used to pay up to 24 months of a participant's utility payments within a 3 year period, including up to 6 months in arrears. When utility payments are in arrears, the Case Manager is expected to negotiate a payment plan with the utility company and program participants will be expected to pay their proportionate share of these expenses (See Section IV.

B.). For assistance to be provided, the program participant or an **adult** member of his/her household must have an account in his/her name with a utility company or proof of responsibility to make utility payments, such as cancelled checks or receipts in his/her name from a utility company.

Moving cost assistance

Funds may be used for reasonable moving costs, such as truck rental, hiring a moving company, or short-term storage fees for a maximum of 3 months or until the program participant is in housing, whichever is shorter. Moving cost assistance payments must be made directly to a third party agency.

If accessing moving/storage services, the case manager must document in detail the circumstances surrounding the need to access these services, include monthly fees that will be charged and the dates in which the services will be accessed. In addition, case managers may need to assist the participant in finding reasonably priced vendors for this service. Payment of temporary storage fees in arrears is not eligible.

Motel/Hotel vouchers

Funds may be used for reasonable and appropriate motel and hotel vouchers for up to 7 days for homeless families if no appropriate shelter beds are available and **subsequent rental housing has been identified** but is not immediately available for move-in by the program participants.

C. PARTICIPANT SHARED COSTS

Program participants are expected to pay 10% of their monthly gross income for rent, utilities and other costs associated with achieving their housing goals. If participant income is zero at program entry, then shared amount is zero. Participant income should be reevaluated every month.

Example: *Participant's monthly gross income is \$1,000, then proportionate share for housing expense is $\$1,000 \times .10 = \100.00*

D. FINANCIAL ASSISTANCE CAPS

The maximum amount of financial assistance for prevention households is \$3,000. The maximum amount of financial assistance for rapid rehousing households is \$5,000.

If an ESG Case Manager determines additional financial assistance is needed and will sustain the household's housing within the next 90 days, then consideration can be given to extend assistance beyond the set caps with the approval of the case manager's immediate supervisor and the City of Oklahoma City Planning Department.

E. SUPPORT SERVICES

APPROPRIATE HOUSING

Housing should be mutually agreed upon by both the Case Manager and the Head of Household. At a minimum, housing should be safe, affordable, and in a neighborhood that meets the needs of the family or individual.

Locating adequate housing is the responsibility of the family/individual, the Case Manager, and the Housing Resource Locator. If needed, transportation should be provided to help families/individuals visit the units, complete the Housing Checklist, and make application for housing.

Participants should examine housing and ensure for themselves that it is in good repair, that all facilities are in good working order, and that it is located in suitable neighborhoods. Program participants will meet with the case manager and/or Housing Resource Locator to inspect a property and complete a Housing Checklist prior to accepting the property (signing the lease). Case Managers should caution participants not to accept housing that does not meet minimum standards *even if the landlord verbally promises to fix these problems*. A Rent Reasonableness form (*Attachment K*) and a completed Housing Checklist (*Attachment L*) should be maintained in the client record files.

Case Managers should help program participants reduce housing barriers by linking participants to community resources. Resources should include, but not be limited to:

EMPLOYMENT LINKAGES

Case managers shall establish referral relationships with employers and employment programs for program participants seeking work. Furthermore, in instances where additional job skills are obviously necessary to elevate the program participant's income to a viable level, the Case Manager shall link them to local job training programs. All interdisciplinary team members should be noted in the ISP and progress documented.

ENROLLMENT IN COMMUNITY BENEFITS

Case Managers must leverage other resources on behalf of program participants whenever possible and reasonable. Sources shall include, but are not limited to: Section 8 housing vouchers, public housing, food stamps, Medicaid, Social Security, public child care subsidy, FEMA, TANF, food pantries, and other donated goods or services. Evidence of leveraged resources should be documented and maintained in the client's file.

LEGAL ASSISTANCE AND LINKAGES

Case Managers shall also assess participants legal needs, advocate for resolutions of legal problems and make appropriate referrals to Legal Aid Services of Oklahoma. Families owed back child support shall be linked to child support collection assistance.

ACCESS TO PUBLIC EDUCATION

In cases where truancy is a housing barrier, the case manager shall work with the household to ensure that the children and youth served by the program have access to public education and their rights are protected in accordance with Federal and state requirements.

Health Services

If an individual or family member has a health issue requiring treatment, case workers should ensure that treatment is provided and that services are provided by licensed medical professionals. ESG funds can be used for this purpose so long as there are no other accessible or available locations within the area where these services can be provided.

MENTAL HEALTH/SUBSTANCE ABUSE COUNSELING

If an individual or family member has a problem with mental health or substance abuse that is a housing barrier then the case manager will refer the individual or family member to an appropriate provider to reduce/eliminate that housing barrier.

F. SERVICE LEVELS AND COORDINATION

ESG case managers have the primary responsibility of resolving participant households' barriers to housing. Many of the households will already be working with, or need to work with, case managers from other systems, such as Department of Human Services, Mental Health, Corrections, School Districts, Children's Services, etc. It will be the responsibility of the ESG case managers to coordinate and make referrals to those other case managers as necessary and appropriate.

It is expected that ESG case managers will also coordinate and work cooperatively with other Continuum of Care service providers to promote the best interests of participants.

In order to make this coordination possible, ESG participants will be asked to sign a standard ESG Release of Information form during the initial assessment process (*Attachment Q*).

Individualized Service Plans will be developed by program participants with the help of ESG Case Managers.

