

The City of Oklahoma City

2020-2024 Consolidated Plan and 2020-2021 First Year Action Plan

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



Strategic Plan Submission Date: August 7, 2020



Executive Summary

ES-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). As such the City receives annual formula Community Development Block Grant (CDBG), Home Investments Partnership Program (HOME), Emergency Solutions Grant (ESG) and Housing for Persons with AIDs (HOPWA) grants. As a condition of funding, the City is required to prepare a Consolidated Plan (Plan) every five (5) years for submittal to HUD. The purpose is to provide an updated community-based analysis of current demographic, economic, and public policy trends, and 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. At the end of each fiscal year, the City must prepare a Consolidated Annual Performance Evaluation Report (CAPER) that provides an assessment of annual performance in the context of the five (5) year Consolidated Plan and Annual Action Plan.

The CDBG program goals are to develop viable urban communities by providing safe and decent housing, a suitable living environment, and expanding economic opportunities for low and moderate income persons, Regulations require that each activity undertaken must meet one of 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. HOPWA is the only Federal program dedicated to addressing the housing needs of persons living with HIV/AIDS and their families. ESG 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. This Plan details the City's strategy for meeting National Objectives and HOME program goals, as well as identifying proposed uses for ESG and HOPWA grant funds. The 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 Action Plan Year, funding recommendations are reviewed and vetted according to the goals and objectives of the Consolidated Plan.

New requirements to the Consolidated Plan process as detailed in the Federal Register/Vol. 81, No. 242 dated December 16, 2016 advise that Grantees provide a detailed summary in future Consolidated plans of efforts made to narrow the digital divide and increase resilience to natural hazards. A detailed response to these issues can be found in Appendix 9b.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The 2020-2024 Consolidated Plan contains an assessment of housing and community development needs, as well as those of homeless persons and special populations in Oklahoma City. Priority needs are more particularly described in Table 51 in Section SP-25. These are summarized as follows:

Housing Related Priority Needs

- Affordability of Owner-Occupied Housing
- Supply and quality of Affordable Owner-Occupied Housing
- Supply and quality of Affordable Rental Housing
- Quality of Public Housing
- Supportive Housing for the Chronically Homeless
- Sustainability of Transitional Housing
- Rapid Re-housing for Homeless Households with Children
- Housing Availability for Persons with HIV/AIDS

Non-Housing Priority Needs

- Services for Homeless Youth
- Increased Employment for Continuum of Care Participants
- Public Facilities, Services, and Infrastructure
- Acquisition and Clearance of Vacant and Blighted Property
- Securing Vacant and Abandoned Buildings
- Providing Economic Opportunities for Low and Moderate Income Persons
- Transportation for Special Needs Populations
- Sustainability of Service Providers Facilities and Infrastructure
- Program Administration and Support

Priority needs were established through review of the data presented in the Needs Assessment and Market Analysis based on HUD's data, input from the public, and consultation with local non-profits and service providers. Annual goals in Section AP-20 and the funded activities identified in Section AP-35 are relevant to the First Year Action Plan and will be re-evaluated each year. This Consolidated Plan may

be amended as the City responds to changing market needs, disasters, economic shifts, and community demographics to ensure the best use of limited resources.

In this Plan, The City continues our approach of concentrating resources strategically within the Strong Neighborhood Initiative (SNI) to promote a holistic approach to neighborhood revitalization. In the First Action Plan Year, The City continues to emphasize affordable housing, with specific emphasis on the Neighborhood Revitalization Strategy Area (NRSA). Special consideration will also be given to supporting projects in LMI census areas within the Opportunity Zones (see map in appendices.)

3. Evaluation of past performance

The City's 2015-19 Consolidated Plan called for achieving **housing goals** by providing funding and engaging in program activities that included support for nonprofit and for-profit housing developers to rehabilitate and construct new affordable housing; support for Community Housing Development Organizations 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 for low-income households; support for down payment and closing cost assistance to expand homeownership opportunities for low-income households; and, funding for activities that support the City's housing rehab program, and housing and services for persons with HIV/AIDS.

The goal of providing a **suitable living environment** was addressed in the prior Consolidated Plan and Action Year strategies by continuing ongoing programs that addressed specific community needs. The 2019-20 Fifth Year Action Year strategy called for 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 capacity building activities for neighborhood organizations and CDBG funding to provide neighborhood improvements; activities to address vacant and abandoned housing; removal of graffiti; and, removal of slum and blight conditions in low-income areas.

In addition, the City of Oklahoma City made progress in attaining its goals for **expanding economic opportunities**. The City's Consolidated Plan and Annual Action Year Strategies called for engaging in program activities that provide technical assistance to small businesses in obtaining financing 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

The consultation process for this Plan provided several opportunities for residents, service providers, and others to contribute. In October 2019, the City published Notice of Public Meetings for 4 community input sessions held in various areas of the City in December 2019 and January 2020. Meetings were held in public facilities, with one meeting during the afternoon to accommodate persons

working evening hours. A total of 49 citizens and representatives of local organizations and service providers attended these meetings. Survey forms offering opportunity for feedback and comments were distributed .

Efforts made in understanding barriers to Fair Housing were extensive, conducted by Root Policy Research and EPS, Inc. consulting firms which met with diverse stakeholders in focus groups over a 6 month period. Participants included realtors, bankers, minority residents, lawyers, non-profit housing service and social service providers, Housing Authority representatives, and economic development groups. As part of this effort, a housing survey was developed by EPS to assess the nature and condition of affordable housing. A bilingual survey was sent to random households in different sectors of the City and posted on-line for completion by residents. The analysis of collected data is on-going with final reports and recommendations not expected until summer 2020. Findings may influence this Plan in the future.

Currently there is a high community focus on the homeless population. In the summer of 2019, the Mayor initiated a Homelessness Task Force and the City hired Analytic Insight to assess existing conditions, and to develop a Comprehensive Strategy. Numerous stakeholders have been interviewed, public planning sessions were held, and focus groups convened to examine various aspects of current systems. A Public Forum was held on December 16th, 2020.

In addition to public meetings, opportunity for community input was provided during a public meeting of the Citizens Committee for Community Development meeting held on June 9, 2020. A 5-day Notice seeking public comment on the proposed Action Plan and providing notification of a final public hearing at City Council was published in *The Oklahoman* on July 21, 2020. Staff accepted written correspondence from the public until 5:00 p.m. on June 12, 2020 for inclusion in the presentation to City Council. A final opportunity for input was provided in a public hearing before City Council on July 7, 2020. A summary of community input is attached to this report (Appendix 2) with comments also included in the Analysis of Impediments to Fair Housing Choice document. Consultation with numerous outside agencies and other municipalities is discussed in Section PR-10 of the 2015-2020 Consolidated Plan. The City of Oklahoma City's Citizen Participation Plan is also attached (Appendix 2b)

5. Summary of public comments

The Citizen's Participation Plan was recently amended as part of our FY 2019 Substantial Amendment in response to the COVID-19 CARES Act funding.

Citizen input at the various meetings and forums describe above touched on many different topics which are itemized in the attached Appendix 2; the most common were the role and selection of CHDO's, how best to leverage the new MAPS4 projects, potentially increasing the minimum affordability period for Downpayment Assistance loans, and meeting the increasing need for services to the homeless.

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

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

All comments were received and evaluated. Those not accepted generally proposed ineligible activities that did not meet the regulatory requirements. Others raised concerns about duplication of benefits with other funding sources, or could better be addressed with other available revenue streams.

7. Summary

The citizens of Oklahoma City passed a fourth Metropolitan Area Projects (MAPS) tax referendum estimated at \$978 million which will begin implementation in April 2020 and will continue through 2028. This fourth-generation initiative provides for city-wide park improvements, youth centers, senior wellness centers, transit improvements, sidewalks, bicycle infrastructure, upgrades to Chesapeake Arena, a new animal shelter, a fairgrounds coliseum, a civil rights museum, and a multi-purpose stadium. Unlike previous MAPS initiatives, a portion of the MAPS 4 tax will provide financial support for mental health and addiction services, and domestic violence facilities. It is anticipated that many of these projects will be completed during the 2019-2024 timeframe covered by this Consolidated Plan. Substantial private investment is also planned and underway, and is discussed in more detail in Section MA-45.

Citizen involvement and input from local non-profits and service providers has been instrumental in identifying priority needs, strategic objectives, and funded activities for the First Year Action Plan. A similar public participation process will be used to inform each future Action Year Plan.

A substantial amendment may be required from time to time as the City adapts to changing needs and priorities within an Action Plan year. A substantial amendment to this Consolidated Plan is defined as an amendment that a.) changes the priorities in the 5-Year Strategy; b.) funds a new activity not described in the Action Plan; or c.) increases funding allocated to an activity by more than 25%.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

The following are the agencies/entities 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

The lead agency for overseeing the development of the Consolidated Plan and First 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, Housing & Community Development Manager, The City of Oklahoma City, 420 W. Main Street, Ste. 920, Oklahoma City, OK 73102.

PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(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 City also relies on the Oklahoma City Continuum of Care (CoC) Board which is comprised of several social 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), a formal citizens advisory committee.

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. The City is also collaborating with OCHA about affordable housing needs and priorities. A Substantial Amendment approved by City Council in April 2019 supports a partnership between The City and OCHA to provide property inspections for OCHA housing units; this activity is continued in this Plan

The City interacts routinely with the Oklahoma Housing Finance Authority (OHFA) as we direct clients to Section 8 programs and coordinate data sharing. In the past City grant funds have provided additional funding to support selected LIHTC projects. Also, periodic meetings are held throughout the year with representatives of OHFA, OCHA, the City, and the Alliance for Economic Development to discuss program issues and affordable housing concerns.

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.

Besides the Continuum of Care, 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. In 2019, the Mayor established a new Task Force on Homelessness to examine and address community needs. Task Force members represent a variety of social service agencies including mental health providers, the housing authority, city program staff, and philanthropic funding agencies. A consultant has been hired to examine our local assets and gaps in providing homelessness services to develop a Comprehensive Strategy to address homelessness. Public meetings were included as part of this effort as were a series of workshops held with stakeholders to discuss issues in February 2020. The consultant's report is expected to be completed in July 2020.

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 is the lead agency for the Oklahoma City Continuum of Care (CoC) . The City emphasizes Coordinated Entry through Journey Home OKC, a collaborative initiative that combines the efforts of over 40 government, faith-based, and non-profit organizations to address homelessness. In 2019, over 286 people were housed through Journey Home OKC. The CoC routinely realizes a housing retention rate of over 85%. Housing homeless veterans is an emphasis of the program, and the CoC coordinates with the VA for VASH vouchers and case management, and with Goodwill as the local provider of Supportive Services for Veteran's Families.

Beginning in 2013, the City and our service providers began prioritizing a "housing first" approach for our chronically homeless and homeless veteran populations. We developed a need based coordinated entry program for both populations. Over 1,400 persons have been housed, with a client retention rate between 80-90%. While the City has permanent housing programs that focus on assisting homeless families, the most extensive services are provided via ESG through prevention and re-housing assistance. Families are assessed through the same Coordinated Entry System used for veterans and the chronically homeless. ESG and CoC providers meet several times a month to review and staff cases, generally based on assessment scores. The services provided through ESG are those most often required by homeless families, and generally make supportive housing a necessity. If an individual or family demonstrates they are at imminent risk of homelessness, ESG agencies can address immediate concerns and provide case management to prevent a loss of housing.

Homeless youth may also access housing and services through the Coordinated Entry System and are prioritized for housing based upon their demonstrated level of need. Youth service providers meet monthly to identify staffing needs and assign clients. In the last 5 years, the CoC has seen rapid expansion followed by a contraction in services. A new youth shelter and drop-in center was opened; however, it was unable to sustain operations and closed within a few years. Other organizations are filling the gap by adding shelter beds, and another organization is constructing an emergency shelter and drop-in center. Planning for homeless strategies 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 group advises on Plan objectives to meet the needs of the homeless and those with special needs, including people with HIV/AIDS. The Coalition updates the City's 10-Year Plan to End Homelessness and provides awareness to elected officials, interested parties and the public about homelessness and persons with special needs. Recently, responsibilities have shifted to various groups and committees with specific service focuses. Planning in smaller groups has proved effective.

Over the last 3 years, the CoC has seen significant improvements in efficiency of outreach and shelter services, Point In Time (PIT) planning, and data collection; as well as in housing and case management services for all subpopulations. This can be attributed to the presence of CoC staff on these smaller committees. In collaboration with the City Planning staff and the Homeless Alliance, the Coalition organizes and executes the annual PIT count of the Homeless each January. This information is used in the annual HUD CoC competition. The information obtained from the PIT count is used to establish need and identify current trends, including people who are 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 and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

The Continuum of Care Board oversees and evaluates the housing and service programs funded through the CoC, HOPWA, ESG, and City Social Services. The CoC Board reviews proposals and makes funding recommendations to the City Council. City staff have partnered with the CoC Board to evaluate outcomes, rank potential projects, and determine funding allocations. Outcomes are tracked throughout the year via on-site monitoring and HMIS data reporting.

The geographic area served by ESG is the same as the Oklahoma City Continuum of Care (CoC), and 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 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 as well as 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 to meet the data needs of the CoC. HMIS funding is provided by the City of Oklahoma City, a Continuum of Care program grant, and other funding sources.

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

(Continued on following page)

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?	Housing Need Assessment Fair Housing Enforcement
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email Consultation and Fair Housing Survey participation. Identification of issues related to Fair Housing will inform this Consolidated Plan and future program activities.
2	Agency/Group/Organization	OKLAHOMA CITY HOUSING AUTHORITY
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Needs - Veterans Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	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, veterans' benefits, anticipated funding over the next five (5) years, and anticipated gaps in resources. The City continues to provide CDBG funding to support the rehabilitation of about fifteen (15) public housing units annually 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?	Economic Development Market Analysis

	How was the Agency/Group/Organization consulted and 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 this Consolidated Plan and the first year Action Plan funding allocations
4	Agency/Group/Organization	COMMUNITY ACTION AGENCY OF OKLAHOMA/CANADIAN COUNTIES
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Health Services-Abuse and Addiction Recovery
	What section of the Plan was addressed by Consultation?	Homelessness Needs - Veterans Non-Homeless Special Needs Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Community Action Agency (CAA) was consulted for the homeless housing needs assessment and identification of social services gaps. CAA provides child development services, treatment for substance abuse, economic development loans for small businesses, homebuyer assistance, and emergency repair/weatherization activities for homeowners. CAA is provided with CDBG funding to support emergency home repairs, graffiti removal, and small business services.

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 public meetings and forums, focus groups, and a formal 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	Described in detail in Section NA-40, SP-40, and AP-65

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

Consolidated Plan priority needs, goals and action steps have been provided to the Oklahoma State Department of Commerce (Administers CDBG for State of Oklahoma), adjacent communities (including the City of Midwest City, City of Edmond, City of Norman, and City of Moore), the Oklahoma City Housing Authority (OCHA), Community Action Agency (CAA), and the Association of Central Oklahoma Governments (metropolitan planning agency) for their input with regard to non-housing community development needs and other extra territorial issues that include transportation, workforce development, economic development and the environment. The responses received have been used to inform Plan priorities and proposed funding allocations.

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, deconcentration of 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. 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. An RFP was published in Spring 2019 soliciting proposals for a new housing market study, affordable housing study, and an analysis of impediments to fair housing to support work on the 2020-2025 Five Year Consolidated Plan. A contractor was selected, stakeholder interviews and meetings have been held and the study is well underway. The work on the AI portion is completed; final reports including all aspects of the study are expected in the summer of 2020

Four (4) public meetings were held to discuss the 2020-2024 Consolidated Plan in December 2019 and January 2020 in multiple areas of the City. Attendance at these meetings by local service providers and neighborhood associations included representatives from Community Action Agency, City Care, SISU Youth, United Way of Central OK, The Homeless Alliance, Northcare, Rebuilding Together, Positively Paseo, OKC Metropolitan Area Realtors, HOPE Community Services, Neighborhood Services Organization, Sunbeam Family Services, Jefferson Park Neighborhood Association, Catholic Charities,

Upward Transitions, Economic and Planning Systems, National Women in Agriculture, Northeast OKC Renaissance, Culbertson's East Highland Neighborhood Association, Life Restoration Worship Center, Oklahoma County Health Department, Oklahoma Department of Human Services, U.S. Department of Agriculture, Oklahoma State Department of Health, the Salvation Army, Restore OKC, the Oklahoma state legislature, and representatives from U.S. Congresswoman Kendra Horn's office. Comments and input received during these public meetings are provided in the appendices of this report.

Consultations with area service providers and homeless organizations help 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. The City seeks to identify opportunities for stretching resources such as the elimination of duplicative services. Regional approaches to the provision of social services are 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.

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(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 October 27, 2019. In addition, local stakeholders, non-profit organizations and other interested parties were notified via email on December 5, 2019. Meetings were held in various public facilities between December 2019 and January 2020 at the following locations:

Will Rogers Garden Center, 3400 NW 36th St- Wednesday, December 11, 2019 at 6:30 PM

Sunbeam Family Services, 1100 NW 14th St- Thursday, December 12, 2019 at 3:30 PM

Ralph Ellison Library, 2000 NE 23rd St- Thursday, January 9, 2020 at 6:30 PM

Capitol Hill Library, 327 SW 27th St- Tuesday, January 14, 2020 at 6:30 PM

The citizen participation process and summary of feedback has been fully described in item no. 4 and 5 of the Executive Summary. Feedback received at the public meetings was used in conjunction with quantitative data and current demographics to establish priority needs for this Consolidated 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 hope of creating a noticeable and sustainable community benefit.

Citizen Participation Outreach

1	Public Meeting	Non-targeted/broad community	Four (4) public meetings were held in various public facilities in all quadrants of the City. The Will Rogers meeting held on December 11, 2019 was attended by only 1 citizen and 7 staff members. The Sunbeam meeting held on December 12, 2019 was attended by 21 citizens and 8 staff members. The Ralph Ellison Library meeting held on January 9, 2020 was attended by 20 citizens and 8 staff members. the Capitol Hill Library meeting held on January 14, 2020 was attended by 7 citizens and 9 staff members	Multiple Pages. Attached in Appendix 2	All comments and suggestions were given due consideration in the allocation process
2	Newspaper Ad	Non-targeted/broad community	A thirty (30)five (5) day comment period Notice of public hearing was submitted to Oklahoma Publishing Company (OPUBCO) for publication on March TBD, 2020 and printed on March TBD in the legal notices.	No additional comments were received in response to the published request for public comment about proposed activities.	Not Applicable
3	Public Hearing	Non-targeted/broad community	Public hearing before City Council July 21, 2020.	No additional public comment was received during the public hearing before City Council	Not Applicable

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The Housing Needs section consists of two parts: the estimated housing needs projected for the next five (5) years and an assessment of racial disparities. The most recent (2011-2015) Comprehensive Housing Affordability Strategy (CHAS) data series was the primary source of data used. These data sets (which have been pre-populated from the HUD IDIS database) though somewhat outdated, are the best available. U.S. Census and American Community Survey data were also used to inform the Needs Assessment section of the Consolidated Plan. Annual Action Plans will be written and amended as necessary to adjust housing need priorities that may be identified following the future release of new Census data. Consultation with the Oklahoma City Housing Authority and local service providers were also considered in the final analysis.