SECTION V: INELIGIBLE AND PROHIBITED ACTIVITIES

- As part of the planning process, provider agencies are strongly encouraged to maximize benefits that may be available with other subsidies and benefits. The intent of ESG is to provide funding for **housing** expenses to persons who are currently homeless or who would be homeless if not for this assistance. Therefore, financial assistance or services to pay for expenses that are available through other federal, state and local programs are not eligible. Case managers should work to link participants to other resources.
- Financial assistance to pay for any mortgage costs or costs needed by homeowners to assist with any fees, taxes, or other costs of refinancing a mortgage are ineligible. **ESG is intended for renters only.**
- Utility payments may not be made on behalf of homeowners.
- ESG funds may not be used to pay for any of the following items:
 - construction or rehabilitation
 - credit cards bills or other consumer debt
 - car repair or other transportation costs
 - travel or food costs
 - clothing and grooming
 - home furnishings
 - pet care
 - entertainment activities
 - cash assistance to program participants
- ESG funds may not be used to move an individual or family into or out of a transitional housing program, nor may it be used to assist persons residing in a transitional housing program.
- ESG funds may not be used to duplicate payments for the exact same cost type for the same time period that other funds (federal, state, or local) support.

*** This is not a comprehensive list of ineligible activities and new local requirements can be determined at any time. If an agency is unsure as to whether a cost is allowable they should contact the Continuum of Care lead agency for assistance.*

SECTION VI: EMERGENCY SHELTER/OUTREACH ELIGIBLE ACTIVITIES

A. STREET OUTREACH

While the emphasis of the ESG program is primarily on housing, a portion of funds may still be allocated for outreach and emergency shelter activities. This amount must be limited to either 60 percent of the total grant or the amount of funds committed for homeless assistance in fiscal year 2010, whichever is greater. However, actual allocation to these activities typically fall far short of this limit making it highly unlikely that any one shelter can provide all of the services listed here.

Engagement – Costs related to locating and building relationships with members of the unsheltered homeless population in order to connect them with homeless assistance programs, mainstream social services and housing programs, or other support services. These activities include:

- An initial assessment of needs and eligibility
- Crisis counseling
- Attending to urgent physical needs such as meals, blankets, clothing, toiletries, etc...
- Providing referrals and information on assistance programs or mainstream social service and housing programs. These may include:
 - *Emergency shelter*
 - *Transitional housing*
 - *Community-based services*
 - *Permanent supportive housing*
 - *Rapid re-housing programs*

Additionally, the costs incurred by outreach workers while performing these activities are also eligible for coverage under ESG.

Case Management – Costs related to the assessment of housing and service needs as well as arranging, coordinating, and monitoring delivery of services to the program participant. Eligible services are:

- Use of the coordinated assessment system. (Once established, all ESG-funded programs are required to use the coordinated assessment system unless they are a victim service provider.)
- Conducting an initial evaluation which should include:
 - Documenting eligibility
 - Counseling
 - Securing and coordinating services
 - Obtaining federal, state, and/or local benefits
 - Monitoring and evaluating participant's progress
 - Providing information and referrals to other providers
 - Developing an individualized housing and service plan leading to permanent housing stability

Emergency Health Services – So long as health services are provided by licensed medical professionals and there are no other accessible or available locations within the area where these services can be provided, ESG funds can be used to provide direct outpatient treatment for medical conditions in community-based settings such as streets, parks, and other places where unsheltered homeless are living. Eligible treatment consists of:

- Assessing a participant's health problems
- Developing a treatment plan
- Helping participants understand their health needs
- Providing or assisting participants in obtaining emergency medical treatment
- Providing medication and follow-up services

Emergency Mental Health Services – ESG funds may be used for the treatment of mental health conditions under guidelines similar to health services. Mental health services must be administered by a licensed mental health professional and can only be funded by ESG if there are no other appropriate accessible or available services in the community. Eligible treatments are:

- Crisis interventions
- Prescription of psychotropic medications
- Explanation about the use and management of medications
- A combination of approaches to treat multiple problems

Transportation – Transportation costs for outreach workers, social workers, medical and mental health professionals, as well as other service providers are eligible under ESG so long as travel occurs during service provision. Transportation costs for unsheltered participants may also be covered so long as they are travelling to an emergency shelter or other service facility. These costs include:

- A participant's travel on public transportation
- Mileage allowance if service workers use their own vehicle
- Vehicle leasing costs for service workers as well as gas, insurance, taxes, and maintenance costs
- Travel costs for service workers to accompany or assist participants in using public transportation

Services for Special Populations – ESG funds may be used to provide services for members of special populations such as homeless youth, people living with HIV/AIDS, and victims of domestic violence, dating violence, sexual assault, or stalking (victim services). In the case of victim services, this aid can be provided by any organization with a documented history of effective victim assistance such as rape crisis centers or domestic violence shelters.