The Consolidated Plan Needs Assessment examines the City of Oklahoma City's community-wide needs for housing and community development activities. The empirical data and evaluation of existing plan documents were supplemented with feedback and suggestions received during an extensive public participation process. Public forums were held to receive input from residents, neighborhood associations, governmental entities, and local community organizations. The City also consulted with community stakeholders and service providers to gauge their perception of funding gaps, unmet service needs, and opportunities for public-private partnerships. Upon completion of the public input process, all information received was compiled and analyzed for identification of strategic goals and funding objectives, and prioritized as a high or low priority.

The Needs Assessment section of the Consolidated Plan focuses on evaluating the needs of the following income groups based on Area Median Income (AMI):

- Extremely Low Income (0-30% AMI)
- Very Low Income (30-50% AMI)
- Low Income (50-80% AMI)

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a, b, c)

Summary of Housing Needs

The following data shows that a significant percentage of households (both renters and homeowners) earning less than 30% of the Area Median Income (AMI) suffer from housing problems. The Small Family category (2-4 family members) has the highest percentage of all households. Since, 2009, the population has increased by 5% to 610,670. The total number of households has increased by 6% to 232,255. There are 107,130 households earning less than 80% of area median income (46.1%). Overcrowding (defined in the dataset as more than 1 person per room) is also considered within this category. The data suggests that within all households earning less than 80% AMI, overcrowding is not a significant problem (3.5% for renters; 1.4% for homeowners). According to the data, 60.4% of those earning 80% or less of the area median income are experiencing 1 or more of 4 specific housing problems. These may include the lack of a kitchen or complete plumbing, severe overcrowding and/or severe cost burden. Among renters, Households earning between 0-30% median income carry the highest percentage of households with a cost burden exceeding 30%. For homeowners, cost burden exceeding 30% is also the greatest for households in the 0-30% bracket .). 1449 rental households and 349 homeowners earning less than 80% of median income are experiencing at least one housing problem such as incomplete kitchen and/or plumbing facilities, and are living in substandard housing conditions.

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	579,999	610,670	5%
Households	220,076	232,255	6%
Median Income	\$42,181.00	\$47,779.00	13%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	33,475	30,250	43,405	22,860	102,230
Small Family Households	11,140	11,145	15,875	8,965	51,815
Large Family Households	2,754	3,350	4,170	2,050	7,805
Household contains at least one person 62-74 years of age	4,525	5,168	7,180	4,305	20,140
Household contains at least one person age 75 or older	2,697	3,860	5,055	2,244	7,109
Households with one or more children 6 years old or younger	7,683	7,734	8,640	3,864	11,702

Table 6 - Total Households Table

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	604	385	460	55	1,504	154	110	85	64	413
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	410	140	360	190	1,100	105	55	130	80	370
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	1,025	1,205	580	120	2,930	240	479	495	270	1,484
Housing cost burden greater than 50% of income (and none of the above problems)	15,065	4,325	895	160	20,445	4,435	3,085	1,640	560	9,720

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	2,575	8,515	6,865	685	18,640	1,359	3,264	5,660	2,610	12,893
Zero/negative Income (and none of the above problems)	2,355	0	0	0	2,355	905	0	0	0	905

Table 7 – Housing Problems Table

Data 2011-2015 CHAS

Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	17,110	6,055	2,285	525	25,975	4,935	3,730	2,345	980	11,990
Having none of four housing problems	5,330	12,035	19,735	8,770	45,870	2,850	8,420	19,035	12,585	42,890
Household has negative income, but none of the other housing problems	2,355	0	0	0	2,355	905	0	0	0	905

Table 8 – Housing Problems 2

Data 2011-2015 CHAS
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	7,345	5,985	2,749	16,079	1,770	2,379	3,153	7,302
Large Related	1,715	1,105	430	3,250	544	958	745	2,247
Elderly	2,709	2,180	1,443	6,332	2,213	2,289	2,134	6,636
Other	7,470	4,620	3,479	15,569	1,548	959	1,365	3,872
Total need by income	19,239	13,890	8,101	41,230	6,075	6,585	7,397	20,057

Table 9 – Cost Burden > 30%

Data 2011-2015 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	6,390	1,655	129	8,174	1,335	1,235	549	3,119
Large Related	1,310	220	15	1,545	379	234	155	768
Elderly	2,064	1,020	694	3,778	1,515	1,079	614	3,208
Other	6,500	1,515	210	8,225	1,355	559	325	2,239
Total need by income	16,264	4,410	1,048	21,722	4,584	3,107	1,643	9,334

Table 10 – Cost Burden > 50%

Data 2011-2015 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	1,270	1,090	760	220	3,340	270	500	430	265	1,465

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Multiple, unrelated family households	149	195	105	90	539	75	59	195	110	439
Other, non-family households	10	90	85	0	185	0	0	0	0	0
Total need by income	1,429	1,375	950	310	4,064	345	559	625	375	1,904

Table 11 – Crowding Information – 1/2

Data 2011-2015 CHAS
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Alternate Data Source Name:

2018 American Community Survey- 1 yr estimates

Table 12 failed to pre-populate data for households with children, by income and ownership status. The 2018 ACS 1-year Estimates for Households and Families(report no. S1101) provides significant data, including households with children by age demographics. Please note that this data is based on national averages and is not specific to the Oklahoma City area. The data reflects that 30.3% of total households have children present in the home. Household income of the families is unknown and there does not appear to be an alternate data source that provides the data in the format requested in the table (i.e. Households with children by household income and rental/homeownership status). It can be presumed that monthly housing costs and household income are comparable to that of households without children; however, it remains unclear whether an overcrowding issue exists as the number of bedrooms for each occupant is not available in the dataset.

Data Source
Comments:

Describe the number and type of single person households in need of housing assistance.

The American Community Survey 2018 1-YR Estimates for Households and Families indicate that non-family households account for 34.82% of all households. Of this amount, 28% are identified as "Householder living alone." Median household income for all households in Oklahoma City according to the ACS 1-Year Estimates is \$53,973 as opposed to \$37,965 for non-family households.

The maximum HOME program income limit in 2019 for a one (1) person household is \$41,350 @ 80% AMI and \$31,020 @ 60% AMI. This would indicate that one (1) person households will have a housing cost burden exceeding 30% of monthly income if housing costs including utilities exceed \$1,033 per month @ 80% AMI or \$775 per month @ 60% AMI

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

The total number of cases of those seeking housing assistance due to domestic violence had been increasing in Oklahoma City annually until 2015. Since that time though, the number of cases has fluctuated between approximately 115 and 200 per year. These numbers reflect active cases only. The actual number of domestic violence victims is difficult to ascertain due to the inability and/or unwillingness of victims to seek the necessary help and resources. According to the 2019 Point-in-Time (PIT) Survey, there were 117 people identified as homeless due to domestic violence. This is the same number reported the previous year but represents a decrease from 209 in 2015.

The victim service provider that the Oklahoma City CoC has partnered with to address this issue is the Young Women's Christian Association (YWCA). The YWCA is networked at the state/local level and licensed to provide services to persons that are victims of domestic violence. Program oversight and funding for services are provided through the Oklahoma Attorney General's office. The YWCA provides the only certified shelter for battered women and their children in Oklahoma County. It is estimated that 33% of all police time is spent responding to domestic disturbance calls. Between 30-60% of children in domestic violence situations are abused. Nearly one third of all domestic violence homicides are witnessed by children. Youth who witness domestic violence are an increased risk for suicide and substance abuse. Many of them repeat the learned pattern of violence in their adult relationships.

The City of Oklahoma City works closely with the YWCA to provide supportive services to victims of domestic violence. Currently, the YWCA operates a shelter and provides supportive services for individuals and children fleeing domestic violence. In 2017, Palomar, Oklahoma City's Family Justice Center was opened. Palomar utilizes a centralized "one-stop shop" collaborative model that connects community service agencies to individuals and families that have been affected by violence. The services and advocacy are provided at no cost to the client.

What are the most common housing problems?

Substandard housing continues to be problematic, especially for renters in the lowest income brackets. Overcrowding for households earning less than 50% of median income is a concern, even when no other substandard housing problems exist. Housing costs burden greater than 50% is extremely high for rental households earning less than 30% AMI (75.4%). On the homeownership side, 51% of Small Related households earning between 50-80% AMI have a cost burden exceeding 30%. Apart from the data presented, vacant and abandoned buildings in urban neighborhoods continue to devalue surrounding property and create concerns about citizen safety and increased taxpayer expense for emergency response.

In the last five years, families with children have become the fastest growing sub-population of homeless. Oklahoma City has focused efforts through ESG and the short-term HPRP funding (now ended) with the intention of decreasing the number of families with children that enter shelters. The

most recent PIT count indicates that the number of families with children in shelters has decreased 20%. When considering the recent downturn in the economy, rising unemployment and the increase in the number of foreclosures, the efforts made through the targeted initiatives have had a significant positive impact on this population.

Are any populations/household types more affected than others by these problems?

As can be expected, those households at and below 30% AMI experience overcrowding, substandard housing conditions, and very high housing costs burden in excess of 50% at a much higher rate than other income demographics. This is especially true for renters. Homeowners tend to experience these issues more frequently when earning between 50-80% AMI. This differential can be primarily attributed to the inability of households below the 80% income level to qualify for mortgage financing, resulting in an inability to achieve homeownership.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Individuals and families that are currently housed but are at risk of losing that housing most often need the type of assistance that the Emergency Solutions Grant (ESG) program provides. Being behind on rent or utility payments is often the cause of evictions. These individuals may initially need to be connected with ESG assistance in order to stabilize. Many of the families who need prevention resources to remain housed are at or below 30% AMI. Often, their needs are exacerbated by an acute circumstance that leads to an imminent risk of homelessness, such as job loss, change in relationships, domestic violence, and/or sudden illness.

Families in need of rapid re-housing assistance, and also those with assistance that is terminating, need a source of revenue and often times assistance to address other contributory issues. Other identified needs may include transportation needs, mental health and/or substance abuse treatment, parenting skills, supplemental income while in treatment or temporarily disabled, or employment. All households receiving ESG assistance work with a case manager to address the issues jeopardizing their housing.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

"At-risk population" is defined as individuals and families who are currently housed, but are at risk of becoming homeless without immediate financial assistance. Estimates are generated from

requests made for ESG assistance, consultation with service providers and recipients of HOPWA Tenant Based Rental Assistance and Short Term Rent, Mortgage and Utility Assistance.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

The rental market in Oklahoma is at very low capacity overall, and particularly for individuals with low incomes. Individuals and families living in some of the most cost-efficient units often find they are no longer able to afford them as housing demand increases leading to rising rents. The inability to make rental security deposits and utility deposits is often a barrier to those households who are being evicted or are attempting to locate a cheaper housing option. Short term assistance is often the difference between maintaining shelter and avoiding homelessness.

Discussion

The prevention of homelessness and rapid re-housing remain high priorities in this Strategic Plan. The Continuum of Care and local service providers continue to look for new ways to stretch limited resources. The City and local service agencies continue to emphasize and employ the Housing First model to address immediate housing needs. Case manager capacity and insufficient funding continue to limit our ability to fully address the needs of those who are experiencing, or at risk of experiencing homelessness. It is seldom an individual circumstance such as job loss, mental illness, physical illness, substance abuse, disaster, loss of a loved one, etc. that leads to housing instability or homelessness. It is most often individual circumstances in combination with structural factors such as the cost of housing, and system failures such as aging out of the foster care system, being discharged from a hospital/prison/other institution, etc. which ultimately leads to people becoming under-housed or homeless.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

An analysis of the 2011-2015 Comprehensive Housing Affordability Strategy (CHAS) tables for the Oklahoma City area as reflected below show disproportionately greater need for persons experiencing **housing problems** among five (5) different minorities and ethnicities, and within various income demographics. The four housing problems included in the data analysis include lack of complete kitchen facilities, lack of complete plumbing facilities, more than one person per room, and housing **cost burden greater than 30%**. A "disproportionately greater need" exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10% or more) than the income level as a whole.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	25,975	4,245	3,260
White	11,145	2,105	1,525
Black / African American	7,309	1,160	1,100
Asian	493	119	209
American Indian, Alaska Native	968	165	55
Pacific Islander	40	0	0
Hispanic	4,659	405	204

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	21,560	8,685	0
White	10,420	4,754	0
Black / African American	4,219	1,453	0
Asian	478	299	0
American Indian, Alaska Native	474	244	0
Pacific Islander	15	0	0
Hispanic	5,013	1,588	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	17,160	26,235	0
White	10,305	14,805	0
Black / African American	2,880	4,079	0
Asian	610	680	0
American Indian, Alaska Native	447	668	0
Pacific Islander	0	14	0
Hispanic	2,250	4,624	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,805	18,060	0
White	3,235	11,099	0
Black / African American	645	2,514	0
Asian	220	754	0
American Indian, Alaska Native	60	580	0
Pacific Islander	0	0	0
Hispanic	529	2,360	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

Discussion

In the 0-30% AMI bracket, no disproportionate needs related to housing problems have been identified among different ethnicities. The percentage of households city-wide that report one (1) or more of the four (4) housing problems is 95%. For those households earning between 30-50% AMI, disproportionate needs also exist for Black/African American households. Black families have 19.6% greater housing problems than the general populace as a whole. No disproportionate needs have been identified in the 80-100% AMI category and each ethnic minority group experiences housing problems in a similar manner as the general population.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

An analysis of the 2011-2015 Comprehensive Housing Affordability Strategy (CHAS) tables for the Oklahoma City area as reflected below show disproportionately greater need for persons experiencing **severe housing problems** among five (5) different minorities and ethnicities, and within various income demographics. The four housing problems included in the data analysis include lack of complete kitchen facilities, lack of complete plumbing facilities, more than one person per room, and housing cost burden **greater than 50%**. A "disproportionately greater need" exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10% or more) than the income level as a whole.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	22,045	8,180	3,260
White	9,295	3,955	1,525
Black / African American	6,199	2,280	1,100
Asian	443	160	209
American Indian, Alaska Native	883	250	55
Pacific Islander	40	0	0
Hispanic	3,990	1,074	204

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	9,785	20,455	0
White	4,890	10,284	0
Black / African American	1,774	3,898	0
Asian	203	564	0
American Indian, Alaska Native	234	484	0
Pacific Islander	15	0	0
Hispanic	2,198	4,409	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,630	38,770	0
White	2,555	22,575	0
Black / African American	559	6,405	0
Asian	239	1,040	0
American Indian, Alaska Native	83	1,037	0
Pacific Islander	0	14	0
Hispanic	990	5,889	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,505	21,355	0
White	810	13,529	0
Black / African American	139	3,019	0
Asian	90	884	0
American Indian, Alaska Native	20	620	0
Pacific Islander	0	0	0
Hispanic	409	2,475	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

In the 0-30% AMI bracket, a disparate need is represented by the Black/African American population of which 28.1% report one or more of the four housing problems noted in the introduction section above. For those households earning between 30-50% AMI, the Black/African American population reflects a disproportionately high rate of 18.1% reporting at least one (1) of the four (4) housing. No disproportionate needs have been identified in the 50-80% and 80-100% AMI categories and each ethnic minority group experiences housing problems in a similar manner as the general population.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

An analysis of the 2011-2015 Comprehensive Housing Affordability Strategy (CHAS) tables for the Oklahoma City area as reflected below show disproportionately greater **housing cost burdens** at varying levels among five (5) different minorities and ethnicities. A "disproportionately greater need" exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10% or more) than the income level as a whole.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	158,760	37,744	32,200	3,530
White	108,105	21,245	16,145	1,575
Black / African American	18,680	7,075	8,110	1,205
Asian	5,530	1,215	615	254
American Indian, Alaska Native	3,795	898	1,049	55
Pacific Islander	35	25	30	0
Hispanic	16,564	5,924	4,569	249

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2011-2015 CHAS

Discussion:

The CHAS data suggests that Black/African American households experience a cost burden in excess of 50% at a somewhat disproportionately greater rate (14.8%) than the general populace Hispanics also experience a disproportionately greater cost burden at 11.8% above that of the general population.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

As noted previously, the following ethnicities in the 30-50% AMI category have reported one or more housing problems indicating a disproportionately greater need than the general population: Black/African American (14.8%), and Hispanic (11.8%).

If they have needs not identified above, what are those needs?

It is apparent from public meeting input that African American communities continue to feel disenfranchised and marginalized. Fears of gentrification and lack of response to capital improvement needs were common themes related to Staff during the public participation process. There remains a general distrust of government due to the historical implications of past urban renewal failures, and miscommunication or non-communication with minority neighborhoods during more recent high profile development projects.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

Geographically, low income households are located throughout the metropolitan area; however, a significant concentration of Black and African Americans remain in the northeast quadrant of the City. Although the African American/Black population changed little between the 2000 and 2010 Census as a share of the City's overall population, these families remain disproportionately concentrated in Census Tracts to the east and northeast of the city center. As the Hispanic population grew in absolute numbers and as a share of the population, the number of Census tracts with high concentrations of Hispanic residents also grew. However, such tracts tend to be located next to tracts with relatively high shares of Hispanics in 2000, which were clustered to the southwest and west of the downtown area. New census data will be collected in 2020 and released in the early years of this Consolidated Plan. Staff will analyze this data as it becomes available to determine if further changes are needed to our Plan priorities.

NA-35 Public Housing – 91.205(b)

Introduction

An overview of the Oklahoma City Housing Authority from the Public and Assisted Housing section (91.110b) is as follows:

The PIC (PIH Information Center) data reflected in the following tables has been verified and updated with input from the Oklahoma City Housing Authority (OCHA). OCHA has a total of 4,216 total vouchers in use for project and tenant-based units. 4,035 of these are tenant based and 181 are project based. Average annual income of the tenants is \$9,493. A total of 687 are elderly program participants at least 62 years of age and 1,189 are disabled. 1,453 public housing residents (50%) and 1,352 voucher holders are White (33.9%), 1,305 public housing residents (44%) and 2,430 voucher holders (60.9%) are Black/African American. 30 public housing residents and 47 voucher holders identify as Asian. 178 public housing residents and 160 voucher holders identify as American Indian/Alaska Native. Other ethnicities account for less than 1% of all voucher holders. 16% of public housing residents and 4% of voucher holders self-identify as Hispanic.

OCHA administers 4,216 Section 8 Housing Vouchers. It is unknown if they will have a loss of funding over the five (5) year period covered by this Consolidated Plan resulting in a loss of vouchers. The Public Housing program has site-based waiting lists. As of February 2020, a total of 8,325 households are waiting for Senior/Disabled properties. For family properties, there are currently 13,169 families waiting for 1-bedroom homes, 4,590 waiting for 2-bedroom homes, 3,296 waiting for 3-bedroom homes, 704 waiting for 4-bedroom homes, and 125 waiting for 5-bedroom homes. Families can sign up on multiple lists, therefore many of those waiting may be duplicated between categories. As such, it is not possible to provide an exact number of those in need of units, but the need is demonstrably significant. The average waiting period for a public housing unit is estimated at three (3) years for families applying at the time of reporting. While the turnover rate for vouchers remains high, the rate has steadily decreased over the previous five (5) years.