B. EMERGENCY SHELTER

Case Management – Assessing, arranging, coordinating, and monitoring the delivery of a service plan designed to fit the needs of a program participant is eligible for funding under ESG. This includes the following services:

- Use of the coordinated assessment system
- Conducting an initial evaluation and verifying and documenting eligibility
- Counseling
- Developing, securing, and coordinating services and obtaining Federal, State, and/or local benefits
- Monitoring and evaluating participant's progress
- Providing information and referrals to other service providers
- Providing risk assessment and safety planning for victims of domestic violence, dating violence, sexual assault, and stalking
- Developing a housing and service plan designed around the participant's needs and with the intent of leading to permanent housing

Child Care – Costs associated with child care for program participants are eligible under ESG. If the participant is disabled they must be under the age of 18. Otherwise, all participants who receive child care must be under the age of 13. Eligible costs consist of:

- Providing meals and snacks
- Providing coordinated sets of developmental activities

Education Services – If considered necessary to obtain and maintain housing, costs associated with improving basic educational skills are eligible. Included in these costs are:

- Training in consumer education
- Health education
- Substance abuse prevention
- Literacy
- English as a Second Language (ESL)
- General Education Development (GED)

Components that can be funded under education services are:

- Screening, assessment, and testing
- Instruction (individual or group)
- Tutoring
- Books and other instructional materials

- Supplies
- Counseling
- Referral to community resources

Employment Assistance and Job Training – employment assistance and job training costs for participants are eligible for ESG coverage. This can be any kind of instruction or training that can help an individual secure employment and/or increase their earning potential. Additionally, provision of reasonable stipends to individuals in employment and job training programs is also an eligible cost. Employment and job training services that are covered are:

- Employment screening, assessment, or testing
- Structured job skills and job-seeking skills
- Special training and tutoring (EX. prevocational training or literacy training)
- Books and instructional material
- Counseling or job coaching
- Referral to community resources

Outpatient Health Services – Direct outpatient treatment of medical conditions is eligible under ESG so long as services are provided by licensed medical professionals and other appropriate health services are not available within the community. Outpatient treatment may consist of:

- Assessing a participant's health problems and developing a treatment plan
- Assisting participants to understand their health needs
- Providing or assisting participants in obtaining appropriate treatment, preventative care, and health maintenance services, including:
 - Emergency medical services
 - Provision of medication and follow up services
 - Provision of preventative and non-cosmetic dental care

Legal Services – ESG funds may be used to pay for fees for legal advice and representation by attorneys who are licensed by the bar association of the state as well as persons under the attorney's supervision. This is with regards to matters that may interfere with the program participant's ability to obtain housing. ESG funds may only be used for legal services if other appropriate resources are not available in the community. Matters that are eligible are:

- Child support
- Guardianship
- Paternity

- Emancipation and legal separation
- Orders of protection for victims of domestic violence, dating violence, sexual assault, and stalking
- Appeal of veterans and public benefit claim denials
- Resolution of outstanding criminal warrants

Eligible component services are:

- Client intake
- Preparation of cases for trial
- Provision of legal advice
- Representation at hearings
- Counseling
- Filing fees and other court costs

Fees for the actual service performed are eligible only if the cost would be less than the cost of hourly fees. If the subrecipient is a legal services provider, then employee salaries and other costs necessary to perform the service may also be covered. Fees that are not eligible are for matters of citizenship, immigration, mortgage or retainer and contingency fee arrangements.

Life Skills Training – Teaching of critical life management skills that are necessary for a participant to function in the community are eligible for ESG funding. Training may consist of:

- Budgeting resources
- Managing money
- Managing a household
- Resolving conflict
- Shopping for food and needed items
- Improving nutrition
- Using public transportation
- Parenting

Mental Health Services – Funds may be used for the direct outpatient treatment of mental health conditions so long as it is performed by licensed professionals and there are no other available or accessible resources within the community. Eligible treatments are:

- Crisis interventions
- Individual, family, or group therapy sessions
- Prescription of psychotropic medications

- Explanations about the use and management of medications
- Combinations of therapeutic approaches

Substance Abuse Treatment – Substance abuse treatment services can be covered by ESG funds so long as there are no other available or accessible resources in the community and treatment is performed by licensed or certified professionals. Eligible treatments are:

- Client intake and assessment
- Outpatient treatment for up to 30 days
- Group or individual counseling and drug testing

Detox and other inpatient treatments are not eligible for funding.

Transportation – Transportation costs for program participants are covered under ESG so long as travel is to and from eligible essential services such as medical care, employment, or child care. These costs include:

- A participant's travel on public transportation
- Mileage allowance if service workers use their own vehicle to visit participants
- Vehicle leasing costs for service workers as well as gas, insurance, taxes, and maintenance costs so long as they are visiting or transporting participants
- Travel costs for service workers to accompany or assist participants in using public transportation

Services for Special Populations – ESG funds may be used to provide services for members of special populations such as homeless youth, people living with HIV/AIDS, and victims of domestic violence, dating violence, sexual assault, or stalking (victim services). In the case of victim services, this aid can be provided by any organization with a documented history of effective victim assistance such as rape crisis centers or domestic violence shelters.

Renovation – Renovation and/or major rehabilitation of an emergency shelter owned by a government or private non-profit organization can be paid for with ESG funds. Eligible costs include:

- Labor
- Materials
- Tools
- Other costs related to renovation

Shelter Operations – Costs associated with the operation of an emergency shelter are eligible for funding through the ESG program. These costs are:

- Maintenance
- Rent
- Security
- Fuel
- Equipment
- Insurance
- Utilities
- Food
- Furnishings
- Necessary supplies

These costs also include hotel/motel vouchers for homeless families or individuals if an emergency shelter is not available.

C. LIMITS ON EXPENDITURES

The CITY is limited to what it can expend on outreach and emergency shelter activities to **A)** 60% of the full fiscal year grant or **B)** the amount of grant funds committed for homeless assistance activities in 2010. Whichever is greater.