OCHA has set a goal of assisting ten (10) families in achieving homeownership each year through the Housing Authority Family Self-Sufficiency Program and the Housing Authority Homeownership Program. The Family Self-Sufficiency Program (FSS) is a five-year program where voluntary participants, in the Housing Choice Voucher Program (Section 8), enter a program designed to reduce the participant's dependency on public assistance. Families are assisted in meeting goals of a service plan created for each family.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	4	2,999	3,989	7	3,728	67	99	32

Table 22 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	
Average Annual Income	0	9,023	9,260	9,493	9,243	9,374	11,803	8,094	
Average length of stay	0	6	4	5	2	5	0	2	
Average Household size	0	1	2	2	1	2	1	3	
# Homeless at admission	0	0	0	0	0	0	0	0	
# of Elderly Program Participants (>62)	0	0	828	499	1	471	13	0	
# of Disabled Families	0	4	625	1,189	6	1,106	17	7	
# of Families requesting accessibility features	0	4	2,999	3,989	7	3,728	67	99	

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project-based	Tenant-based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	2	1,584	1,352	5	1,222	27	50	22
Black/African American	0	2	1,204	2,430	2	2,311	37	41	9
Asian	0	0	42	47	0	43	1	3	0
American Indian/Alaska Native	0	0	169	160	0	152	2	5	1
Pacific Islander	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	631	177	0	164	0	7	0
Not Hispanic	0	4	2,368	3,812	7	3,564	67	92	32

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

At the present time, OCHA reports there are five (5) residents awaiting transfer to an accessible unit. In some cases, OCHA can accommodate the tenant with minor modifications to an available unit. Approximately 10% of available units are handicapped accessible. Many times, apartments are leased to a current tenant who has aged in place and now requires features that were not needed at the time of move-in. Units are modified as resources allow.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

There are presently 5 residents waiting on a transfer to a Section 504 accessible unit. There are 8,325 households on a waiting list for Senior/Disabled properties. There are 13,169 families waiting for 1-bedroom homes, 4,509 waiting for 2-bedroom units, 3,296 waiting for 3-bedroom homes, 704 waiting for 4-bedroom homes, and 125 on a waiting list for 5-bedroom homes. Families may sign up for multiple lists, therefore these numbers can be highly duplicative and do not represent the actual individual households in need of assisted units.

Consultation with OCHA reveals the greatest needs at the present time are onsite mental health services, onsite health and wellness prevention services, access to quality healthcare, early childhood school readiness, employment education, and financial literacy. As noted in the introduction above, there are large waiting lists for public housing units and additional Section 8 vouchers.

Capital improvements are also a pressing need. OCHA at the time of this report, had a backlog of modernization needs in excess of \$20 million, primarily due to the aging of properties. Capital Funds provided annually by the U.S. Department of Housing and Urban Development (HUD) have decreased substantially in recent years. The cost of deferred maintenance exacerbates the existing problems and ultimately requires more costly repairs as properties continue to deteriorate. Regularly scheduled maintenance and immediate correction of property deficiencies requires less monetary investment than crisis remedies.

How do these needs compare to the housing needs of the population at large?

The need for available affordable units mirrors that of the general population. The need continues to exceed available resources. Market rate rental units generally do not maintain a waiting list and units can typically be occupied within 60 days. The need for capital improvements in public housing units is greater than that of the general population due to OCHA's reliance on HUD funding to meet ongoing property concerns. The private market by contrast is generally supported by the ability to increase gross rents in response to decreasing cash flow. In addition, the availability of private capital and the ability to borrow against equity at favorable loan terms provides a cushion of protection from rising maintenance costs.

Discussion

Increased funding for Section 8 continues to be a significant need. In addition, the wait list for public housing units continues to grow and presently demand is significant for families and seniors.

Concentration of low income housing continues to be problematic for the City in terms of creating mixed-income housing throughout the urban core. The concentration of public housing and Section 8 units in low-income census tracts exacerbates social issues in impoverished neighborhoods and fails to provide a healthy environment for personal improvement.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

Oklahoma City has focused on housing for individuals who are chronically homeless through funding from the HUD CoC competitive grant. Using the annual PIT as a gauge of the needs of the chronically homeless, the City through community partnerships has worked to create permanent supportive housing beds in its efforts to eliminate homelessness. The community has implemented a Coordinated Entry System which allows programs to house the most vulnerable clients first.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	4	355	623	229	299	7
Persons in Households with Only Children	0	8	27	8	8	90
Persons in Households with Only Adults	264	745	6,330	1,516	1,516	173
Chronically Homeless Individuals	90	220	562	96	96	730
Chronically Homeless Families	0	3	12	1	1	730
Veterans	35	123	746	210	210	173
Unaccompanied Child	0	8	27	8	8	90
Persons with HIV	3	20	99	21	21	174

Table 26 - Homeless Needs Assessment

Alternate Data Source Name:
The City of OKC CoC and ESG Service Providers
Data Source
Comments:

Indicate if the homeless population is: All Rural Homeless Partially Rural Homeless Has No Rural Homeless

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Not applicable. Data has been provided in table above.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	568	174
Black or African American	241	104
Asian	2	3
American Indian or Alaska Native	35	65
Pacific Islander	0	1
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	72	39
Not Hispanic	817	345

Alternate Data Source Name:
 The City of OKC CoC and ESG Service Providers
Data Source
Comments:

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

The City estimates that there are approximately 240 families in need of housing on any given night, forty (40) of which are families of veterans. Most families experiencing homelessness will likely require prevention or rehousing assistance through the Emergency Solutions Grant (ESG), or through another financial source providing a similar type of support. Only a small number of chronically homeless families have been located during the annual Point-in-Time count. These families are assessed and housed when determined to be in the direst need. Goodwill currently assists a small number of families of veterans with housing and services funded through the Supportive Service for Veteran's Families (SSVF) grant.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

In the table above, it is reported that 62% of the homeless population is White, 29% is Black/African American, 8% is American Indian and 9% have self-reported as multi-racial, although the table in IDIS does not capture this population. These numbers suggest Black/African Americans experience homelessness disproportionately. Nine percent of Oklahoma City’s homeless population are Hispanic suggesting homelessness affects persons from all ethnic backgrounds proportionately.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Based upon the 2019 PIT count, an estimated 766 adults are sheltered on any given night. An additional 376 remain unsheltered. Approximately seventy-eight (78) of those sheltered are chronically homeless

and ninety-seven (97) are Veterans. Seventy-one (71) sheltered households have children present. Three (3) of these families are chronically homeless.

Discussion:

The prevention of homelessness and rapid re-housing with associated supportive services remain high priorities in this Strategic Plan. Collaboration between the City and local service providers is ongoing. The City remains the lead entity in management of the Continuum of Care Board. Activities included in this Consolidated Plan include, STRMU and TBRA assistance, funding for case management resources, and rapid-rehousing for families with children. In addition, multiple service providers are assisted with ESG, HOPWA and Continuum of Care grants to address social service needs.

To address the growing challenges with homelessness on our community, the Mayor's Task Force on Homelessness was launched in April 2019. In December, 2019 The City of Oklahoma City began formalizing a Comprehensive Strategy to prevent, respond to, and combat Homelessness. Analytic Insight was contracted to guide the study, which is expected to be completed in summer 2020. Multiple strategic planning sessions between Analytic Insight, City staff and local service providers were held to identify measurable goals and priorities that are realistic and achievable. Progress will be reported annually in the Consolidated Annual Performance and Evaluation Report (CAPER).

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

Priorities are assigned to objectives based on the availability of funds and on the needs identified within the community. Objectives that are ranked as high priority will be addressed through funding program activities in the Annual Action Year Plans. The non-homeless special needs population objectives focus on maintaining the ability of non-homeless special needs populations to continue independent living. Persons with HIV/AIDS and their families who are not homeless often have need of supportive services.

Services are available to assist the elderly and persons with disabilities, many of whom need transportation services. During the term of the previous 5-year Consolidated Plan, CDBG funds were provided to subsidize taxi fares and bus coupons for special needs populations, including the elderly over age 62, persons who are disabled, and the homeless. CDBG funds will continue to be allocated for this purpose through the Central Oklahoma Transportation and Parking Authority (COTPA) Share-a-Fare program.

Although this section specifically addresses non-homeless special needs, the annual PIT count of the homeless remains a valuable tool in identifying the needs of domestic violence victims. In 2020, 128 individuals (8% of the homeless population) reported experiencing domestic violence. Many of these individuals were unable to obtain safe and secure housing options after removing themselves from a threatening environment. The total number of cases involving domestic violence has been increasing in Oklahoma City each year. National statistics demonstrate that increases in domestic violence cases can be attributed to a high rate of poverty or significant economic stress such as job loss. We expect these trends to continue.

The primary obstacle to meeting underserved needs is funding availability. The City is not allocating HOME funds for Tenant Based Rental Assistance in the First Annual Action Year Plan, but may be considered in future program years under this Consolidated Plan. Federal grant funds from the City's CDBG and HOME formula grants are used to fund the non-homeless needs activities identified in the Consolidated Plan. State agencies use their allocated funds to provide services to some of the recipients, and private donations to nonprofits help support the facility operations.

HOPWA

Current HOPWA formula use:	
Cumulative cases of AIDS reported	3,221
Area incidence of AIDS	71
Rate per population	5
Number of new cases prior year (3 years of data)	218
Rate per population (3 years of data)	1
Current HIV surveillance data:	
Number of Persons living with HIV (PLWH)	2,773

Current HIV surveillance data:	
Area Prevalence (PLWH per population)	201
Number of new HIV cases reported last year	111

Table 27 – HOPWA Data

Alternate Data Source Name:

The City of OKC CoC and ESG Service Providers

Data Source Comments:

HIV Housing Need (HOPWA Grantees Only)

Type of HOPWA Assistance	Estimates of Unmet Need
Tenant based rental assistance	0
Short-term Rent, Mortgage, and Utility	0
Facility Based Housing (Permanent, short-term or transitional)	0

Table 28 – HIV Housing Need

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

Describe the characteristics of special needs populations in your community:

According to the 2019 Point In Time count, the homeless population on a single day in Oklahoma City numbers approximately 1,273, 30% of whom are unsheltered. Males comprise 69% of the population, females 30%, and 1% are transgendered. 24% are over the age of 55, while 58% are white, 27% black, and 8% Native American. 16% of all people surveyed were in families, 31% of people reported having a severe mental illness and 34% reported suffering from substance abuse. 10% of all people counted were veterans and 22% were chronically homeless. 76% reported being involved with the justice system at some point in their life, which either contributed to their homelessness or was a direct result of it.

While only 24 people who are homeless reported having HIV/AIDS, a significantly higher number of people who are not homeless requested assistance through the City’s HOPWA program which served over 200 people with housing assistance and/or services. Additionally, while only 9% of people surveyed indicated they were homeless as a result of domestic violence, providers assessed over 900 people last year who reported the same, 80% of who required intensive services.

What are the housing and supportive service needs of these populations and how are these needs determined?

The Community Development Division of the Oklahoma City Planning Department, as the Continuum of Care lead, developed the City’s Coordinated intake system for homeless services. All housing service providers, whether federally funded or not, participate in the system and are required to utilize the CoC’s assessment tool to determine every client’s level of need. The assessment used by the CoC is the

Vulnerability Index Service Prioritization Decision Assistance Tool (VI-SPDAT). This assessment tool produces a comprehensive inventory of every client's health issues plus other contributing factors to determine the intensity of housing and services required to maintain housing. A score is generated based on those factors. Clients with higher scores are prioritized for housing. The overwhelming number of people served by these programs require permanent supportive housing assistance with case management. However, this may be contributed to the amount of assistance available for other services. The City's largest emergency shelter is currently at capacity and only a fraction of the clients served are chronically homeless. Additionally, the primary services requested through the City's 211 provider are for rental and utility assistance. This, coupled with the increase in unsheltered homelessness in Oklahoma City in recent years, would indicate there is a significant need for more intensive supportive housing for the most severe client cases and, in the absence of a significant increase in the supply of affordable housing, an expansion of prevention and re-housing resources to reduce the inflow to homelessness.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

According to the 2018 HIV Surveillance Report released by the Center for Disease control (CDC), the cumulative number of people living with HIV/AIDS in Oklahoma City is 3,221, an increase of 71 new diagnoses that year. In that same year, the HOPWA program served an estimated 7% of the total cumulative cases and 24 people surveyed during the City's Point In Time homeless census reported having an HIV/AIDS diagnosis. Most HOPWA beneficiaries are single and, similar to other housing assistance programs, rent & utility assistance along with supportive services are the most frequent services needed. This would suggest that most people with HIV/AIDS in need of housing assistance are not in need of intensive services.

Discussion:

Activities funded for the non-homeless special needs population include the Central Oklahoma Transportation and Parking Authority (COTPA) Share-a-Fare program which provides subsidized bus and taxi fares for special needs persons. In addition, more favorable loan terms are provided to non-profit organizations serving special needs populations for construction and rehab housing projects. CDBG funding has been allocated to assist local non-profits and service providers, youth in foster care, and domestic violence victims. It is anticipated that the non-homeless special needs population will be assisted in each Action Plan year as resources allow.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction’s need for Public Facilities:

Oklahoma City communities have an ongoing need for public facilities to provide community- wide benefit in low to moderate income neighborhoods. The City has historically restricted these improvements to the NRSA and SNI neighborhoods. Public facilities improvements supported in this Consolidated Plan include neighborhood-led projects within the SNI neighborhood boundaries and park improvements. Other public facility projects that support special populations may be considered, including but not limited to facilities for the disabled to support employment and daily needs education, improvements to a care center for abused children, an assisted living facility, development of drop-in centers, overnight shelters for homeless youth, and/or exploration of alternatives for future program activities that address the need for relocation, emergency shelter, counseling, and/or permanent supportive housing for victims of domestic violence.

How were these needs determined?

While all SNI public facility projects are initially requested by neighborhood residents through a public participation process, the decision on whether to fund them is based on several factors, including:

- Whether the facility already exists
- If so, the condition of the facility
- Anticipated need and number of end users
- Whether a public benefit is provided
- Whether the estimated cost to construct or repair the facility is reasonable
- Whether the project contributes to an overall goal of neighborhood reinvestment
- Anticipated maintenance costs and operational responsibilities over time
- Whether the responsible department or organization has the capacity to complete and oversee the project, and
- Whether there are potential adverse impacts to the health and safety of neighborhoods or individuals.

The other social service needs mentioned were identified through funding requests and input from the public and provider organizations during Consolidated Plan development. These projects will be entertained through an open RFP process, and evaluated based on the strength of proposals received, the capacity of the operating organization, and the availability of funds.

Describe the jurisdiction’s need for Public Improvements:

The most pressing need for public improvements in Oklahoma City neighborhoods is public infrastructure; specifically, the construction of sidewalks and adequate street lighting. The municipal boundaries of Oklahoma City contain a geographical area of 621 square miles, making it very difficult to

meet ongoing maintenance needs for public infrastructure. This large service area provides unique challenges in terms of both administrative and financial resources, and the City's capacity to keep pace with needed repairs is limited. Citizen surveys and comments received at public meetings continually identify sidewalks, lighting, and road repairs as primary needs.

Public improvement activities proposed in this Consolidated Plan include construction of sidewalks, tree planting, and park improvements in) SNI neighborhoods. Infrastructure may also be needed in other low-moderate income areas for park improvements, or to support development of affordable housing and/or housing for seniors.

How were these needs determined?

While all SNI public improvement projects are initially requested by neighborhood residents through a public participation process, the decision on whether to fund them is based on several factors, including:

- Whether the requested improvements already exist
- If so, their current condition
- Anticipated need and number of end users
- Whether a public benefit is provided
- Whether the estimated cost to construct or repair the public improvement is reasonable
- Whether the project contributes to an overall goal of neighborhood reinvestment
- Anticipated maintenance costs over time
- Whether the responsible department or organization has the capacity to complete and oversee the project, and
- Whether there are potential adverse impacts to the health and safety of neighborhoods or individuals.

The other needs mentioned were identified through input from the public and developers during Consolidated Plan Development. All projects will be evaluated based on the strength of proposals received, the capacity of the operating organization, and the availability of funds. Considerations for funding non-housing projects include whether the project 1) serves a special needs population; 2) is in an underserved area; 3) will have a significant catalytic effect on investment; 4) promotes social equity; and/or 5) supports historic preservation.

Describe the jurisdiction's need for Public Services:

The demand for public services always exceeds available resources due to the CDBG 15% public services cap. With a temporary waiver from HUD of the public service cap in the First Action Year under this plan, additional public service activities have been funded to respond to the COVID-19 pandemic. The City of Oklahoma City, as a matter of practice, rarely provides funding for administrative costs and salary expense due to the continued expectation of funding over time. In an era of declining resources, the

inability to meet continued administrative expectations of an organization may jeopardize jobs and place the long-term sustainability of an organization at risk.

The City does, however, support many worthy activities, and will continue to do so over the life of this Plan. Public service activities included in this Strategic Plan include hazardous tree removal, public services education for youth, crime and health topics, legal assistance to prevent foreclosures and evictions and summer & after school programs in the SNI neighborhoods.

How were these needs determined?

While all public services projects are initially requested by neighborhood residents through a public participation process, the decision on whether to fund them is based on several factors, including:

- Whether the service already exists
- If so, the adequacy and viability of the service provided
- Anticipated need, demand and number of persons to be served
- Whether a public benefit is provided
- Whether the estimated cost of the requested service is reasonable
- Anticipated operational and monitoring responsibilities over time, and
- Whether the responsible department or organization has the capacity to manage and oversee the program

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The purpose of the Market Analysis is to provide a clear picture of the environment in which the City must administer their programs over the five (5) year Consolidated Plan period. In conjunction with the Needs Assessment, the Market Analysis provides the basis for the Strategic Plan and Projects/Activities to be funded and administered. General characteristics such as housing costs, market demand, area demographics, type and condition of existing housing stock, planned development, and current economic conditions all provide a snapshot of community needs and opportunities, and have been considered in the development of this Plan.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

A variety of housing types for both rental and purchase, are available within the Oklahoma City metropolitan area at a wide range of sales prices and rents. The local housing stock includes single family residences, duplexes, row houses, multifamily apartment complexes, condominiums, modular units and mobile homes. As might be expected, older subdivisions within the urban core include aging housing stock. Targeted reinvestment by the City in the Neighborhood Revitalization Strategy Area (NRSA), continues to provide resources for rehabilitation and down payment assistance to incentivize revitalization and reinvestment in older neighborhoods.

Due to the large geographic area within the municipal boundaries (621 square miles), infill opportunities are plentiful. In recent years, growth has been concentrated to the North and West of the downtown area, with young families seeking homes outside the limits of the Oklahoma City public school system in areas such as Edmond, Moore, Mustang, and Yukon. These growth patterns can be expected to continue during the next five (5) years of this Consolidated Plan.

To encourage reinvestment in older neighborhoods and to promote pedestrian oriented housing options, the City has strategically targeted three (3) neighborhoods in the central core as part of the Strong Neighborhoods Initiative Program. These include the Capitol Hill neighborhood, Classen's North Highland Parked, and the Metro Park areas. The City of Oklahoma City continues to place emphasis on home ownership activities while also ensuring that sufficient housing options exist for public housing, Section 8 voucher assistance, and rental opportunities for persons of all ethnicities and income levels.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	175,415	67%
1-unit, attached structure	8,645	3%
2-4 units	16,630	6%
5-19 units	33,705	13%
20 or more units	18,590	7%
Mobile Home, boat, RV, van, etc.	8,498	3%
Total	261,483	100%

Table 29 – Residential Properties by Unit Number

Data Source: 2011-2015 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	485	0%	3,840	4%

	Owners		Renters	
	Number	%	Number	%
1 bedroom	1,740	1%	26,275	27%
2 bedrooms	21,230	16%	37,535	39%
3 or more bedrooms	111,808	83%	29,354	30%
Total	135,263	100%	97,004	100%

Table 30 – Unit Size by Tenure

Data Source: 2011-2015 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Targeted households and projected beneficiaries are detailed in the Strategic Plan section of this report and in the first year Annual Action Plan. In summary, the City will assist in approximately nineteen (19) whole house rehabs annually. An estimated fifty-eight (58) households annually will receive exterior maintenance. Approximately 130 households annually will benefit from emergency home repairs. An estimated thirty (30) homebuyers will be provided down payment and closing costs assistance annually. An estimated seven (7) units annually will be constructed using CHDO funds, and three (3) homes will be constructed by non-profit organizations. These annual estimates are expected to remain consistent over the five (5) year term of this Consolidated Plan.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

It is not anticipated that affordable housing inventory will be reduced in the near future. Older units assisted under the Low Income Housing Tax Credit Program (LIHTC) in prior years may possibly revert to market rate units upon satisfaction of the imposed affordability requirements; however, it is unknown at the present time if and when this may occur, and any projections would be truly speculative.

The Oklahoma City Housing Authority (OCHA) administers 4,216 Section 8 Housing Choice Vouchers. It is unknown if they will have a loss of funding over the next five (5) years that will result in a loss of vouchers. The Section 8 waiting list has a waiting period estimated at over two (2) years. While the turnover rate for vouchers remains high, it has been steadily decreasing. Funds for routine maintenance of public housing units have become increasingly sparse, so the possibility of losing units to failed inspections is a concern. The City provides CDBG funds for the rehabilitation of approximately ten (10) public housing units per year to assist in unit retention.

OCHA administers a total of 2,966 public housing units. The tenant share of rent is based on household income and a subsidized tenant may choose to pay more of their own rent to occupy a more expensive unit.

Does the availability of housing units meet the needs of the population?

Since the 2010 Census, the 2018 American Community Survey (ACS) estimates the population has grown by 13%, or 74,595 people. According to the 2018 ACS, there are 33,097 vacant housing units within the Oklahoma City area. . The 2018 ACS Survey indicates that the homeowner vacancy rate is 1.4%, while the vacancy rate for rentals is 8.9%. A market for rental and for-sale housing exists at all income levels, and demand exists for additional housing units that are affordable for low and very low income households.

Demand for housing is constantly changing and is influenced by changes in personal finances, growth or changes in family size, and consumer confidence among other factors. Some households are seeking larger or newer residences, while others are downsizing from a home that has become too large or too expensive for the owner based on changing circumstances. When considering unit size, 57% of the local housing stock has three (3) or more bedrooms. As family sizes continue to decrease and the Millennial generation matures, it can be anticipated that demand for 2- bedroom single family homes with smaller square footage will increase over time.

Describe the need for specific types of housing:

At the present time, demand for all housing types appears to be satisfied by the private market. Community surveys and public comments do, however, indicate a preference for more affordable and workforce housing in the Central Business District which would enable those persons working downtown to adopt an urban and pedestrian lifestyle. Market rate housing units in the urban core have increased significantly since the previous Consolidated Plan was approved; however rental rates in the urban core are priced for the upper end of the market, and are not accessible to lower and median income households. The City continues to place emphasis on mixed-income development to create economic diversity and ensure equal housing opportunity in all areas of the city.

Discussion

Affordable housing and the rehabilitation of aging housing stock remain high priorities under this Plan. Needs and opportunities will be evaluated annually to ensure that resources are targeted strategically and that the stated goals of the Plan remain timely and relevant. Emphasis on mixed-income housing and deconcentration of poverty will remain a focus in all funding decisions.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

The 2011-2015 CHAS and ACS data below reflects a 17% increase in median home values since the completion of the 2010 Census. Of the owner-occupied households, only 30.9% of homes are affordable to families earning up to 80% AMI. 31.2% of units are affordable to households between 80-100% AMI.

Median contract rents in Table 30 below are \$609 per month which represents a 22.5% increase since the 2010 Census. Average rents are concentrated at the low end of the market with 32.3% of renters paying less than \$500 per month and 55.8% paying \$500-\$999. Only 1.4% of all renters pay more than \$2,000 in monthly rent. Of the rental households earning less than 30% of area median income, only 2.5% of the total available units are affordable to the tenant. This number increases to 11.3% for households between 30-50% AMI, and 26% for households between 80-100% AMI.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	118,300	138,600	17%
Median Contract Rent	497	609	23%

Table 31 – Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	31,356	32.3%
\$500-999	54,110	55.8%
\$1,000-1,499	8,384	8.6%
\$1,500-1,999	1,815	1.9%
\$2,000 or more	1,318	1.4%
Total	96,983	100.0%

Table 32 - Rent Paid

Data Source: 2011-2015 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	6,480	No Data
50% HAMFI	29,050	14,568
80% HAMFI	66,545	38,255
100% HAMFI	No Data	52,942
Total	102,075	105,765

Table 33 – Housing Affordability

Data Source: 2011-2015 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	612	669	851	1,163	1,437
High HOME Rent	612	669	851	1,163	1,319
Low HOME Rent	607	651	781	902	1,007

Table 34 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

There is a significant need for rental units affordable to households earning less than 30% of area median income. At present only 2.5% of available units are available to this demographic. The problem persists for households earning between 30-50% AMI as only 11.3% of rental units are affordable to this population. A rental unit is considered affordable if gross rent, including utilities, is no more than 30% of the annual household income.

On the homeownership side, 30.9% of all units are affordable to households earning less than 80% of the area median income. An owner unit is considered affordable if monthly housing costs, including principal and interest, taxes, hazard insurance, mortgage insurance and HOA dues are no more than 30% of the annual household income.

How is affordability of housing likely to change considering changes to home values and/or rents?

Based upon the 17% increase in median home values between the 2010 Census and the 2015 ACS, it can be anticipated that average home prices will increase approximately 3.4% annually. Although economic factors can contribute significantly to housing values, Oklahoma City has remained somewhat insulated from the recent recession and the local housing market has experienced very minor price movement in comparison to other parts of the country. While the rate of return may not be as significant in times of prosperity, losses are historically less likely in times of economic distress.

Similarly, based upon the data from the 2010 Census and 2015 ACS, median contract rents can be expected to increase approximately 4.6% annually. Median household income increased to \$53,973 in the 2018 ACS. This indicates that historically, annual household earnings have increased only 2.1% annually resulting in a growing disparity between median income levels and housing costs. It can be anticipated that demand for affordable housing options will continue to increase as the housing cost burden continues to escalate.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

The *median* gross rent in Oklahoma City was \$849 according to the 2018 ACS; however, the data does not indicate the number of bedrooms, or property type (e.g. Single Family, Multifamily). By comparison, the 2019 HUD Fair Market Rents for Oklahoma City were \$637 for an efficiency unit, \$689 for a one-bedroom unit, \$867 for a two-bedroom unit and \$1,184 for a three-bedroom unit (an average of \$844 per month). Using this methodology, FMR's are estimated to be comparable to the average gross market rents. Four-bedroom units are considered to be an outlier and are not included in this calculation. The difference between the average gross rents and FMR's indicate a continued need for affordable housing subsidies for low and very low income families.

The High HOME Rent is \$637 for an efficiency unit, \$689 for a one-bedroom unit, \$967 for a two-bedroom unit and \$1184 for a three-bedroom unit (an average of \$869 per month). Low HOME Rent is currently \$637 for an efficiency unit, \$689 for a one-bedroom unit, \$831 for a two-bedroom unit, and \$960 for a three-bedroom unit (an average of \$779 per month). It is important to note that the FMR and HOME rent standards are *inclusive* of monthly utilities, so comparison with the average market rents quoted above (which do not include utilities in most cases) can be misleading. In actuality, HOME-assisted units are capped at a monthly rent that is affordable to low income families when all costs are considered. By contrast, the market driven data is reflective of all households without regard to total monthly housing cost.

Market rents have remained steady over the last several years in the Oklahoma City area with average annual rent increases typically below the national average. However, the demand for additional affordable rental units has continued to increase as the cost of housing in relation to annual household income continues to rise disproportionately, particularly among the very lowest income families. High concentrations of poverty within the City have restricted the mobility of low income households, and the average rents are not reflective of higher end markets in thriving neighborhoods. Priority housing needs and annual objectives identified in this Plan continue to support mixed-income development and diversity of neighborhoods.

Discussion

In arriving at conclusions about the rental housing market, a presumption was made that households of one or two persons occupy the efficiency and one-bedroom units, small related households for three (3) or four (4) persons occupy the two-bedroom rental units, and that large related households of five (5) or more persons occupy the three-bedroom and larger units.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

The 2011-2015 ACS data below reflects that 22% of owner-occupied units and 47% of rental units suffer from at least one adverse condition. These include (1) Lacking complete plumbing facilities, (2) Lacking complete kitchen facilities, (3) more than one-person occupancy per room, and (4) cost burden exceeding 30%. It is also noted that 52% of owner-occupied units and 60% of rental units were constructed prior to 1979.

Definitions

Standard Condition- The 1978 BOCA Basic Property Maintenance Code , as amended, is the City's adopted minimum acceptable standards for the maintenance of existing buildings, structures, premises and facilities to protect the general health and welfare of the public. The code was adopted and incorporated fully to control property maintenance in existing buildings within the corporate limits of the City. Homes that do not meet this definition are considered substandard.

(Ordinance No. 15852, Section 1(8-19), 6-24-80; Ordinance no. 16823, Section 1, 8-10-82, Section 24-11)

Substandard Condition but Sustainable for Rehabilitation: Any home that does not meet the above definition of standard condition, may be determined to be financially feasible and structurally suitable for rehabilitation as long as the current condition of the home does not create a nuisance or post a threat to the health, safety and/or welfare of the surrounding neighborhood or residents. If City funds are needed to complete the rehabilitation, then the cost of the rehab must not exceed the housing rehabilitation program's funding limits.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	29,035	21%	42,960	44%
With two selected Conditions	904	1%	3,170	3%
With three selected Conditions	59	0%	50	0%
With four selected Conditions	0	0%	4	0%
No selected Conditions	105,250	78%	50,815	52%
Total	135,248	100%	96,999	99%

Table 28 - Condition of Units

Data Source: 2011-2015 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	30,635	23%	12,308	13%
1980-1999	35,020	26%	26,235	27%
1950-1979	52,198	39%	42,744	44%
Before 1950	17,420	13%	15,713	16%
Total	135,273	101%	97,000	100%

Table 29 – Year Unit Built

Data Source: 2011-2015 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	69,618	51%	58,457	60%
Housing Units build before 1980 with children present	19,274	14%	12,024	12%

Table 30 – Risk of Lead-Based Paint

Data Source: 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 38 - Vacant Units

Data Source: 2005-2009 CHAS

Need for Owner and Rental Rehabilitation

As noted previously, 51% of owner-occupied residences and 60% of rental units were constructed prior to 1979. This large supply of aging housing stock itself is an indicator that rehabilitation needs will continue to increase over the five (5) year Consolidated Plan period. Additionally, 21% of owner-occupied residences and 44% of rental units reported in the table above have at least one (1) substandard condition that requires immediate attention. The City does not maintain a database or inventory of substandard housing. The recently released 2018 ACS 1-year estimates shows 256,335 owner-occupied housing units of which 99.7% have complete plumbing facilities and 99.3% have complete Kitchen facilities. The 2018 ACS data reflects 106,123 renter-occupied units of which 99.2% have complete plumbing facilities and 98.9% have complete kitchen facilities. The 2011-2015 data

reflects a higher percentage of adverse conditions due to the inclusion of cost burden and overcrowding data which is not included in the 2018 ACS estimates.

The majority of City-funded rehabilitation programs support owner-occupied housing units because the City's affordable housing strategy encourages homeownership, and HOME funds allocated to the City are not sufficient to cover the demand for rehabilitation in the private rental market. However, the City does allocate CDBG and HOME funds for rehabilitation of rental housing owned by the Oklahoma City Housing Authority, the acquisition and rehab of transitional housing units owned by non-profit organizations, and for smaller 4-8-unit rental housing projects.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

The 2011-2015 ACS (total units) and the 2011-2015 CHAS (units with children present) data reflects that 69,618 owner occupied units were built prior to 1980, of which 14% have children present. On the rental side, 58,457 units were built prior to 1980, of which 12% have children present. Based upon the income demographics for total households in Section NA-05 (2011-2015 CHAS data), 46.1% of all households earn less than 80% of area median income. When applying the same percentages for determination of potential Lead Based Paint hazards, it can be expected that approximately 32,094 owner-occupied homes built prior to 1980 are occupied by low or very low income families. Likewise, it can be estimated that 26,949 rental units constructed prior to 1980 are occupied by low or very low income households.

Discussion

Within Oklahoma City, all of the homes built prior to 1950 that have been tested for lead based paint have tested positive. Since July 2001, the Housing Rehab Staff has tested and cleared every home that the City has rehabilitated to the standards for lead-safe housing regulated by the Department of Housing and Urban Development (HUD) and the State of Oklahoma's Department of Environmental Quality (DEQ).

The central city neighborhoods contain most of the housing constructed prior to 1978, and the City's Neighborhood Revitalization Strategy Area (NRSA) encompasses most of this area. The NRSA encompasses the majority of the City's low-income census tracts and is the area where the City directs approximately 80% of its federal grant funds. The City of Oklahoma City consults with the Oklahoma State Department of Health on Lead Based Paint and housing. In 1994, legislation was adopted by the State establishing the Oklahoma Childhood Lead Poisoning Prevention Program under the administration of the Oklahoma State Department of Health (OSDH) and created the Childhood Lead Poisoning Prevention Advisory Council. The Childhood Lead Poisoning Prevention Advisory Council submitted rules for the Program to the OSDH that were approved in 1995 and adopted by the Governor the same year.

The City is directly involved in alerting and educating households concerning lead hazards, particularly regarding housing units proposed for CDBG or HOME rehabilitation assistance, and indirectly through each of its sub recipients, Community Development Housing Organizations, and other for-profit and nonprofit organizations providing housing. For its part, all applicants seeking housing assistance from the City receive a pamphlet informing them of the dangers of lead hazards. If assistance is granted to an applicant, they sign for the information at loan closing.

All housing rehabilitation inspectors for the City of Oklahoma City are licensed and certified as lead-based paint risk assessors, inspectors and abatement supervisors. The lead paint inspection and assessment services of the City's licensed staff are used by most housing providers receiving federal funds from the City and other non-profit housing providers contract for the services. Some of the rehabilitation staff members are certified as Lead Abatement Supervisors and Risk Assessors for target housing and child-occupied facilities. The Rehabilitation staff inspectors are trained in NITON Spectrum Analyzer/Radiation Safety. The areas of highest need in Oklahoma City are tracked by zip code and will be included in the next Lead Exposure Risk Assessment Questionnaire. Staff recommends to families receiving federal funds for home rehabilitation that children aged 12 to 24 months receive a blood lead test.

The City's NRSA includes all or a portion of fourteen (14) zip codes. The areas of concern within the NRSA (by zip code) are: 73102, 73103, 73104, 73105, 73106, 73107, 73108, 73109, 73111, 73117, 73118, 73119, 73129, and 73159. All properties within the NRSA are considered to be at higher risk for lead poisoning than newer areas of the City. Due to the age of these older neighborhoods, most homes were constructed prior to 1978 and many are much older. Although not all homes in the NRSA will require abatement, the risk remains higher than in other areas of the City that were constructed much later.

The Oklahoma State Department of Health tracks individual cases of children with elevated blood lead levels.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

Public Housing: The Oklahoma City Housing Authority owns 2,999 public housing units in projects and scattered rental units. The units are divided among senior and general occupancy units. Section 8 Vouchers are provided to 4,216 families, of which 181 are project-based and 4,035 are tenant-based.

Senior Housing Units:

- 916 elderly housing units are located in eleven (11) housing development sites
- 8,325 applicants are on a waiting list for elderly units at the time of reporting.
- The occupancy rate on the units is 99%
- The average age of these structures is 42 years
- All residents are low income-the majority are very-low income

General Occupancy Housing Units:

- 1,670 housing units classified as family units are located at six (6) developments and on multiple scattered sites.
- 30,128 applicants are on a waiting list at the time of reporting.*
- The average age of the multifamily development structures is 54 years. The 451 scattered site units range in age from 31-82 years old.
- The occupancy rate is 97%.
- All residents are low income-the majority being very-low income.*Note: Families may sign up for multiple waiting lists, so this number includes duplicated requests.

Section 8 Housing:

OCHA administers 4,585 Section 8 Housing Choice Vouchers. There are 1,197 participating landlords. It is unknown if a loss of funding will be experienced over the next five (5) years resulting in a loss of vouchers. The Section 8 waiting list is 5,634 households at the time of reporting and there is an average waiting period of over two years. While the turnover rate for vouchers remains high, the rate has been steadily decreasing over the past 5 years. A person or family applying at the time of this report can anticipate a waiting period of at least three (3) years before receiving assistance. To summarize, OCHA administers a total of 7,182 housing units. The tenant share of rent is based on household income and a subsidized tenant may make a choice to pay more of their own money to have a more expensive rental unit.

Housing Authority Goal

OCHA has set a goal of assisting ten (10) families in achieving homeownership each year through the Housing Authority Family Self-Sufficiency (FSS) Program and the Housing Authority Homeownership Program. The Family Self-Sufficiency Program (FSS) is a five-year program where voluntary participants in the Housing Choice Voucher Program (Section 8) enter a program designed to reduce the participant’s dependency on public assistance. Families are assisted in meeting goals of a service plan created for each family. Since the Program has been in effect, more than 107 men and women have attained economic independence. When funding for OCHA’s Homeownership Coordinator was eliminated, the public housing homeownership program became inactive. As a result, no families have been recently enrolled. Another funding source must be identified if this program is to provide homeownership benefit during the five (5) year Consolidated Plan period.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	4	3,073	4,137	165	3,972	389	767	321
# of accessible units									

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 39 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments and describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

Describe the supply of public housing developments:

OCHA recently reassigned or modified building assignments (restructured AMPs). The new structure as of 1/1/2020 is as follows:

1. 348 units at Will Rogers Courts +(AMP no. 101)288 units at Oak Grove (AMP no. 102)200 units Ambassador Courts (AMP no. 103)448 Scattered Site Units (AMP no. 104)74 units at Fred Factory Gardens (AMP no. 105)159 duplex Units on MLK (AMP no. 106)342 units at Marie McGuire Plaza & Wyatt F. Jeltz Senior Center (AMP no. 111)238 units at The Towers Apartments

& Classen Senior Center (AMP no. 112)202 units at Danforth Senior Center & Candle Lake Senior Center (AMP no. 113)302 units at Shartel Towers & Hillcrest Senior Center (AMP no. 114)312 units at Andrews Square, Reding Senior Center, Reding Annex (AMP no. 115)

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The Housing Authority's Capital Funds are used for major repair and replacement of failed systems. OCHA has experienced an annual decrease in Capital repairs and improvements funding since 2010 that has severely limited the number of upgrades that are possible to complete. This trend is expected to continue in future years. Oklahoma City allocates CDBG funds to OCHA annually to rehabilitate approximately 10 low-rent public housing units each year. In total OCHA is able to rehabilitate 1,089 units on average per year.