SECTION VII: ADMINISTRATION AND HMIS PROCEDURES

ESG funds may be used for costs associated with participating in and administering an HMIS data collection system such as purchasing or leasing of computer hardware or software and salaries for HMIS operators. If a subrecipient is a provider of services to victims of domestic violence, dating violence, sexual assault, or stalking (victim services) it may use ESG funds to set up a separate data collection system. *Data collected for this system should not be provided to HMIS.* Additionally, a recipient may use up to 7.5 percent of total grant funds on costs related to administration of ESG activities.

A. QUALITY ASSURANCE

The ESG program will be monitored annually by the City of Oklahoma City and random monitoring may be conducted by HUD. The City may conduct monitoring more frequently if necessary.

B. CLIENT PARTICIPATION

- Decision-making processes: Case managers shall ensure that clients are involved in decision-making processes, including planning for services and program quality improvement. This is accomplished by ensuring clients participate in the development of housing goals, choose their own housing, use the Housing Checklist, achieve successful exits, and by reviewing grievances and exit surveys.
- Evaluation: Clients participate in service evaluation via exit interviews and client satisfaction surveys. Surveys shall be collected and analyzed monthly to evaluate the ESG program.
- Focus groups will be conducted annually with ESG participants and the general public for the purpose of gathering information to improve the overall quality of the program.

C. DATA COLLECTION

ESG projects are required to record client demographic and program data in HORIZON, the community's Homeless Management Information System (HMIS). All ESG partner agencies will comply with HUD's most recent HMIS Data Standards and will agree to maintain excellent data integrity by entering 100% of ESG required data fields into HORIZON in real time (data entered at time of service). To assist in this requirement, agencies will run and/or review appropriate ESG reports weekly to ensure consistent compliance. Agencies will agree to correct inaccurate or incomplete data within three days and will seek HORIZON'S network support and technical assistance, as needed, to ensure proper software usage and excellent data integrity. All requests for assistance will be documented.

Training is also crucial. All network users must successfully complete HORIZON'S certification training prior to accessing client data. If needed, supplemental training will be available.

Eligibility, demographics, and homelessness risk factor data for participant households as well as data about services provided to households must be entered and tracked in HORIZON. Each individual assisted and the dollar amount of each type of financial assistance provided must be entered into HORIZON for tracking purposes.

The City will monitor program reports, program outcomes, and expenditure eligibility. All of the following required data will be available to the City from HORIZON as all partner agencies must comply with their HMIS data entry requirements:

- Number of households identified as at risk of homelessness
- Number of households identified as homeless
- number of households assisted with financial assistance and/or housing stabilization services
- number of households assisted who do not become homeless after receiving ESG
- average cost of financial assistance provided per household assisted with flexible financial assistance

D. CONFIDENTIALITY

Each ESG agency must develop and implement written procedures to ensure the confidentiality of records pertaining to any individual or family provided with assistance. In addition, the address or location of any ESG assisted shelter project working with victims of domestic violence, dating violence, sexual assault, or stalking will not be made public unless authorized by the shelter operator.

E. RECORD RETENTION

Documentation of each individual or families' homelessness or risk of homelessness as well as all other records must be retained for **5 years** after the expenditure of all funds from the grant under which they were served.

F. REIMBURSEMENT PROCEDURES

All ESG partner agencies will submit monthly reimbursement requests by the 10th day of the month for the previous month. All project funds will be paid on a reimbursement basis. Monthly submissions using the City's Request for Funds form will be used to document expenditures and request payment. Copies of all reports, Requests for Funds, and supporting documentation will be maintained and made available upon request for monitoring purposes. Payment is contingent upon meeting all contractual requirements.

SECTION VIII: PROGRAM FUNCTIONS

A. ROLES & RESPONSIBILITIES

1) Coordinated Assessment

Responsibilities Include:

- Assess individuals and families using the ESG assessment tool to determine what community programs/resources best fit their needs
- If a household is deemed ineligible for ESG, the household will be referred to appropriate resources in the community
- If a household meets ESG program criteria, they will be referred to an ESG partner. Notification should be given the same day to ensure program participant is put in contact with an ESG case manager within 72 hours
- Referrals to case management partners will be made on a rotating basis to ensure there is an even distribution among the case management team
- Evaluate and document the program participants' risk of homelessness or homeless status

** 211 will provide 24/7 assessment coverage*

2) Prevention

Responsibilities Include:

- Assess eligible individuals and families needing housing prevention services within 72 hours of the referral
- Complete a standardized housing assessment to determine need level and appropriate services
- Work with the Housing Resource Locator to ensure home is habitable and free of lead-based paint using the Housing Habitability Worksheet (*Attachments M and N*). A lead-based paint inspection must be conducted if the unit was built pre-1978 and a pregnant woman or child under the age of 6 resides in the home. If the home does not meet the lead-based paint requirement, financial assistance may not be provided. If the home does not meet the habitability inspection then an initial assistance payment may be provided for emergency needs; however, the case manager should work with participant to identify safe and affordable housing.
- If necessary, Case Managers will complete a housing plan and provide financial assistance for eligible ESG participants within 48 hours of assessment in order to avoid eviction or utility cutoff.
- Provide monthly follow-up or more often if needed to ensure and document housing stability
- If more appropriate and affordable housing is needed, coordinate with the Housing Resource Locator
- Provide on-going case management services to program participants who need more intensive supportive services
- Verify and document the program participants' risk of homelessness status at program entry (*Attachments H-b & H-c*)
- Evaluate, document and certify eligibility of program participants at least once every month for all program participants