Public Housing Condition

Public Housing Development	Average Inspection Score
Will Rogers Courts + 49 Scattered Site Units (AMP no. 101)	48
Oak Grove + 82 Scattered Site Units (AMP no. 102)	59
Ambassador Courts (AMP no. 103)	62
Sooner Haven +109 Scattered Site Units (AMP no. 104)	42
Fred Factory Gardens (AMP no. 105)	58
369 Scattered Site Units (AMP no. 106)	45
Marie McGuire Plaza & Wyatt F. Jeltz Senior Center (AMP no. 111)	83
The Towers Apartments & Classen Senior Center (AMP no. 112)	85
Danforth Senior Center & Candle Lake Senior Center (AMP no. 113)	92
Shartel Towers (AMP no. 114)	95
Andrews Square (AMP no. 115)	90
Reding Senior Center, Reding Annex & Hillcrest Sr. Center (AMP no. 116)	92

Table 40 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

The average public housing unit in Oklahoma City is 53 years old. Capital improvement funds received by the Oklahoma Housing Authority continue to decrease and are insufficient to address all necessary maintenance needs. OCHA, at the time of this report, has a backlog of modernization needs in excess of \$20 million due to the age of properties and insufficient maintenance reserves. Project maintenance needs are as follows:

Minor Renovation / Modernization

1. Jeltz
2. Hillcrest
3. Danforth
4. Candlelake
5. Reding
6. Ambassador Courts
7. Shartel Towers
8. Andrews

Major Renovation

1. McGuire
2. Fred Factory
3. Sooner Haven
4. Oak Grove
5. Classen

Redevelopment

1. NE Duplexes
2. Will Rogers
3. Towers

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

The Oklahoma City Housing Authority (OCHA) is a nonprofit organization operating in accordance with policies established by the Board of Commissioners and statutes administered by the U.S. Department of Housing and Urban Development (HUD). They are dedicated to one purpose, providing clean, safe and decent housing for low-income families and senior citizens of Oklahoma City. Special services are offered to residents that want to have and enjoy a better quality of life for themselves and their families. Some services assist working parents with low-cost childcare, and can aid in the growth and development of the family as a whole. OCHA's own armed security force with uniformed vehicle, bicycle and foot patrol officers make their rounds 24 hours a day, seven days a week. The many youth programs, neighborhood watch programs and the Drug and Crime hotline have proven to be very effective.

Providing affordable, clean and safe housing is just the beginning of the assistance offered. All apartment complexes have their own community/recreation center. These centers are available to all residents. Activities for children, teens and adults are conducted in these facilities as well as in other nearby locations. Also, modern playground equipment is available so children can enjoy a safe place to play outdoors.

The following projects for improvement of the public housing stock are planned and/or underway at the time of this report:

1. Sooner Haven – 150 units, RAD/Section 18 conversion currently undergoing major renovation.
2. NE Duplexes – 159 units (previously part of AMP 106) – Planned Section 18 demolition/disposition. New construction on existing 15 acres + 15 adjacent acres planned for Fall 2020.
3. The Towers – 138 units (part of AMP 112) – Planned Section 18 demolition/disposition. New construction planned for replacement of 138 units + additional units independent and assisted senior living located at NW 10th & Classen. Planned to begin Summer 2020.
4. In Partnership with the Community Enhancement Corporation (CEC) OCHA's strategies:

- A. Developer for Public Housing Redevelopment
 - I. In partnership with the Oklahoma City Housing Authority, assist with the implementation of the 2016-2026 Strategic Investment Plan, which includes the rehabilitation / redevelopment of 1,000 public housing units
- B. Senior Health Care Network
 - I. Leverage the construction of JHJ Care Suites into a system of affordable health care and housing for seniors, focusing on providing care to public housing and Section 8 residents.
- C. Specialized Affordable Housing Development
 - I. Identify affordable housing development opportunities that help serve and support the core mission behind the housing authority and extremely low income individuals, focusing on projects that combine supportive services, and which create economic mobility for residents.
- D. Homeownership
 - I. The CED will purchase/rehabilitate and/or construct homes in Oklahoma City and will sell those.

Discussion:

The City of Oklahoma City maintains a collaborative relationship with the Oklahoma City Housing Authority. Federal CDBG funds have historically been provided to support the rehabilitation of public housing units, although this support is minimal in relation to overall need. Due to decreased federal funding for capital repairs, the need for capital improvements in public housing projects continues to exceed available resources resulting in a maintenance backlog. The need for additional Section 8 vouchers remains a critical need in the community, with average wait times exceeding two (2) years. Affordable housing options for low to moderate income families remain limited, and efforts to produce and rehabilitate more affordable units are highly prioritized in this Consolidated Plan.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

The priorities and specific activities focus on maintaining the ability of special needs populations to continue independent residency. Services are available to assist persons with special needs that include the elderly and persons with disabilities. One key recurring issue for persons with special needs is access to transportation. The City continues to allocate CDBG to COTPA (Central Oklahoma Transportation and Parking Authority) to support the Share-a-Fare program, a program that provides discounted coupons for bus and taxi fare to eligible persons. The City is currently funding the expansion of beds available to the homeless with HOME and CDBG funds and will continue to support these types of activities as funds allow.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	249	20	113	160	0
Households with Only Adults	773	80	86	776	0
Chronically Homeless Households	0	0	0	308	0
Veterans	14	0	31	351	0
Unaccompanied Youth	24	10	11	0	0

Table 41 - Facilities and Housing Targeted to Homeless Households

Alternate Data Source Name:

The City of OKC CoC and ESG Service Providers

Data Source

Comments:

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

When an intake is completed with a client, an inventory is taken to identify sources of their cash income and other mainstream resources. Clients are assessed for mainstream service needs; not only at intake but also at interim intervals and when discharged from the program. If a person qualifies for mainstream benefits they have not yet applied for, their case manager will help them through that process. If a client has received MEDICAID or MEDICARE, they may use it to obtain health services from a general provider. However, the State of Oklahoma did not expand MEDICAID under the new health care law so there are many clients who cannot receive this assistance. The primary resource for people in that situation is reliance upon one of the few local healthcare providers who treat the low income and homeless.

Several homeless service providers within the Oklahoma City Continuum of Care (CoC) specialize in working with individuals with mental health concerns. Case managers within these organizations receive SSI/SSDI Outreach, Access and Recover (SOAR) training, and the ability to connect their clients to SSI/SSDI benefits. All Community Mental Health Centers in Oklahoma City collaborate with housing providers within the CoC to provide services to their clients. Two of these Centers are CoC housing providers themselves. Nearly every homeless service provider in Oklahoma City, as well as numerous government organizations, are members of the Coalition to End Poverty.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

The City continues to allocate federal grant funds to assist non-profit and for-profit housing developers to rehabilitate and construct new affordable housing, and by providing funding assistance to Community Housing Development Organizations.

In 2019, ESG funds were provided to ten (10) agencies to assist in the provision of emergency shelter, and transitional housing for mentally ill persons, victims of elder abuse, homeless youth, and victims of domestic violence. ESG funding is also used to continue the Coordinated Case Management (CCM) program. This project focuses resources on housing homeless families quickly and helping them remain in their current home if possible. To provide these needed activities, the City consults with several agencies that include the Oklahoma Department of Rehabilitative Services, COTPA, Oklahoma City Housing Authority, providers of transitional and permanent supportive housing, and the Homeless Alliance among others.

The City of Oklahoma City Continuum of Care (CoC) uses a “No Wrong Door” approach to homelessness. An individual or family can have an assessment performed by any CoC provider agency simply by walking in the door, or by calling 211. Based on that assessment, clients will be prioritized for housing based on

their vulnerabilities and directed to the organization that is most suited to their needs. Two CoC organizations provide prevention and rehousing assistance using Emergency Solutions Grant funds. These services predominantly serve non-chronically homeless families but occasionally serve chronically homeless as well.

Journey Home OKC is the City's local effort to house people experiencing homelessness in our community. Several CoC organizations as well as government agencies have joined in this effort, including the Veteran's Administration (VA), the Oklahoma City Housing Authority (OCHA) and the Oklahoma Housing Finance Agency (OHFA). Currently, OCHA and OHFA provide a housing preference for those who are coming through Journey Home for their Housing Choice Vouchers. OCHA extends this preference for their public housing units. This effort serves both chronically homeless individuals, families, veterans, unaccompanied youth, and those recently released from incarceration.

As the Veterans Administration is part of the Journey Home effort, veterans and their families are served by the program too with VASH and other veteran's housing resources used for housing support. Additionally, services can be provided to veteran's families by Goodwill through the Supportive Services for Veteran's Families program.

The Continuum of Care Board continues to seek more efficient methods of locating unaccompanied youth in Oklahoma City. The City has two homeless youth providers. SISU Youth operate an overnight shelter for unaccompanied youth, with an emphasis on LGBT youth. Pivot is in the construction phase of opening an overnight emergency shelter and drop-center for unaccompanied youth. It is anticipated that the Pivot project will be completed and opened in the First Action Plan year under this Consolidated Plan.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

The priorities and specific objectives focus on maintaining the ability of special needs populations to continue or achieve independent residency.

Services are available to assist persons with special needs including the homeless, low to moderate income seniors over age 62, persons with permanent disabilities, victims of domestic violence, abused children, and children aging out of the foster care system. One key recurring issue with persons with special needs continues to be access to transportation. The City continues to allocate CDBG and ESG funds to Central Oklahoma Transportation and Parking Authority (COTPA-Oklahoma City's Transit Authority) to implement the Share-a-Fare program, a program that provides discounted coupons for bus and taxi fare to eligible persons.

The City will continue to fund housing programs that help address problems for homeowners at less than 80% AMD with exterior maintenance grants and emergency repairs, and whole house forgivable rehabilitation loans to seniors or disabled residents at or below 60% of median income. The programs will assist these persons in maintaining their residency.

Federal grant funds from the City's CDBG, and HOME grants are used to fund the activities outlined. To provide these needed activities, the City consults with outside agencies that include the Oklahoma Department of Rehabilitative Services, Central Oklahoma Transportation and Parking Authority, Oklahoma City Housing Authority, Providers of transitional and permanent supportive housing, and the Homeless Alliance among others. HOPWA funds are used to provide a variety of services to those who test positive for HIV/AIDs and their families.

HOPWA Assistance Baseline Table

Type of HOPA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
TBRA	56
PH in facilities	0
STRMU	98
ST or TH facilities	27
PH placement	55

Table 42– HOPWA Assistance Baseline

Alternate Data Source Name:

The City of OKC CoC and ESG Service Providers

Data Source Comments:

estimates include activities funded with both HOPWA and HOPWA-CV funding.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

According to the 2019 Housing Inventory Count, the OKC CoC has approximately 1,000 permanent supportive housing units, all of which solely accommodate individuals with disabilities, or families with a disabled family member. This enables the providers to serve elderly homeless individuals, persons with mental, physical or developmental impairments, persons with addictions, and persons with HIV/AIDS and their families. The City works closely with our local Housing Authority to house CoC eligible clients in permanent housing and assist with housing choice vouchers. All clients are housed through our Coordinated Entry System to ensure that those most in need obtain priority access to housing and services. All clients are assigned trained case managers to address their disabilities, and ensure they are able to maintain their housing. If a person's assessment indicates they may need round the clock care, their case manager will instead work towards obtaining a unit at a residential care facility.

While nearly all permanent housing programs funded through the Continuum of Care use a housing first approach, two (2) maintain sobriety requirements. We have maintained these sobriety requirements as there are many clients who request them. There remains a shortage of professional treatment programs for clients who either can't or choose not to be placed in housing a program with sobriety requirements.

While homeless individuals with an HIV/AIDS diagnosis are eligible for the CoC program, they are typically housed through the HOPWA program, unless circumstances don't allow. The HOPWA program has the added benefit of serving not only people who are homeless, but those with low incomes as well. The Homeless Alliance currently serves as the CoC's HOPWA provider and they provide the full range of HOPWA eligible housing assistance. Each client is staffed with a case manager to connect them with other needed services.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Oklahoma has a state mandated discharge policy for individuals exiting mental and physical health institutions. Ideally, these individuals should be connected with supportive family members or with an agency that can provide them with housing. One of Oklahoma City's housing service providers now collaborates with local mental health institutions to ensure patients have safe housing plans at discharge. Staff at many of the local mental health institutions have been trained to administer the community wide housing assessment tool, enabling their patients to be added to the community wide list for supportive housing.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

Not applicable to entitlement grantees. Please see response to the following question.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

The priority needs and specific objectives focus on maintaining the ability of special needs populations to continue and/or achieve independent residency. One-year goals related to non-homeless special needs include ongoing support of the Share-a-Fare program to support transportation options for elderly and disabled populations, continued funding of STRMU and TBRA using HOPWA funds to preserve existing housing for persons with HIV/AIDS, and CDBG funding reserved for future public facilities improvements and/or public service activities to serve non-homeless persons with special needs.

Services are available to assist persons with special needs including seniors and persons with disabilities. One key recurring issue with persons with special needs continues to be access to transportation. The City continues to allocate CDBG and ESG funds to COTPA (Oklahoma City's Transit Authority) to implement the Share-a-Fare program, a program that provides discounted coupons for bus and taxi fare to eligible persons. The City will continue to make grant funds available to assist projects and applications that support special needs populations on a competitive basis.

The City will continue to fund programs that help address problems for LMI homeowners with exterior maintenance grants and emergency repairs, as well as whole house forgivable rehabilitation loans to seniors at or below 60% of median income. The programs will assist these persons in maintaining their residency. Federal grant funds from the City's CDBG and HOME allocations are used to fund the activities outlined. To provide these needed activities, the City consults with several agencies that include the Oklahoma Department of Rehabilitative Services, COTPA, Oklahoma City Housing Authority, Providers of transitional and permanent supportive housing providers, and Homeless Alliance among others. Federal grant funds from the City's CDBG entitlement and the HOME entitlement are used to fund the activities outlined

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

This section identifies trends and practices that have been identified as impediments to the creation, sustainability and accessibility of affordable housing for low to moderate income families. Strategies to address these concerns are presented in Section SP-55.

- An Analysis of Impediments (AI) was completed for the City in March 2020. 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. Primary findings include rising rents and tightening of the rental market has disproportionately hurt very low income single-person households and families, many of whom are racial and ethnic minorities, persons with disabilities, and elderly residents.
- Similarly, rising home prices has introduced predatory lending and home purchase activity.
- Weak state laws to protect tenants from evictions without just cause exacerbates their vulnerability and increases homelessness, an undesirable outcome which is costly for the public sector.
- Residents and landlords would benefit from increased education and training, including fair housing laws and requirements and “good tenant” classes.
- Growing concern about the effect of city-facilitated redevelopment efforts on displacement of low income and minority residents.
- Multifamily developments are not being built to comply with the accessibility requirements under the Fair Housing Act due to lack of inspection/testing and enforcement.

The AI includes a Section with recommendations on revisions to the City’s development code. The City is undergoing an extensive rewrite of the development code to occur over the next few years. The code will be reviewed for changes needed with respect to the recommendations in the AI. Note that several recommendations made in the AI are not within the purview and/or the sole purview of the City, but awareness of these issues could affect future policies or partnership efforts. Improvements to the transit system including bikeways, sidewalks, and Bus Rapid transit, as well as to parks are on-going efforts by the City.

The City's response to the noted impediments is more clearly defined in Section SP-55, and in AP-75 of the Annual Action Plan and will be reviewed annually to ensure compliance with Fair Housing requirements.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

The City of Oklahoma City participates in a regional Comprehensive Economic Development Strategy (CEDS) administered by the Association of Central Oklahoma Governments (ACOG). The CEDS identifies three (3) primary goals towards achievement of regional economic development objectives.

- Goal One: **Infrastructure**. Enhance the region’s transportation and telecommunication systems.
- Goal Two: **Resiliency**. Build a resilient economy through business development and attraction, diversification of the economic base, and adopting policies to address economic and weather-related disruptions.
- Goal Three: **Innovation**. Grow the region’s startup, entrepreneurship, and business innovation ecosystem by providing the support and tools needed for businesses to thrive.

While each of these goals was chosen for its ability to leverage distinct opportunities in central Oklahoma, they were also intentionally chosen for their ability to support one another.

Since the last report in 2012, the four-county region (including Oklahoma, Cleveland, Canadian, and Logan Counties) experienced a population increase of 10.8%. In 2017, the region's total population was approximately 1.25 million, an increase of 264,224 since the 2000 Census. The 2020 Census will be conducted during the First Action Year of this Consolidated Plan. It is anticipated that population growth will continue during the five (5) year Consolidated Plan period. A distribution of the population by age reveals that people living in the four-county region are, on average, younger than their statewide and national counterparts. In-migration of young professionals continues to increase, which represents a reversal of historic trends. In the last ten (10) years, the ACOG region has experienced a net gain of almost 49,500 jobs. The regional absorbed a net decrease in jobs only twice in the previous two decades, both during a national recession.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	9,450	17,410	5	6	1
Arts, Entertainment, Accommodations	31,119	39,216	15	13	-2
Construction	12,558	17,064	6	6	0
Education and Health Care Services	39,973	58,987	19	19	0
Finance, Insurance, and Real Estate	15,348	23,394	7	8	1
Information	4,106	6,606	2	2	0
Manufacturing	18,638	28,988	9	9	0

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Other Services	6,734	9,121	3	3	0
Professional, Scientific, Management Services	20,087	32,125	10	10	0
Public Administration	0	0	0	0	0
Retail Trade	30,285	38,590	15	13	-2
Transportation and Warehousing	8,247	14,198	4	5	1
Wholesale Trade	11,902	21,153	6	7	1
Total	208,447	306,852	--	--	--

Table 43 - Business Activity

Data 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)
Source:

Labor Force

Total Population in the Civilian Labor Force	309,254
Civilian Employed Population 16 years and over	290,695
Unemployment Rate	5.99
Unemployment Rate for Ages 16-24	19.49
Unemployment Rate for Ages 25-65	3.84

Table 44 - Labor Force

Data Source: 2011-2015 ACS

Occupations by Sector	Number of People
Management, business and financial	68,150
Farming, fisheries and forestry occupations	13,400
Service	30,514
Sales and office	72,845
Construction, extraction, maintenance and repair	31,449
Production, transportation and material moving	15,375

Table 45 – Occupations by Sector

Data Source: 2011-2015 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	217,470	78%
30-59 Minutes	53,800	19%
60 or More Minutes	7,650	3%
Total	278,920	100%

Table 46 - Travel Time

Data Source: 2011-2015 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	29,285	2,364	16,780
High school graduate (includes equivalency)	52,235	4,334	22,975
Some college or Associate's degree	74,065	4,095	21,685

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Bachelor's degree or higher	80,705	1,730	12,850

Table 47 - Educational Attainment by Employment Status

Data Source: 2011-2015 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	1,940	6,252	5,615	8,948	4,815
9th to 12th grade, no diploma	8,644	8,723	6,950	11,950	5,965
High school graduate, GED, or alternative	17,450	22,175	18,520	38,965	20,445
Some college, no degree	21,820	24,315	17,735	35,665	16,945
Associate's degree	2,414	7,374	6,659	9,020	3,045
Bachelor's degree	5,729	23,175	15,805	26,710	10,473
Graduate or professional degree	385	8,440	7,525	14,580	8,008

Table 48 - Educational Attainment by Age

Data Source: 2011-2015 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	138,238
High school graduate (includes equivalency)	173,785
Some college or Associate's degree	227,709
Bachelor's degree	326,121
Graduate or professional degree	418,533

Table 49 – Median Earnings in the Past 12 Months

Data Source: 2011-2015 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Based on the data populated in the above table, as well as in the 2018 ACS 1-year estimates, the Education and Health Care services sector provides the largest percentage of the total jobs in Oklahoma City (approximately 20%), followed by Arts, Entertainment and Accommodations at 12.8%. Retail trades are closely behind in third position at 12.6% of all jobs. It is important to note that no jobs are reported under Public Administration in Table 42 above. This is most certainly an error. The City of Oklahoma City has over 4,000 employees. Many federal jobs are also available at nearby Tinker Air Force Base and the FAA training center. As Oklahoma's largest city, the Oklahoma County seat, and home to the Oklahoma state capitol, government jobs in Oklahoma City are plentiful.