- Track financial assistance to all program participants (*Attachment E*)
- Provide face-to-face monthly follow-up evaluations for nine months following program exit

2) Rapid Re-housing Services

Responsibilities Include:

- Assess eligible individuals and families needing rapid rehousing services within 72 hours of the referral
- Verify and document the program participants' homeless status at program entry (*Attachment H-b & H-c*)
- Complete a standardized housing assessment to determine need level and appropriate services
- Case managers will provide in-person contact with participants weekly or more often while participants are in shelters or homeless to:
 - develop a sustainable housing plan
 - help client work through immediate barriers to obtaining housing within 21 days
 - help client locate housing; and
 - provide necessary financial assistance to obtain housing
- Coordinate with the Housing Resource Locator
- Provide supportive services for participants including case management, information and referral, community services, advocacy, and follow-up assistance once housing is obtained
- Provide on-going case management services, including home-based case management to program participants to ensure housing stabilization. Once housed, case managers will conduct home visits monthly or more often if needed to ensure housing stability.
- Evaluate, document and certify eligibility of program participants at least once every month for all persons receiving assistance
- Track financial assistance to all program participants (*Attachment E*)
- Provide face-to-face monthly follow-up evaluations for nine months following program exit

3) HOUSING RESOURCE LOCATOR

Responsibilities Include:

- Create and develop an inventory of available, affordable housing units for low to no income households. Housing should be safe, decent and located in different areas of the community to meet needs of program participants
- Complete a rent reasonableness form for all housing included in the housing database (*Attachment K*)
- Conduct inspection of all properties to ensure habitability standards are met and meet lead-based paint requirements (*Attachments M & N*). Units must be inspected annually and when change of tenancy occurs.
- Respond to case manager's request for housing location assistance within 24 hours from time of request
- Coordinate with case managers to help households locate safe and affordable housing in all areas of the community. If household has requested housing in a specific area that is not listed on the database, Housing Resource Locator will identify appropriate housing within 7 days from time of request
- Coordinate with case managers to help households obtain and sustain housing
- Meet with case managers and program participants for walk through inspection, for all program participants acquiring new housing, to ensure housing meets needs of program participants and to identify housing issues that could affect stability or return of deposit (*Attachment L*)
- Ensure that landlords who do not adequately maintain properties or have abused tenants' rights are not included in the housing inventory
- Work with Legal Aid to help program participants understand leases and counsel tenants
- Conduct outreach with property owners to locate housing
- Collaborate with case managers and Legal Aid, when needed, to help resolve client and landlord issues that place client housing in jeopardy
- Submit a monthly report to the City of Oklahoma City Planning Department, outlining the number of landlords contacted; number of units identified and included on the housing inventory; number of inspections conducted with client and case managers; and, the number of units occupied as a result of ESG.

All ESG partners are required to:

- Maintain client records with accurate demographic information
- Collect necessary verifications required by the City of Oklahoma City and HUD and maintain them in client's record
- Comply, if asked to participate in HUD-sponsored research and evaluation of ESG program
- Report client level data (outputs and outcomes) information in the community's homeless information management system (Horizon)
- Submit quarterly and annual reports to the designee in the OKC Planning Department

- Attend ESG systems meetings with community partners
- Ensure confidentiality of program participants and client records
- Analyze client satisfaction surveys and grievances for the program participants served
- Use standardized ESG assessment and planning tools

SECTION IX: ATTACHMENTS

ATTACHMENT A: HUD HOMELESS DEFINITIONS AND RECORDKEEPING REQUIREMENTS



Homeless Definition

CRITERIA FOR DEFINING HOMELESS	Category 1	Literally Homeless	(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: <ul style="list-style-type: none"> (i) Has a primary nighttime residence that is a public or private place not meant for human habitation; (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); <u>or</u> (iii) Is exiting an institution where (s)he has resided for 90 days or less <u>and</u> who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
	Category 2	Imminent Risk of Homelessness	(2) Individual or family who will imminently lose their primary nighttime residence, provided that: <ul style="list-style-type: none"> (i) Residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; <u>and</u> (iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing
	Category 3	Homeless under other Federal statutes	(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who: <ul style="list-style-type: none"> (i) Are defined as homeless under the other listed federal statutes; (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; (iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; <u>and</u> (iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers
	Category 4	Fleeing/ Attempting to Flee DV	(4) Any individual or family who: <ul style="list-style-type: none"> (i) Is fleeing, or is attempting to flee, domestic violence; (ii) Has no other residence; <u>and</u> (iii) Lacks the resources or support networks to obtain other permanent housing



Homeless Definition

ELIGIBILITY BY COMPONENT (Projects Funded in FY 2011 CoC Competition – SHP and S+C Programs)	Supportive Services Only	Individuals and Families defined as Homeless under the following categories are eligible for assistance in SSO projects: <ul style="list-style-type: none"> • Category 1 – Literally Homeless • Category 2 – Imminent Risk of Homeless • Category 3* – Homeless Under Other Federal Statutes • Category 4 – Fleeing/Attempting to Flee DV
	Safe Havens	Individuals defined as Homeless under the following categories are eligible for assistance in SH projects: <ul style="list-style-type: none"> • Category 1 – Literally Homeless SH projects have the following additional NOFA limitations on eligibility within Category 1: <ul style="list-style-type: none"> • Must serve individuals only • Individual must have a severe mental illness • Individual must be living on the streets and unwilling or unable to participate in supportive services
	Transitional Housing	Individuals and Families defined as Homeless under the following categories are eligible for assistance in TH projects: <ul style="list-style-type: none"> • Category 1 – Literally Homeless • Category 2 – Imminent Risk of Homeless • Category 3* – Homeless Under Other Federal Statutes • Category 4 – Fleeing/Attempting to Flee DV
	Permanent Supportive Housing	Individuals and families defined as Homeless under the following categories are eligible for assistance in PSH projects: <ul style="list-style-type: none"> • Category 1 – Literally Homeless • Category 4 – Fleeing/Attempting to Flee DV PSH projects have the following additional NOFA limitations on eligibility within Category 1: <ul style="list-style-type: none"> • Individuals and Families coming from TH must have originally come from the streets or emergency shelter • Individuals and Families must also have an individual family member with a disability Projects that are dedicated chronically homeless projects, including those that were originally funded as Samaritan Bonus Initiative Projects must continue to serve chronically homeless persons <u>exclusively</u>

* Projects must be located within a CoC that has received HUD approval to serve this category. For more information about receiving HUD approval, please read: [Notice on Limitation on Use of Funds to Serve Persons Defined as Homeless Under Other Federal Laws](#)




Homeless Definition

ELIGIBILITY BY COMPONENT (Emergency Solutions Grants Program)	Street Outreach	<p>Individuals defined as Homeless under the following categories are eligible for assistance in SO:</p> <ul style="list-style-type: none"> • Category 1 – Literally Homeless • Category 4 – Fleeing/Attempting to Flee DV (where the individual or family also meets the criteria for Category 1) <p>SO projects have the following additional limitations on eligibility within Category 1:</p> <ul style="list-style-type: none"> • Individuals and families must be living on the streets (or other places not meant for human habitation) and be unwilling or unable to access services in emergency shelter
	Emergency Shelter	<p>Individuals and Families defined as Homeless under the following categories are eligible for assistance in ES projects:</p> <ul style="list-style-type: none"> • Category 1 – Literally Homeless • Category 2 – Imminent Risk of Homeless • Category 3 – Homeless Under Other Federal Statutes • Category 4 – Fleeing/Attempting to Flee DV
	Rapid Re-housing	<p>Individuals defined as Homeless under the following categories are eligible for assistance in RRH projects:</p> <ul style="list-style-type: none"> • Category 1 – Literally Homeless • Category 4 – Fleeing/Attempting to Flee DV (where the individual or family also meets the criteria for Category 1)
	Homelessness Prevention	<p>Individuals and Families defined as Homeless under the following categories are eligible for assistance in HP projects:</p> <ul style="list-style-type: none"> • Category 2 –Imminent Risk of Homeless • Category 3 – Homeless Under Other Federal Statutes • Category 4 – Fleeing/Attempting to Flee DV <p>Individuals and Families who are defined as At Risk of Homelessness are eligible for assistance in HP projects.</p> <p>HP projects have the following additional limitations on eligibility with homeless and at risk of homeless:</p> <ul style="list-style-type: none"> • Must only serve individuals and families that have an annual income <u>below</u> 30% of AMI



Homeless Definition

RECORDKEEPING REQUIREMENTS 	Category 1	Literally Homeless	<ul style="list-style-type: none"> • Written observation by the outreach worker; <u>or</u> • Written referral by another housing or service provider; <u>or</u> • Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter; • For individuals exiting an institution—one of the forms of evidence above <u>and</u>: <ul style="list-style-type: none"> ○ discharge paperwork <u>or</u> written/oral referral, <u>or</u> ○ written record of intake worker’s due diligence to obtain above evidence <u>and</u> certification by individual that they exited institution
	Category 2	Imminent Risk of Homelessness	<ul style="list-style-type: none"> • A court order resulting from an eviction action notifying the individual or family that they must leave; <u>or</u> • For individual and families leaving a hotel or motel—evidence that they lack the financial resources to stay; <u>or</u> • A documented and verified oral statement; <u>and</u> • Certification that no subsequent residence has been identified; <u>and</u> • Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing
	Category 3	Homeless under other Federal statutes	<ul style="list-style-type: none"> • Certification by the nonprofit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; <u>and</u> • Certification of no PH in last 60 days; <u>and</u> • Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days; <u>and</u> • Documentation of special needs <u>or</u> 2 or more barriers
	Category 4	Fleeing/ Attempting to Flee DV	<ul style="list-style-type: none"> • <i>For victim service providers:</i> <ul style="list-style-type: none"> ○ An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker. • <i>For non-victim service providers:</i> <ul style="list-style-type: none"> ○ Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; <u>and</u> ○ Certification by the individual or head of household that no subsequent residence has been identified; <u>and</u> ○ Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

ATTACHMENT B: OTHER DEFINITIONS

Partner Agency or Agency

Any organization which is provided with funds or responsibilities to carry out ESG activities that is accountable to the City of Oklahoma City

Precariously Housed and At-Risk of Homelessness

People who are in their own housing or doubled up with friends or relatives and are at-risk of losing their housing due to high housing costs, conflict, or other conditions that negatively impact their ability to remain housed; and the household lacks the financial resources and support networks needed to obtain immediate housing or remain in existing housing

Stably Housed

People who are in a stable housing situation and not at risk of losing their housing (i.e., do not meet the criteria for being precariously housed, imminently at risk of becoming homeless or literally homeless)

Program Participant or Household

An individual or family with or without children that is provided ESG financial assistance or housing relocation and stabilization services through a rapid re-housing or prevention program. In this manual, the term “household” refers to individuals or families.

Family

Household with at least one adult and one child.