Describe the workforce and infrastructure needs of the business community:

Oklahoma City's unemployment rate has remained relatively low in recent years. The unemployment rate of 5.99% reflected in the above table from the 2011-2015 ACS, declined significantly to 2.8% in December 2019 according to the local area unemployment statistics released by the Bureau of Labor Statistics. It is anticipated that local unemployment may increase marginally in the five (5) years covered by this Consolidated Plan as the energy sector continues to experience extreme market fluctuations and layoffs at large local employers increase. The long-term impacts of COVID-19 adds additional uncertainty.

After years of the oil and gas industry dominating the local job market, the Oklahoma City metro area is in the midst of a major economic restructuring. This restructuring, however, remains tenuous as higher paying jobs are lacking and development patterns outside the main population centers remain uneven. The recently updated Comprehensive Economic Development Strategy (CEDS) identifies three (3) Key Findings that presently impact the local economy.

- **Uneven Development Patterns:** Growth and investment have not been evenly distributed across the region.
- **Vulnerability to Economic Disruption:** The region's historic dependence on oil and gas, and to climate-related vulnerabilities have been an impediment to economic growth.
- **Lagging Growth in Innovation:** While many exciting innovations are emerging, the region has lagged behind peer markets on innovation-related indicators.

Although these findings reflect weaknesses, they provide a framework for future priorities. Federal funds awarded under this Consolidated Plan seek to address these deficiencies and prioritize economic growth as resources allow.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

Oklahoma City is experiencing positive growth with multiple projects recently completed, underway and planned for the near future. Both residential and commercial development projects are slated for completion during the five (5) year consolidated plan period that will significantly affect the local economy in terms of jobs created, population growth, tourism, and business activity. Major development projects now underway include a new convention center and hotel funded with the MAPS3 initiative. Convention bookings are now being finalized and early indicators are that this facility will produce a significant increase in out of state visitors. A streetcar system completed in 2019 will enable visitors to easily access the Bricktown Entertainment and Midtown districts where revenue from tourism dollars is expected to increase.

The City is currently vetting a Section 108 application in support of the historic First National Center which is being converted to a hotel and condominiums with a large retail component. Environmental remediation has been completed and an adjoining parking garage is under construction. The project is expected to be completed during the Second Action Year Plan under this Consolidated Plan.

In addition to the City's ongoing formula grant activities, local efforts have been undertaken to address economic need. The citizens of Oklahoma City passed a fourth Metropolitan Area Projects (MAPS4) tax referendum that continues to build on local investments in public facilities initiated in the early 1990's. The first three MAPS programs were focused on construction and renovation of public facilities which included numerous public school buildings, sports arenas, libraries, river dams, a canal, and fairground improvements. Funds were also used for City parks, construction of a new streetcar system, senior health and wellness centers, trail construction, and sidewalks.

The fourth MAPS initiative (MAPS 4), was approved by voters in December 2019 and is now underway. Citizen Advisory Committees are being formed and prioritization of the sixteen (16) approved projects is being discussed. The MAPS 4 initiative will support renovations and upgrades to the Chesapeake Energy Arena, home of the Oklahoma City Thunder NBA team. The MAPS 4 funding will also support the construction of a new Fairgrounds Arena, a new animal shelter, a civil rights museum, and construction of a multi-purpose soccer stadium. In addition to the larger public facilities projects, the MAPS 4 funds will provide for additional trails and sidewalks, youth centers, park improvements, beautification projects, mental health and domestic violence services, transit improvements, and a diversion hub. The MAPS funding is allocated on a "pay as you go" basis, so timing of completion on these projects is not immediately known. It is expected that most, but perhaps not all will be completed during the five (5) year Consolidated Plan period.

The Association of Central Oklahoma Governments (ACOG) is leading a regional transit initiative that is expected to improve intermodal activity between major urban centers within the five-county region. Bus Rapid Transit and rail service is currently being considered for routes between Edmond, Norman, Oklahoma City, and Midwest City.

All of these activities in totality are expected to exceed \$1 billion in public and private investment.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

Undoubtedly, Oklahoma City's higher education assets are a major advantage in developing skills and talent for the local workforce. It is important to note however that many recent graduates continue to pursue occupational opportunities in other regions, particularly in the Tulsa and Dallas-Fort Worth metropolitan areas. National demographic trends, most notably the aging of baby boomers, suggest that demand for workers may soon exceed the supply. As a result, competition for labor is expected to increase among local companies, as well as other urban communities. The City of Oklahoma City continues to focus on the development, attraction and retention of labor, primarily through the

management of economic development, small business training, and job training activities which are funded with CDBG dollars.

There continues to be a shortage of skilled workers in occupations requiring technical skills. This is true for both blue- and white-collar industries.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

The City continues to fund the Community Action Agency (CAA) small business assistance program to support job training activities. Some service agencies supported with Emergency Solutions Grant and Continuum of Care funds provide some level of job training and employment services. The City of Oklahoma City continues to explore opportunities to improve employment opportunities and incentive new business start-ups. Subject to the availability of funds, CDBG dollars will be made available as opportunities present themselves.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

Yes. The CEDS is prepared by the Association of Central Oklahoma Governments (ACOG) in consultation with representatives of local governments and interested parties. The CEDS was last updated in October 2019.

The City of Oklahoma City collaborates with the Association of Central Oklahoma Governments (ACOG) to identify activities, development projects, and business creation opportunities that aligns with the regional goals of the CEDS. Specific CEDS initiatives can be reviewed at the following link:

<http://www.acogok.org/wp-content/uploads/2019/11/ACOG-CEDS-October-2019.pdf>

Activities funded with CDBG investment supported revolving loan funds for small business expansions and start-ups in past years; however, the RLF did not perform as expected. Therefore, no RLF funding has been allocated in the First Action Year Plan. This activity may be reconsidered in future program years if the barriers to successful implementation can be eliminated. The City continues to seek opportunities for land and parcel assemblage, and infrastructure improvements to promote the development of large business and industrial sites for future businesses. This is accomplished primarily through the allocation of CDBG funds to the Oklahoma City Urban Renewal Authority under the slum and blight objective.

Discussion

At the time of Plan submission, a slowdown in the oil and gas industry attributed to volatility in the Middle East was beginning to affect the local economy. Recent layoffs have been initiated by local oil and gas employers, and high office vacancies are becoming problematic. It is unknown whether prices will stabilize or if further workforce reductions will be required. Proposed legislation at the national level regarding the use of fracking is also worthy of continued monitoring as a prohibition on this practice could negatively impact the local energy sector. Thanks to a multitude of factors, including a strong higher education presence, a burgeoning regional medical center, growing global energy demand, and continued civic investments in the urban core, the region appears poised to continue positive economic growth over the term of this Consolidated Plan. At the present time, the oil and gas concerns have not impacted other areas of the local economy and new development continues at a rapid pace. Improved diversification in the local employment base has at least somewhat minimized the impact of the energy sector concerns. As the local economic picture becomes clearer, annual economic development goals will be re-evaluated to ensure that resources are targeted appropriately. In addition, business closures and layoffs associated with the COVID-19 pandemic will have far-reaching impacts on the early Action Plan Years of this Consolidated Plan. At the time of this report, unemployment remained high and many businesses continue to operate with reduced staff and limited services.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

The City defines "concentration" as those Census tracts that have percentages of housing problems that exceed the city-wide average. The 2018 American Community Survey (ACS) 1-year estimate identifies physical housing characteristics for occupied housing units. It is noted in the ACS that approximately 0.3% City wide lack complete plumbing facilities. The ACS also reflects that approximately 1% of occupied units City wide are without complete kitchen facilities.

The 2011-15 ACS Survey 5-year estimates provides information on units with one (1) of four (4) identified housing conditions. These conditions include a.) Lacking complete plumbing facilities, b.) Lacking complete kitchen facilities, c.) Housing with more than one occupant per room, and/or d.) Monthly owner costs or gross rent as a percentage of household income more than 30%.

The ACS indicates that of 135,248 **owner-occupied** housing units, 21% have one selected condition, 1% have two selected conditions, and none have three selected conditions. None were noted with four (4) or more selected conditions. The data reflects that renter households experience substandard conditions in greater proportion than homeowners with 44% reporting at least one selected condition, 3% with two selected conditions, none with three selected conditions and none reporting all four (4) selected conditions.

It is unknown, based upon the data available, where the deficient units are located or if a disparate concentration of substandard housing exists. Anecdotally, it has been noted that neighborhoods located in the northeast and southwest quadrants of the City appear to be in greater need of maintenance and repair than those in other areas of the City, as local real estate market data would suggest. The goals and priorities of this Consolidated Plan have prioritized rehabilitation of older housing stock within the NRSA, which includes the urban core.

It should be noted that an affordable housing and market study by Root Policy Research is underway in conjunction with the City's new Analysis of Impediments. This study is expected to be completed in Summer 2020 and will be used to inform future program years.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

The recent AI documents indicates Oklahoma City has 19 Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs) as of 2019. These are neighborhoods that have a poverty rate of 40 percent and higher and are more than 50 percent Non-White and Hispanic residents. All of the R/ECAPs located within Oklahoma City's boundaries are mapped in the AI document. They are largely in the northeast and in the southern half of the City.

What are the characteristics of the market in these areas/neighborhoods?

Homes in Census tracts with large concentrations of minorities, low income households, and households with housing problems are generally concentrated in the northeast and southwest quadrants of the City. Property values and market rents tend to be lower for similar sized homes than in other areas of the City. Lack of sidewalks, aging infrastructure and deferred maintenance are common in lower income areas. These areas also tend to have greater numbers of vacant lots and buildings.

Are there any community assets in these areas/neighborhoods?

The City has approved a relatively new TIF district along the Northeast 23rd Street corridor between I-235 and Sooner Road, with a new grocery store slated for development. A redevelopment of the historic Page Woodson School in NE Oklahoma City to a mixed-use development has preserved a community landmark and serves as a catalyst for future neighborhood revitalization. Phase II of this development is nearing completion. In the southwest quadrant, a new urbanist mixed-use/mixed-income development is under construction near Wheeler Park which will include for-sale market rate housing, a restaurant and brewpub. This large-scale undertaking is expected to serve as an economic development tool and catalyst for revitalization in Hispanic neighborhoods south of the river, including the Capitol Hill SNI neighborhood.

The three (3) SNI neighborhoods are located in predominately minority areas. The City's SNI efforts have included partnerships with local schools to provide after school programming, neighborhood led infrastructure projects, tree planting and beautification projects, and corporate sponsorships to address needs in these communities. Although not all these assets can be measured monetarily, there has been a significant contribution of human resources and investment of volunteer labor to support initiatives in these targeted communities.

Are there other strategic opportunities in any of these areas?

As MAPS 3 activities are completed, and MAPS 4 projects begin construction, it is anticipated that City transportation services will be improved to provide additional routes and extended transit hours. Additional bus and streetcar routes will be added where feasible. A MAPS 3 senior center is expected to be completed near NE 36th and Lincoln Boulevard. MAPS 4 funding includes support for the Freedom Center, a civil rights museum to honor local African American history in our community. Infill opportunities still abound in all areas of the City, and it is anticipated that new development proposals will be received for projects in underserved areas of the City. As Bricktown and development in the Health Sciences area expands, the City will continue to incentivize and subsidize proposals that provide benefit to impoverished neighborhoods. Planned growth in the Innovation District and proposals for a new grocery store in Northeast Oklahoma City are expected to trigger additional development opportunities. The potential for investment in Opportunity Zones is also being monitored and explored.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

The Federal Communications Commission (FCC) established the Lifeline program in 1984 to provide qualified individuals with discounts on phone service. In 1997, the FCC broadened the scope of the program under the Universal Service Order to offer the Lifeline Program to assist low-income customers by helping to pay for monthly telephone charges so that connection to job, family and emergency services is more affordable. Due to the rise of cell phones, the FCC made more changes in 2005 so wireless phone service providers could offer free cell phone service using Lifeline benefits.

On March 31, 2016, FCC modernized and reformed its Lifeline program to help low income consumers afford access to the 21st Century's vital communications network- the internet.

FCC ensures that Lifeline subscribers receive services meeting 21st Century needs by

- Setting minimum standards for broadband to enable consumers to fully participate in digital society:
- Fixed speed standard based on what a substantial majority of consumers receive (currently 10 Mbps downloads/1 Mbps uploads).
- Sets minimum monthly fixed broadband usage allowance standard, starting at 150 GB.

After analyzing the availability of broadband access to low- and moderate-income families in Oklahoma City and surrounding areas:

- There are seventy-four (74) providers throughout the Oklahoma City and surrounding areas.
- Statistics show there is a common download speed of 100-1000 megabits per second (Mbps).

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

The two largest competitors for broadband services in Oklahoma City, Cox and AT&T, both provide services for low-moderate income households, but they do not meet the common download speed for broadband services:

- There are seventy-four (74) providers throughout the Oklahoma City and surrounding areas.
- Statistics show there is a common download speed of 100-1000 megabits per second (Mbps),

In 2012, Cox partnered with Connect2Compete to enable eligible low-income households to receive discounted Cox high speed cable Internet for only \$9.95 a month. This includes: 10 Mbps Internet Download Speed, Free Installation, and Waived Modem Rental Fees. The requirements are: To qualify, at least one student in grades K-12 must live in the household, and the household must be participating in one of these government assistance programs: free or reduced lunch through the National School Lunch Program (NSLP), Temporary Assistance for Needy Families (TANF), the Supplemental Nutrition Assistance Program (SNAP), or Public Housing (ConnectHome Program). Also, the household must not have been a Cox High Speed Internet service subscriber in the last 90 days or have outstanding Cox bills or unreturned equipment. In July 2015, AT&T and DirecTV merged, and the FCC imposed conditions for the following four years. AT&T was to provide an affordable low-income Internet access program. AT&T Access Internet is now available where AT&T wired home internet is offered. Depending on the internet speeds available in the resident's location, monthly cost is either \$10 for 10 Mbps or 5 Mbps plans and \$5 for 3Mbps Internet connection. The user does not choose the option; AT&T installs whichever is fastest in the area in which the resident lives. The installation and rental equipment are free. To participate, a person must be in the SNAP program- meaning single adults and families without school age children may also qualify for the low-income Internet service discount. The family must have no outstanding debt for AT&T fixed Internet service within the last six months or outstanding debt incurred under this program."

So, what can a household do with ten (10) Mbps? Five users on their computers may access or reply to emails, browse the web for information and upload or download small files. Five (5) Mbps is the minimum download speed for viewing HD Netflix on a laptop. Upload speeds are typically between 5% and 25% of the download speeds for home connections. Most home users can watch movies, surf web pages or download new software. Although these activities have some upload component, the vast majority of the data is downloaded, therefore home connections are optimized. Three Mbps is slow internet service, but preferable to having no internet access at all.

Low-moderate income families may use programs offered by these companies if they comply with the guidelines and are within the company's service areas. Review of the FCC's broadband services providers map suggests that all areas within Oklahoma City are covered by one or more broadband service carriers. The Oklahoma Broadband Mapping Project was a 2010 initiative to provide data related to broadband availability and internet speed statewide. Maps are accessible, but it is unclear whether they are current. Although, areas of slow to no reception are visible, most of the metro area appears well covered in the posted maps.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

The City of Oklahoma City has made use of a variety of data, analyses, and reports to determine, document, and project the expected impacts of climate change on services, infrastructure, and its residents. The City Planning Department has been working on **Adaptokc** as a subsidiary of our Comprehensive Planning process, **planOKC**. **Adaptokc** has not yet been finalized and adopted by the City but focuses on three sustainability principles: 1) positioning OKC to lead by example as a steward of public resources, 2) adapting OKC's infrastructure, services, and communities to OKC's changing climate, and 3) identifying how to use technological innovations to OKC's advantage. Reference documents describing observed climate changes and the impact thereof follow.

The September 2015 *Climate in the Heartland* report prepared by the Urban Sustainability Directors Network (USDN) examined five major cities in the Midwest- one of which was Oklahoma City (OKC). Historical climate variability studies from the past three decades were looked at by climatologists and compared to recent weather changes. OKC's historical context showed the annual average high and low temperature of 72.2°F and 50.8°F., and the average precipitation was 36.5" of annual rainfall and 7.8" of annual snowfall. However, recent observed seasonal weather changes include:

- Summers have increased variability in seasonal precipitation totals;
- More frequent warm nights in the last decade;
- Falls are dryer with an average date of first frost being three (3) days later;
- Winters are warmer and wetter; and
- OKC is having fewer cool springs and the average date of last frost is four (4) days earlier.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

Lifting the High Energy Burdens in America's Largest Cities is a 2016 report by the American Council for an Energy-Efficient Economy (ACEEE) created to understand income inequality caused by high home energy burdens while offering suggestions to make utilities more affordable to low-income communities. According to ACEEE the State of Oklahoma's average utility responsibility (also described as "energy burden", defined as the percentage of annual household income which goes to utility bills) is below 3 percent. However, Oklahoma City's average is approximately 3.5 percent for low-moderate income families. This was calculated using the Energy Consumption Survey from the Energy Information Administration (EIA) and US Census Bureau data between 2011 and 2013 to determine the average household income and amount spent annually on energy bills. [Note that overall Oklahoma City enjoys lower energy costs than most other areas of the country. For comparison, the cost in cities with the highest utility bills range from 4.3% to 6.2% of household incomes.]

The ACCEEE report correlated energy burdens to the race of householders. On average, African American and White households paid similar utility bills, however, because African American household incomes were lower, their 'energy burden' (defined as utility costs as a percentage of household income) was 64% higher than White households. Latino households paid lower utility bills on average than African American and White households, yet they experienced a 24% higher energy burden than White households.

In 2013, a sample size of 3,304 households in Oklahoma City was used to compare median gross household income and energy cost burden for various demographics. Results are as follows: 1,310 low income households with average annual income of \$24,998 have a utility burden of 7.36%. 214 low income multifamily households (includes those living in duplexes or apartments) with an average income of \$21,996 have a utility burden of 5.21 %. 354 African American households with average income of \$34,949 have a utility burden of 4.98%. 319 Latino households with an average income of \$39,994 have a utility burden of 4.26%, and 1,034 rental households with an annual income of \$34,972 have a utility burden of 4.27%. Furthermore, the percentage of households with energy burdens over twice the City average for all households combined was 22.19%; for low-income households- 52.90%; for multifamily households- 36.92%; for African American households- 33.62%; for Latino households - 26.96%; and for renting households- 29.21%.

The report concludes that low-income, low-income multifamily, African American, Latino, and renters devote a disproportionate share of their income to energy expenses. Low-income households typically live in less energy efficient housing and are often more difficult to reach with information about energy efficiency programs.

The City of Oklahoma City Hazardous Mitigation Plan can be viewed in Appendix 9B.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Consolidated Plan describes how the City of Oklahoma City plans to provide new or improved availability, affordability, and sustainability of decent housing; a suitable living environment; and economic opportunity, principally for extremely low and moderate-income residents. Priority needs established in this Plan were developed through review and analysis of CHAS, Census, and ACS data. Input was also received from consultations with service providers, citizen participation meetings, and analysis of the Housing Needs Assessment and Housing Market Analysis data presented earlier in this report. The priorities that address housing, services for the homeless, non-homeless special needs populations, and community development needs are prioritized based upon documented need and funding expectations during the five (5) year Consolidated Plan period.

In general, needs identified in the Consolidated Plan primarily focus on the development and rehabilitation of housing for low-moderate income families, services for the homeless, creation of economic opportunities, and improvement of quality of life through public facilities improvements and public service activities. Goals include the creation and retention of affordable rental housing units for special needs populations, persons transitioning from homelessness, and seniors and families. Homeownership remains a priority goal and funding for development, rehabilitation, and homebuyer down payment assistance is supported.

Plan priorities that relate to the homeless and persons with special needs, including persons with HIV/AIDS, are focused on program activities designed to provide housing and supportive services to underserved populations. Lastly, the community and economic development goals address needed public facilities improvements and public services. Resources are primarily targeted in low-income neighborhoods to remedy problems with blight and neighborhood decay, and to encourage neighborhood revitalization and business development.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Table 50 - Geographic Priority Areas

1	Area Name:	NEIGHBORHOOD STRATEGY AREA
	Area Type:	Strategy area
	Other Target Area Description:	
	HUD Approval Date:	6/21/2006
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	<p>The City of Oklahoma City applied for and received a 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 (outlined in orange on the attached map). 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.</p> <p>Based on census survey data (2018 ACS 5-year estimates 2014-2018), the NRSA has a poverty rate of 29.2% compared with the City overall poverty rate of 16.3%.</p> <p>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.</p>

<p>Include specific housing and commercial characteristics of this target area.</p>	<p>The most current census survey data (2018 ACS 5-year estimates 2014-2018) indicates the NRSA housing vacancy rate is 18.7% compared to the City's overall housing vacancy rate of 12%. In addition, there is a much greater proportion of renter-occupied housing (61%) in the NRSA versus rentals citywide (at 41%). Aging housing stock and deferred maintenance, along with large numbers of vacant and abandoned properties, create significant problems for NRSA residents. Crime rates in many NRSA neighborhoods are much higher than in other areas of the community. Commercial opportunities do exist but require development partners who are willing to assume short term risk in exchange for long term benefit. Most neighborhoods within the NRSA experience high concentrations of poverty which exacerbates social problems associated with limited opportunity.</p>
<p>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</p>	<p>The NRSA comprises approximately 29.5 square miles of the central portion of Oklahoma City. Since designation as an NRSA, the City has continued to expend most federal funds in this strategically targeted area to benefit the highest concentrations of low income residents. The NRSA received its designation based in part on the general indicators of need documented in this narrative; its geographic location encompassing much of the central city; and its concentration of lower income residents. As a result, the City 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.</p>
<p>Identify the needs in this target area.</p>	<p>Many of the low and moderate income areas contained in the traditional neighborhood developments within the NRSA suffer from high poverty rates, high vacancy rates, deferred property maintenance, and lower rates of home ownership.</p>

	<p>What are the opportunities for improvement in this target area?</p>	<p>Most of the NRSA consists of traditional neighborhoods encompassing residential and commercial areas that are thirty (30) years of age or older. Opportunities exist for the creation and development of mixed income neighborhoods to encourage the deconcentration of poverty. Opportunities also exist for funding down payment assistance programs to encourage homeownership in neighborhoods that are predominately occupied by renters.</p>
	<p>Are there barriers to improvement in this target area?</p>	<p>Local and federal resources are insufficient to address all needs, even those of the highest priority. Many developers are hesitant to comply with the City's desired goal of mixed-income housing and have indicated that, without substantial subsidy, all units must be market rate to generate positive cash flow.</p>
2	<p>Area Name:</p>	<p>Strong Neighborhoods Initiative</p>
	<p>Area Type:</p>	<p>Local Target area</p>
	<p>Other Target Area Description:</p>	
	<p>HUD Approval Date:</p>	
	<p>% of Low/ Mod:</p>	
	<p>Revital Type:</p>	<p>Comprehensive</p>
	<p>Other Revital Description:</p>	

<p>Identify the neighborhood boundaries for this target area.</p>	<p>Area 1: The Capitol View target area is generally bounded, starting on the North and moving counterclockwise, by Northeast 36th Street, North Lincoln Boulevard, Northeast 23rd Street, and North Kelley Avenue. The neighborhood organization in this area is the Capitol View Neighborhood Association.</p> <p>Area 2: The Capitol Hill target area is generally bounded, starting on the North and moving counterclockwise, by Southwest 21st Street, South Robinson Avenue, Southwest 36th Street, and South Walker Avenue. The organizations in this area are the College Hill Neighborhood Association and the Historic Capitol Hill Main Street, a business improvement district.</p> <p>Area 3: The Metro Park target area is generally bounded, starting on the North and moving counterclockwise, by NW 10th Street, N. Western Avenue, NW 5th Street, and Pennsylvania Avenue.</p>
<p>Include specific housing and commercial characteristics of this target area.</p>	<p>All three (3) targeted neighborhoods primarily consist of older single-family residential homes of various ages and architectural styles. Homes have been constructed over several decades and are representative of the era in which they were built. Commercial opportunities immediately surrounding the SNI neighborhoods are significant and infill opportunities for commercial and mixed-use development are plentiful. All neighborhoods in the target areas have experienced disinvestment in recent years and are identified for revitalization due to their strategic locations, active neighborhood associations, proximity to jobs and services, and potential for growth with significant local support.</p>

<p>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</p>	<p>The process to select two of the three SNI neighborhoods, Capitol View and Capitol Hill, began in June of 2017, with final selection approved by City Council in December 2017. The final selection was approved by the City Council in December 2017. The City’s Planning Department used neighborhood conditions data, community leadership evaluation, housing conditions surveys and other analysis to identify a small number of areas to consider for targeted revitalization. Priority was given to areas experiencing decline, but adjacent to stable neighborhoods and/or commercial districts and close to employment centers and transit. A citizen review group was assembled to review neighborhood applications and criteria to make final recommendations to City Council. The same process was utilized to choose the third area, Metro Park, which was approved by City Council in April 2020.</p>
<p>Identify the needs in this target area.</p>	<p>The primary needs in the SNI neighborhoods are infill development, demolition and/or remediation of vacant and abandoned buildings, housing options for all income ranges, rehabilitation of older housing stock, improved accessibility and infrastructure, park improvements, educational opportunities for youth, tree planting, food security, hazardous tree removals, and small business assistance. All these activities are recommended for funding in this Consolidated Plan.</p>
<p>What are the opportunities for improvement in this target area?</p>	<p>Opportunities for improvement in the SNI neighborhoods are plentiful. Elimination of blight, housing rehabilitation, property maintenance, resolution of issues related to prevention of poverty, absentee owners, partnerships with local schools and non-profit housing agencies, improved parks, and improved infrastructure have all been identified as strategic goals of the program. New housing construction and mixed-use development opportunities are prioritized.</p>

<p>Are there barriers to improvement in this target area?</p>	<p>Ownership issues related to title can be a barrier to real estate transactions and prevent access to resources for home improvements. Some issues have arisen in which property owners are unwilling to repair a property and bring it up to code but are also unwilling to sell it. Competing development goals between the public and private sectors have also proven to be problematic, specifically in terms of desired design standards.</p>
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General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The City of Oklahoma City targets spending of approximately 80% of its CDBG and HOME funds to activities within the NRSA, and whenever possible within the three (3) targeted Strong Neighborhoods Initiative (SNI) designated neighborhoods. Funding is highly concentrated within the NRSA to promote strategic targeting of scarce resources and provide a comprehensive approach to revitalization. For this Consolidated Plan period, priorities for funding may also be directed to eligible Opportunity Zone areas.

The Oklahoma City Continuum of Care accepts applications for ESG projects annually and determines allocations based upon current service needs and the ability of the applicant organizations to provide those services. Needs are determined by results of the annual Point In Time homeless census, data from the CoC’s Homeless Management Information System (HMIS) database, data from 211, and needs expressed by service providers to address deficiencies in the current delivery system. Providers also submit applications to the CoC for the HOPWA program; however, rather than allocating parts of the overall total to several different organizations, the full amount of the grant is allocated to one service provider. The provider is determined based on experience with the services they are to provide, quality of the services they have provided in past years, and ability to provide these services throughout the entire EMSA.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 51 – Priority Needs Summary

1	Priority Need Name	Creation and Retention of Affordable Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Families with Children Elderly Chronic Homelessness Individuals veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	
	Associated Goals	Affordable Housing Construction and Development Affordable Housing Retention and Rehabilitation Homebuyer Financial Assistance Support for the Homeless
	Description	Increase supply and retention of affordable housing for low moderate income persons through new development, rehab, and financial assistance to homebuyers. Provide HOME and CDBG funding to extremely low and low-income households for whole house rehabilitations, exterior maintenance code issues, and emergency repairs to address imminent threats to life, health or safety. CDBG funds are also used to assist in the rehabilitation of public housing units.
	Basis for Relative Priority	The City continues to place a high priority on homeownership and sustainability, with special emphasis on neighborhoods targeted for revitalization. The City promotes homeownership opportunities and encourages mixed-income housing in all communities. The provision of affordable housing for extremely low, low, and low-moderate income families is an ongoing need and is a high priority.
2	Priority Need Name	Elimination of Slum and Blight

	Priority Level	Low
	Population	Non-housing Community Development
	Geographic Areas Affected	NEIGHBORHOOD STRATEGY AREA
	Associated Goals	Elimination of Slum and Blight
	Description	The City remains committed to eliminating slum and blight in all areas of the City, with emphasis placed on our urban renewal areas and low-moderate Census Tracts. Funded activities may include acquisition, clearance, remediation, infrastructure development, and/or environmental cleanup.
	Basis for Relative Priority	Cleanup of properties in urban renewal areas is on-going. Activities may include acquisition and cleanup of property for future development, demolition, environmental remediation and/or other activities required to return these properties to useful life. These activities are lower priority than housing and homelessness activities for which needs are greater and immediate threats to life, health and safety are extant.
3	Priority Need Name	Public Services
	Priority Level	Low
	Population	Extremely Low Low Moderate Families with Children Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	
	Associated Goals	General Public Services-CDBG Support for the Homeless

	Description	CDBG funding is used to support eligible public service activities, including but not limited to youth services and summer programs, afterschool programming, health services, hazardous tree removal, legal assistance, discounted bus and taxi fares for special populations, and other eligible public services activities under CDBG Matrix Code 5.
	Basis for Relative Priority	The City of Oklahoma City remains committed to supporting public services for low- and moderate-income persons and neighborhoods as resources allow. These activities are lower priority than housing and homelessness activities in which needs are greater and immediate threats to life, health and safety are extant.
4	Priority Need Name	Public Facilities and Infrastructure
	Priority Level	Low
	Population	Non-housing Community Development
	Geographic Areas Affected	
	Associated Goals	Public Facilities and Infrastructure
	Description	Provide CDBG funding to assist neighborhoods by financing needed public facilities and/or infrastructure improvements in low- and moderate-income areas.
	Basis for Relative Priority	The City of Oklahoma City remains committed to supporting public facilities and infrastructure projects for low- and moderate-income neighborhoods and non-profit service providers as resources allow. These activities are lower priority than housing and homelessness activities in which needs are much greater and immediate threats to life, health and safety are extant.
5	Priority Need Name	Economic Opportunity
	Priority Level	Low
	Population	Extremely Low Low Moderate Non-housing Community Development
	Geographic Areas Affected	

	Associated Goals	Economic Development
	Description	Provide CDBG Technical Assistance (TA) and funding for small businesses and microenterprises, provide CDBG funding for title transfer and disposition of Urban Renewal properties, and apply for Section 108 funds as opportunities arise. Activities will be targeted to low-moderate income business owners in low-mod Census Tracts when practicable.
	Basis for Relative Priority	Economic development needs have increased substantially due to the COVID-19 pandemic and related impacts. Business support is anticipated to be an increased priority over the term of this Consolidated Plan. These activities are lower priority than housing and homelessness activities in which needs are much greater and immediate threats to life, health and safety are extant.
6	Priority Need Name	Prevention and Elimination of Homelessness
	Priority Level	High
	Population	Extremely Low Low Moderate Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Persons with Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	

	Associated Goals	Support for the Homeless
	Description	Provide financial assistance to prevent and minimize homelessness. Activities may include, but are not limited to financial assistance payments, overnight shelter, rapid re-housing, short term mortgage-rent-utility assistance, transitional housing, supportive services and case-management, prevention activities, domestic violence prevention/case management, mental health services, job training and employment services and the development of youth centers. Funding will be primarily thru ESG and HOPWA, with HOME and CDBG available for eligible activities.
	Basis for Relative Priority	The City of Oklahoma City strives for annual improvement in the number of persons maintaining permanent housing for more than six (6) months. The elimination and prevention of homelessness is one of the City's highest priorities, and substantial time and resources have been allocated for these activities.
7	Priority Need Name	Administration and Fair Housing Activities
	Priority Level	Low
	Population	Non-housing Community Development
	Geographic Areas Affected	
	Associated Goals	Support for the Homeless Administration Planning and Fair Housing
	Description	Funding to support administration, and management of federal formula grant programs, including CDBG, HOME, ESG, and HOPWA. Administration funds are used for staff support and program operations to ensure that funds are allocated, tracked, disbursed, and monitored in compliance with federal regulations. CDBG administrative funds are also used to support Fair Housing Activities.
	Basis for Relative Priority	Funding for administration is necessary to facilitate ongoing management and administration of formula grant programs. Administrative funds are used for staff support and program operations to ensure that CDBG, HOME, ESG, and HOPWA funds are allocated, tracked, disbursed, and monitored in compliance with federal regulations. These activities are lower priority than housing and homelessness activities in which needs are much greater and immediate threats to life, health and safety are extant.

Narrative (Optional)

The City of Oklahoma City has adopted strategies related to the provision of safe, decent affordable housing for all residents of the community with a focus on low and moderate income families. The City also strives to reduce homelessness by moving individuals and families from homelessness to permanent housing utilizing local and federal resources. Available funding includes the Continuum of Care (CoC) and Emergency Solutions Grant (ESG) allocations. CoC and ESG funding increases housing opportunities and provides associated case management support to help program recipients maintain permanent housing. Lastly, the City strives to reduce the risk of homelessness for persons living with HIV/AIDS in the Oklahoma City area using federal funds available under the Housing Opportunities for Persons With Aids (HOPWA) program.

The City strives to provide a safe and suitable living environment with adequate public facilities and services to ensure a high quality of life in all areas of the community, with focus on low and moderate income areas. In addition, the City of Oklahoma City seeks to expand economic opportunities by providing financial resources and technical assistance to assist businesses in creating jobs and providing retail and commercial services with focus in the Neighborhood Revitalization Strategy Area (NRSA). Special needs populations are assisted with expanded transportation options to improve accessibility of needed services, and to improve quality of life.

The provision of affordable housing is also a high priority. Priority is assigned to housing needs based on the amount of federal funds available, unmet needs identified in the preceding Housing Needs Assessment, focus on homeownership, and leveraging of non-federal funds through private investment. Housing goals have been assigned a higher priority than non-housing community development activities based on immediate threats to the life, health and safety of low and moderate income families.

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	<p>Tenant Based Rental Assistance is being considered for HOME or CDBG funding during the term of the 2020-2024 Consolidated Plan due to level of need the community has expressed. However, no funding has been established for this activity in the First Year Plan as no program design has yet been established. Currently CDBG-CV COVID-19 funds are being used to support qualifying residents impacted by the pandemic with housing and utility payments. Some TBRA assistance is provided to persons with special needs using HOPWA funding. A decrease in Section 8 funding to the Oklahoma City Housing Authority would immediately create a significant increase in demand for TBRA support.</p>
TBRA for Non-Homeless Special Needs	<p>Tenant Based Rental Assistance is available from HOPWA funds on a limited basis for persons with special needs. Funding is limited for this activity.</p>
New Unit Production	<p>Only 65.8% of rental units are affordable to households at 80% of Area Median Income (AMI). This decreases to 28% for families at 50% AMI, and only 6.3% for households at or below 30% AMI. Median home values have increased by 66% since the 2010 Census and median contract rents have increased by 39% over that same time frame. Affordable housing units cannot be developed fast enough to meet demand. New unit production is the highest identified priority.</p>
Rehabilitation	<p>The City's housing rehabilitation programs can address substandard conditions with interest free loans up to \$42,500 with \$15,000 available as a grant to remedy lead based paint deficiencies. Loan terms are based upon a borrower's ability to repay, with a minimum monthly payment of \$100.</p> <p>Programs to assist homeowners include CDBG Emergency Home Repair, CDBG Exterior Maintenance, HOME housing rehabilitation, Lead-Based Paint abatement, and whole house rehabilitation projects.</p> <p>Seniors aged 62 or over, or homeowners of any age that are disabled, are eligible for a "SAFE" loan that is forgiven over five (5) years. If occupancy is terminated voluntarily prior to the end of the loan term, the outstanding principal balance must be repaid. The loan may be forgiven if the applicant dies or involuntarily ceases to occupy the property as their primary residence and goes into an establishment that provides housing and general care for the aged or convalescent.</p>

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Acquisition, including preservation	Acquisition/rehabilitation of existing properties for conversion to affordable rental housing are eligible for funding, with special emphasis on preservation and/or adaptive reuse of historical properties.

Table 52 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

First program year allocations are based upon the most recent projections available at the time of report submission. CDBG allocations in future years are projected to remain steady with no significant cuts anticipated. HOME funds have slightly increased in recent years. The estimated HOME funding for future program years is projected to remain level; however, there are ongoing discussions of federal funding decreases to this program. ESG and HOPWA funding are expected to remain steady or increase slightly. No significant changes for these funding streams are anticipated or projected. The City is the lead applicant for competitive Continuum of Care (CoC) funds which have been successfully obtained for a number of years. The City typically receives about \$3M a year in CoC funding which is awarded competitively to help those who are homeless, and it remains a critical resource.