HORIZON

Homeless Management Information System (HMIS) utilized by the City of Oklahoma City Continuum of Care

HUD

The U.S. Department of Housing and Urban Development

CITY

City of Oklahoma City Planning Department

Substandard Housing

HUD definition:

1. Is dilapidated. A housing unit is dilapidated if it:

- does not provide safe and adequate shelter AND meets the criteria in either paragraphs 2, 3 or 4
 - endangers the health, safety or well being of a family in its present condition
 - has one or more critical defects; OR
 - Has a combination of intermediate defects in sufficient number or extent to require considerable repair or rebuilding. (The defects may involve original construction, or they may result from continued neglect or lack of repair or rebuilding).
2. does not have operable indoor plumbing;
 3. does not have a usable flush toilet, bathtub or shower inside the unit for the exclusive use of a family;
 4. does not have electricity or has inadequate or unsafe electrical service;
 5. does not have safe or adequate source of heat;
 6. should, but does not, have a kitchen;
 7. OR, has been declared unfit for the habitation by an agency or unit of government.

Quarterly Performance Report (QPR)

Monthly reports are due the 10th day of each month for the prior month

ATTACHMENT C: Homeless Documentation

Grantees are required to maintain adequate documentation of homelessness or at risk of homelessness (in the client file) to determine the eligibility of persons served.

Documentation should include the following:

Situation	Documentation
Persons living on the street or in short-term emergency shelter	Information should be obtained to indicate that the participant is living on the street or in short-term emergency shelter. This may include names of organizations or outreach workers who have assisted them in the past, whether the client receives any general assistance checks and where the checks are delivered, or any other information regarding the participant's activities in the recent past that might provide documentation. If unable to verify that the person is living on the street or in short-term emergency shelter, the participant or a staff person may prepare a short written statement about the participant's previous living place. The participant should sign the statement and date it.
Persons being evicted from a private dwelling or house being foreclosed	Obtain evidence of formal eviction notice indicating that the participant was being evicted within two weeks before receiving homeless assistance. If the participant's friends or family is evicting, a statement describing the reason for eviction must be signed by the friend or family member and dated. In other cases where there is no formal eviction process, persons are considered evicted when they are forced out of the dwelling unit by circumstances beyond their control. In those instances, obtain a signed and dated statement from the participant describing the situation. The grantee must make efforts to confirm that these circumstances are true and have written verification describing the efforts and attesting to their validity. The verification should be signed and dated.
Persons being released from jail or prison, or leaving an inpatient mental health facility or chemical-dependency treatment facility	Obtain evidence from the referring facility's case manager or other authorized staff that the participant is being or was released/exited and has no identified housing option.
Persons fleeing domestic violence	Obtain written verification from the participant that he/she is fleeing a domestic violence situation. If a participant is unable to prepare verification, the case manager may prepare a written statement about the participant's previous living situation for the participant to sign and date.
Utility shut off	Obtain evidence from the utility company of notice of termination.

APPENDIX 9

AP-75 NARRATIVE RESPONSES (CONTINUATION)

AP-75 Barriers to affordable housing – 91.220(j)

Introduction

An Analysis of Impediments (AI) was completed for the City in January 2015. The AI includes a review of both public and private sector housing data in Oklahoma City to identify practices or conditions that limit fair housing choice. Analysis of demographic, economic, and housing data used in the report establishes the context in which housing choices are made. Five (5) **private sector** impediments were identified in the AI:

1. More frequent denial of home purchase loans to Black, Hispanic, and female applicants.
2. Predatory style lending falls more heavily on Black and Hispanic borrowers
3. Discriminatory terms, conditions, privileges, or facilities relating to rental; refusal to rent.
4. Failure to make reasonable accommodation.
5. Lack of understanding of fair housing laws.

In addition to the private sector impediments noted above, the AI also identified the following potential **public sector** impediments:

1. Insufficient understanding of fair housing laws
2. Concentration of subsidized and assisted housing in areas with high concentrations of minority residents and households in poverty.
3. NIMBYism (Not in My Back Yard) is used to block multifamily development
4. Zoning prevents a barrier in some areas
5. Lack of adequate public transit in the city
6. Insufficient fair housing protections in city anti-discrimination law

Policies and ordinances adopted by the City are intended to protect the health, safety and public welfare of citizens and property. The City's policies and ordinances are not meant to create barriers to the development of affordable housing. Some policies and ordinances may result in an unintended consequence (i.e. increasing the cost to develop, maintain and improve affordable housing). The City attempts to limit or eliminate adverse impacts through review of proposed development code amendments prior to enactment, and by reviewing existing codes. Recent efforts to reduce regulatory barriers to affordable housing include:

- Adoption of the International Existing Building Code; This Code applies to multi-family housing and reduces financial barriers to renovating existing building by allowing greater flexibility in materials used in the renovation;
- The City has exempted impact fees for water and sewer in the core area of the city to reduce the

cost of infill housing and other redevelopment efforts;

- The City has exempted the fees for permits to nonprofit builders of affordable housing;
- The City does not require engineering or architectural seals for nonprofit affordable housing developers; The rules and requirements for architectural seals are statutorily mandated by the Oklahoma State Architectural and Registered Interior Designers Act (59 Oklahoma Statutes, 2007, Section 46.1 et seq.). Specifically, Section 46.21b.C.5.e, f exempts from the provisions of the Act referenced above, residential structures no more than two (2) stories in height, including apartments containing no more than thirty-two (32) dwelling units or guest units per building. The City's building permit checklist includes an item for "Applicable Seals and Certifications" if required, prior to the issuance of a permit. Most assembly use buildings and larger buildings that involve spans of structural members more than 30 feet may be required to be designed by an Architect or Engineer licensed in the State of Oklahoma.
- 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;
- There are no licensing requirements for builders or professionals except in the case of high-rise structures. The State of Oklahoma does not require a license for general contractors; however, electrical, plumbing, mechanical, sign, driveway and fire suppression system permits can only be issued to contractors licensed in the State of Oklahoma and registered with the City of Oklahoma City. These contractors must be licensed by both the State of Oklahoma and The City of Oklahoma City. Instructions for licensing are available on the City's website.

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

Most of the property used by nonprofit housing developers is either a.) Donated to the City by the Board of Commissioners of Oklahoma County for the expressed purpose of developing affordable housing, or b.) Zoned as infill housing. Property rezoning requires a fee to the developer, and is rarely proposed for affordable housing development. In some rare cases a rezoning request may originate from City Council for the benefit of a nonprofit housing developer. On those occasions, there is no fee charged. City policies support the development of affordable housing; however, the impediments identified above are notable and strategic goals have been pursued by the City to remedy these unintended consequences. Staff will continue to monitor changes in policy or codes that adversely affect affordable housing, and will provide input as necessary on public policy proposals to eliminate or reduce adverse impacts on affordable housing programs

City Council supported changes to the existing Ordinance by passing a revised Ordinance on January 5, 2015. The revised Ordinance updated protected class definitions by adopting age, familial status and

disability as protected classes in City housing protections as recommended by the 2015 Analysis of Impediments. To address the impediments related to outreach and training, City Staff will continue collaborating with community partners such as Neighborhood Housing Services, Legal Aid and Metro Fair Housing, among others. Agencies responsible for providing fair housing trainings have indicated that training events are not well attended. This would seem to indicate a need for an extended marketing effort and/or an improved notification process. Outreach efforts will be re-examined to ensure available resources are being adequately utilized.

The lack of adequate public transportation is a larger City discussion, and is being addressed in the City's new Comprehensive Plan (planOKC), which was adopted during the first Action Year of this Consolidated Plan. There are presently ongoing efforts to increase transit access opportunities for all citizens. Studies have been prepared by the City's transit authority determining which routes should be created or changed to accommodate the most riders, and discussions of increased service in the evenings and on weekends remain ongoing.

The City remains unconvinced by the Analysis of Impediments that current zoning is truly an impediment to fair housing, as no specific ordinances could be identified by the author of the report. All present zoning codes will be holistically reviewed for conformance with the City's recently adopted Comprehensive Plan. This provides the City with an opportunity to identify ordinance language that could potentially create an unintended consequence in the provision of fair housing. If problematic language is found, it will be altered as necessary to ensure compliance and equal opportunity.

Discussion

The City of Oklahoma City remains committed to ensuring equal housing opportunity for all persons. Proposed Action Plan activities for the 2018-2019 Fourth Action Year Plan provide direct funding to the Metropolitan Fair Housing Council for the provision of fair housing training, compliance, and complaint processing functions. Staff will continue to participate in Fair Housing Seminars as part of Fair Housing Month activities, and will continue to monitor affordable housing barriers and provide resources where needed to ensure compliance.

The City contracts with Metropolitan Fair Housing Council (MFHC) using CDBG funds to provide fair housing services to the community.

In the last year Metro processed 493 potential Fair Housing complaints. The majority were filed based on discrimination due to disability. The second largest complaint category was familial status. Of all complaints, thirteen (13) were filed with HUD's Office of Fair Housing & Equal Opportunity for Oklahoma City; One complaint based on disability was settled through a HUD Conciliation Agreement. In addition, MFHC collected \$6,000 this year for complainants through in-House mediations. These processes raise the awareness of Fair Housing Law.

In addition, MFHC conducted Fair Housing/Fair Lending/Renters Rights Seminars to over 320 participants this year and published 4 quarterly newsletters distributed to approximately two hundred (200) individuals, groups and private and public organizations in the City. City staff also participated in

some of these outreach events. These activities speak directly to improving the understanding of and enhance attention to compliance with fair housing law. These important activities will continue in the upcoming year.

Other identified impediments are being addressed by other parts of the City, outside this Action Plan. One of these is zoning, and as a related issue, NIMBYism used to block multi-family development. The City has recently engaged a consulting firm to create a Diagnostic Analysis Plan that will review zoning codes for conformance with the City's new comprehensive plan. This first phase will identify concerns, followed by a 2-4 year process to revise the existing code. This process will encompass changes expected to provide some fair housing relief- to include an emphasis on form-based code that will allow multi-family housing to more readily be constructed in areas currently prohibited. There will also be review of certain practices, such as street design, that drive up housing costs in certain areas.

The City is also passed a Bond issue in the Fall of 2017 that involves adding more sidewalks, adding transit stops, increasing ADA compliance at existing stops, and performing bus system upgrades to advance the public transit system- with focus on improvements identified as the most needed by the citizenry base. Concentration will be placed on low-income areas and employment centers. The Bond also included a \$10M set aside for affordable housing- the first time the City has made such a proposal or investments. City staff and staff of the Alliance for Economic Development, the Oklahoma City Economic Development Trust (OCEDT) and City Council will be involved in funding decisions. Policy is currently being drafted to encourage mixed-income developments in areas accessible to employment, transit, quality schools and grocery stores.