National Housing Trust Fund (HTF) awards are administered by the State under a structure similar to Low Income Housing Tax Credits (LIHTC). It is unknown at the present time if the City will pursue HTF funding through the State; however, if an opportunity arises to increase affordable housing production through this resource, application will be made.

The City has received application for Section 108 funding to fund renovation of the historic First National Center. The application is under review and if underwriting supports it, the City will make application to HUD. If additional opportunities materialize during the term of this Consolidated Plan, Section 108 Loan Guarantee applications may be submitted to further the City's ongoing economic development initiatives.

Supplemental CDBG-CV, ESG-CV and HOPWA-CV funding provided in response to the COVID-19 pandemic in FY 2019 will be carried forward in the First Action Plan Year under this Plan.

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	5,012,294	512,445	4,883,802	10,408,541	25,061,470	Program income represents \$2.1m from sale of property in early FY20. Prior year resources include 2019 unprogrammed funds, and recaptured program funds. Future allocations assume flat funding over the five (5) year life of the Plan (Amount available remainder of ConPlan in Yr 1=Annual allocation *5 yrs).

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	2,379,365	80,000	4,065,470	6,524,835	11,896,825	Prior year resources include unallocated 19 program funds, and recaptured program funds. Future allocations assume flat funding over the five (5) year plan period (i.e. Expected amount available for remainder of ConPlan in Yr 1= annual allocation*5)
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	894,069	0	0	894,069	4,470,345	Future funding projection assumes flat funding (i.e. Expected amount available for remainder of ConPlan in year 1= allocation *5)

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	427,832	0	0	427,832	2,139,160	Future allocations assume flat funding from year to year.(i.e. Expected amount available remainder of ConPlan in year 1=allocation *5)
Other	public - federal	Admin and Planning Economic Development Financial Assistance Public Services Rental Assistance Services STRMU	2,948,568	0	0	2,948,568	2,948,568	Supplemental CDBG-CV funding allocated in FY 2019 and carried forward to FY 2020.

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: \$		
Other	public - federal	Financial Assistance Overnight shelter Permanent housing in facilities Permanent housing placement Public Services Rapid re-housing (rental assistance) Rental Assistance Services Short term or transitional housing facilities STRMU Supportive services TBRA Transitional housing Other	1,475,283	0	0	1,475,283	1,475,283	Supplemental ESG-CV funding received in FY 2019 and carried forward to FY 2020. A significant amount of additional ESG-CV funding has been announced but has not yet been awarded and therefore is not projected as available.
Other	public - federal	Services STRMU Supportive services TBRA	130,112	0	0	130,112	130,112	Supplemental HOPWA-CV funding awarded in FY 2019 and carried forward to FY 2020.

Table 53 - Anticipated Resources

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 of HOME funds to be granted or loaned to Community Housing Development Organizations (CHDO's) for new home construction and rehabilitation/sale activities. CHDOs are encouraged to utilize private bank financing along with CHDO HOME funds (some provided as grants and some as loans) in providing affordable housing. Proposals for new projects are generally accepted when the CHDO has completed all previously funded projects. 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. New home construction is typically funded with private financing and other resources.

The City also provides local funding (general funds) to agencies that provide services to the homeless. Match for ESG programs is also required to be generated by the service providers who utilize these funds. 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 supports the achievement of home ownership and has proven to be an attractive program that stimulates significant interest among private lenders. During the 2018-2019 reporting period, the City leveraged its Down Payment Assistance program funds with private financial institution mortgage investments totaling \$2,048,184. Similar leverage can be anticipated annually in future program years.

The City may also assist developers by providing HOME funds to document community support for Low Income Housing Tax Credit (LIHTC) applications to the Oklahoma Housing Finance Agency (OHFA) when reasonable to do so. OHFA in past years has provided bonus points for applications that receive a minimum level of funding granted to the project from the local community. At present no bonus points are awarded for local support and funds have not been specifically allocated for this purpose in the First Action Plan Year. Developers may apply for funding in response to a Request for Proposals to develop affordable housing that may be issued when sufficient HOME funds exist; such and RFP is expected to be made available in the First Action Plan year.

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 northeast area of the city and seeks to develop many of their sites with mixed-income housing projects. Additionally, OCURA still owns numerous single infill lots and has an open solicitation for persons to develop housing; those lots are offered at a minimal sale price. 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, brownfields remediation, 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 and North Downtown.

The City owns 105 residential lots on the north side of Northwest 10th Street between Ellison Avenue to the east, and Virginia Avenue to the west. The eastern thirty-six (36) lots between Blackwelder and Ellison Avenues 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 selected developer defaulted on the Development Agreement and the lots were returned to the City in May 2019. A new RFP process will be undertaken this fiscal year (FY20) to select a new developer for the properties; some percentage of affordable housing is anticipated if housing is developed. The new offering will be expanded to include the additional sixty-nine (69) lots between Blackwelder and Virginia Avenue to the west. It is anticipated that redevelopment of these parcels will occur within the five (5) year Consolidated Plan period.

Discussion

Regarding required HOME program match contributions, Presidential Disaster Declarations and HUD match reduction for severe fiscal distress has eliminated the need to provide 25% match funding for the HOME program in most recent program years. Although match reductions or waivers cannot be projected in future years, it should be noted that the City has accumulated a significant banked match credit which will ensure that adequate leverage is available for new activities. However, The City of Oklahoma City continues to prioritize funding of projects that leverage private capital and non-federal funding.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Oklahoma City	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Public Housing Rental neighborhood improvements public facilities public services	Jurisdiction

**Table 54 - Institutional Delivery Structure
Assess of Strengths and Gaps in the Institutional Delivery System**

The City’s institutional structure for delivery of community development and affordable housing programs has the following strengths:

- Numerous nonprofit social service agencies that provide a wide variety of essential public services to low income and special needs populations, including programs for seniors, disabled, women and domestic violence survivors, and health-related services for low income populations;
- A local housing authority that effectively provides assisted housing programs and is actively involved with expanding, rehabilitating, and RAD conversion of its local supply of affordable housing;
- Expansion of CoC funding and increased CoC presence.
- Focus on issues related to homelessness is a high-profile issue at present, causing the Mayor to appoint a Mayor’s Task Force on Homelessness in 2019. A gaps and strengths analysis is underway by this group. Numerous stakeholders and service providers are providing input into this study with a goal to implement a Comprehensive Strategy to prevent homelessness in our community.
- Police department that has taken an active and critical role in helping homeless persons in the City.

- Citizens passed a new sales tax in 2019 for MAPs 4, which includes some funding for services such as mental health and affordable housing that should positively affect future efforts.
- Effective Strong Neighborhood Initiative (SNI) program that conducts wholistic neighborhood revitalization in selected neighborhoods.

However, the following gaps in institutional structure also exist:

- Limited number and capacity of nonprofit housing developers and CHDOs, with limited sources of funding for affordable housing, especially housing for extremely low income populations;
- Limited availability and supply of land and housing for increasing the supply of affordable housing units, and the high cost of such land and construction costs;
- Limited sources of funding for housing activities for both new construction and rehabilitation/preservation of older housing stock;
- Public transit improvements are needed.
- Lack of mental health resources, and limited substance abuse programs available.
- Limited shelter and transitional housing for unsheltered persons.
- Limited resources to address neighborhood revitalization outside of the SNI areas

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X	X	X
Utilities Assistance	X		X
Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics			
Other Street Outreach Services		X	
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X		
Employment and Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS	X	X	X
Life Skills	X	X	

Mental Health Counseling	X	X	
Transportation	X	X	
Other			
Domestic Violence Counseling	X	X	

Table 55 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

The City works with numerous nonprofit social services providers through the Continuum of Care (CoC) program. The CoC Board coordinates the City’s homeless assistance program and the development of the City’s annual grant application. The City also coordinates with providers to conduct an annual Point In Time (PIT) count of the City’s homeless population. Data gathered through this effort, coupled with consultation from an outside consultant and local service providers is used to develop the City’s homeless strategy. Oklahoma City provides the majority of housing and services for people who are homeless within the metropolitan area. In the 2019 PIT count 73% of those experiencing homelessness became homeless in Oklahoma.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Oklahoma City has focused on housing for the chronically homeless through funding from the HUD CoC competitive grant . This has been accomplished primarily via CoC permanent supportive housing, Housing Choice Vouchers, and a coordinated intake system which enables providers to pool resources and more effectively manage services. Since 2012, over 1,000 people have been housed with a retention rate between 80-90%. Using the annual PIT as a gauge of the needs of chronically homeless, the City through our community partnerships has worked to create permanent supportive housing beds in effort to eliminate homelessness.

In the last five (5) years, Oklahoma City has seen a slight decrease in the number of families with children experiencing homelessness. Since 2014, Oklahoma City has focused efforts through ESG on decreasing the number of families with children who enter shelters. The 2019 PIT count indicates the number of families with children in shelters decreased 9% from 2018. When considering the increased cost of housing and few prevention resources, the efforts made through the targeted initiatives have had a significant impact on this population.

Thanks primarily to increasing the efficiency of housing services, we have seen an overall downward trend in homelessness among almost every subpopulation since 2016. However, in the past two (2) years, the subset of people living in an unsheltered environment has increased by nearly 50%. To help

address this concern, the Continuum of Care Board allocated ESG funding to two (2) new outreach programs in 2019, and CDBG funding has been allocated to assist with the construction of a new, low-barrier emergency shelter.

Local service providers are also reporting an increase in homeless youth under the age of 21. Many of these youth maintain a transitory life-style (commonly referred to as "couch surfing"), so exact numbers are difficult to obtain. Among those affected, many have aged out of the foster care system at age 18 without subsequent housing options available to them. There continues to be a need for increased case management and housing options for this population. Oklahoma City has continued to increase efforts to locate and serve homeless youth. As this population is predominantly "couch homeless" making them not eligible for many of the resources available, two local foundations have increased funding to two (2) local youth service providers in past year in order to develop more youth beds, services and drop in centers.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The local 211 provider reports that utility and rental assistance are routinely within the top five categories of need for which they receive service calls. A person must work nearly 82 hours at minimum wage to afford a two (2) bedroom rental home at fair market rent, and Oklahoma City has the 20th highest eviction rate in the nation. The City of Oklahoma City recently passed a bond package to help address the housing situation; however, it will be several years before affordable housing units are developed. Meanwhile, the City, local foundations, and service providers are considering other avenues to increase the inventory of affordable units. To assist with these efforts, the Mayor has convened a Task Force on homelessness to execute a strategic plan to address homelessness in our community. The task force hired a consultant, Analytic Insight (A.I.) to conduct a gaps analysis and needs assessment, and to develop a comprehensive strategy to address homelessness which should be completed by July of 2020.

Grant funds covered under the Consolidated Plan and other grant funds are utilized in an efficient manner 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 racial segments of the population in the areas of concentrated lower-income persons to the greatest extent possible.

The primary weakness in the delivery system is lack of funds to address the identified needs within the community. The need for additional funding, or at minimum a higher CDBG public services cap above 15% is needed to support the many requests for public service activities which remain unfunded. The City has and 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.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing Construction and Development	2020	2024	Affordable Housing	NEIGHBORHOOD STRATEGY AREA	Creation and Retention of Affordable Housing	CDBG: \$350,000 HOME: \$3,871,526	Rental units constructed: 65 Household Housing Unit Homeowner Housing Added: 41 Household Housing Unit
2	Affordable Housing Retention and Rehabilitation	2020	2024	Affordable Housing	NEIGHBORHOOD STRATEGY AREA	Creation and Retention of Affordable Housing	CDBG: \$10,925,000 HOME: \$5,000,000	Rental units rehabilitated: 50 Household Housing Unit Homeowner Housing Rehabilitated: 1035 Household Housing Unit
3	Homebuyer Financial Assistance	2020	2024	Affordable Housing	NEIGHBORHOOD STRATEGY AREA	Creation and Retention of Affordable Housing	HOME: \$2,750,000	Direct Financial Assistance to Homebuyers: 150 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Elimination of Slum and Blight	2020	2024	Non-Housing Community Development		Elimination of Slum and Blight	CDBG: \$5,859,350	Housing Code Enforcement/Foreclosed Property Care: 750 Household Housing Unit Other: 5000 Other
5	General Public Services-CDBG	2020	2024	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Public Services	CDBG: \$4,983,063	Public service activities other than Low/Moderate Income Housing Benefit: 207575 Persons Assisted Other: 200 Other
6	Public Facilities and Infrastructure	2020	2024	Non-Housing Community Development	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Public Facilities and Infrastructure	CDBG: \$3,586,412	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 6 Households Assisted
7	Economic Development	2020	2024	Non-Housing Community Development	NEIGHBORHOOD STRATEGY AREA	Economic Opportunity	CDBG: \$950,000	Businesses assisted: 960 Businesses Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Support for the Homeless	2020	2024	Affordable Housing Homeless Non-Homeless Special Needs		Creation and Retention of Affordable Housing Public Services Prevention and Elimination of Homelessness Administration and Fair Housing Activities	HOPWA: \$4,474,160 ESG: \$2,124,160 ESG-CV: \$1,475,283 HOPWA-CV: \$130,112	Public service activities for Low/Moderate Income Housing Benefit: 5900 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 2075 Households Assisted Homeless Person Overnight Shelter: 9290 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 645 Beds Homelessness Prevention: 2625 Persons Assisted Housing for People with HIV/AIDS added: 1250 Household Housing Unit HIV/AIDS Housing Operations: 117 1750 Household Housing Unit
				Consolidated Plan	OKLAHOMA CITY			
OMB Control No: 2506-0117 (exp. 06/30/2018)								

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9	Administration Planning and Fair Housing	2020	2024	Program Administration		Administration and Fair Housing Activities	CDBG: \$5,012,295 HOME: \$1,993,368	Other: 1780 Other

Table 56 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable Housing Construction and Development
	Goal Description	CDBG and HOME funding for the development of affordable housing projects for low-moderate income households; to include acquisition, pre-development, and construction support to increase the supply of affordable housing units. Funds may be used to produce units for homeownership, single-family rental units, multifamily housing, or mixed-use developments. CDBG funds will support the creation of six (6) affordable homes in the Walnut Street LLC project. HOME funds are also provided for CHDO development projects. Funds will assist an estimated 65 families under the HOME AHDP solicitation, and an estimated 35 homes will be constructed annually with CHDO funds during this five-year Consolidated Plan.
2	Goal Name	Affordable Housing Retention and Rehabilitation
	Goal Description	CDBG and HOME funding to support whole house rehabilitation, exterior maintenance, and emergency repairs for low-moderate income homeowners. Funds will also be provided to assist in the rehabilitation of public housing units and OCHA inspection program. During this five-year Consolidated Plan, an estimated 95 homeowners will receive whole house rehabs, 650 homeowners will be assisted with emergency repairs, and 290 homeowners will benefit from exterior maintenance. An estimated 50 public housing rental units will be rehabilitated.
3	Goal Name	Homebuyer Financial Assistance
	Goal Description	HOME funds will be used to provide down payment assistance to approximately 30 low-moderate income homebuyers each year. An estimated 150 homebuyers will benefit from this assistance during this five-year Consolidated Plan. CDBG funds are under consideration for a future TBRA activity; however, have not been allocated to that purpose at the time of this report.

4	Goal Name	Elimination of Slum and Blight
	Goal Description	CDBG funding is allocated to the Oklahoma City Urban Renewal Authority to assist in URA completions, environmental remediation, acquisition, infrastructure development and other eligible activities to assist in disposition of urban renewal properties. CDBG funds are also used to secure vacant and abandoned housing under the City's Abandoned Housing Program. An estimated 150 units annually will be secured. Urban Renewal beneficiaries are inconsistent from year to year, and will be reported annually based upon actual assistance provided. 5,000 "other" indicated below is a rough estimate for URA activities, some of which will be area benefit.
5	Goal Name	General Public Services-CDBG
	Goal Description	CDBG funds are allocated to eligible public service activities, to include distinct activities for services provided within SNI neighborhoods and other general public service activities. Funded activities include youth STEAM after school program, hazardous tree removal, summer youth programs, support advocacy programs for foster youth (CASA), graffiti removal, transportation and courier services for special populations (COTPA), and legal services to prevent foreclosures and evictions. HUD has waived the 15% statutory cap on public service activities for the First Action Plan year. Therefore, a significant allocation has been made for unallocated public service activities to support urgent community needs related to the COVID-19 pandemic. Beneficiaries for unallocated funds have not been projected, pending identification of activities. Estimated funding below includes a five-year estimate of typically funded PS activities (\$4,140,000). The Legal Assistance Program (\$250,000) and unprogrammed PS dollars (\$583,063.39) are COVID-related and are counted only as first year resources.

6	Goal Name	Public Facilities and Infrastructure
	Goal Description	<p>CDBG funding is provided to assist in the development of public facilities, with a significant portion of these funds targeted in the SNI neighborhoods. SNI funds will support 1930 linear feet of new sidewalks in the Capitol Hill neighborhood and fifty (50) tree plantings. Eligible activities public facilities activities include sewer extensions, on-site infrastructure for non-profits organizations and affordable housing developments, alleys, sidewalks, park improvements, park amenities, ADA accessibility improvements, bus shelters, and tree planting. A significant allocation has also been made available in an open RFP for eligible public improvement projects under the Community Development Public Facilities Program. A potential park is under consideration which would serve an additional 874 households; however, it has not yet been funded and is not included in totals below. Allocated funding includes SNI allocation of \$685,00, Walnut Street infrastructure \$335,000, CF balance for prior projects \$121,578, and open solicitation for the Community Development Public Facilities Program \$1,979,833.36. No future allocations are projected at this time; however, may be considered in future program years if eligible projects are identified, subject to availability of resources. Projections for non-housing related PF projects are estimates at best, as projects funded from the RFP have not yet been identified.</p>
7	Goal Name	Economic Development
	Goal Description	<p>CDBG funds are allocated to support small businesses and microenterprises. Funded activities include the CAA small business training program (\$40,000) and microenterprise assistance programs. A Section 108 loan contingency (\$350,000) has been allocated to protect the CDBG investment in the event of a loan default. An estimated 184 businesses will be supported annually by CAA over the five-year Consolidated Plan Period. Estimated funding anticipates similar allocations to CAA in future program years. The Section 108 contingency is expected to be carried forward from year to year, assuming no loan defaults. The microenterprise program activity (\$400,000) is carried forward and projected to be expended in the first action plan year only, with a projected forty (40) beneficiaries.</p>

8	Goal Name	Support for the Homeless
	Goal Description	ESG, HOPWA and CoC funding are allocated to assist the homeless population. Activities supported include, but are not limited to, rapid re-housing, overnight shelters, transitional housing, permanent housing placement, outreach services, employment services, mental health services, domestic violence support, support of homeless youth, short term mortgage rent and utility assistance (STRMU), and case management services. Projected funding below anticipates level funding over the five (5) years covered by this Consolidated Plan. Additional ESG-CV funds have been announced but not yet awarded, therefore are not projected as available resources. Projected beneficiaries will increase substantially with these additional resources and will be reported in the annual CAPER as appropriate.
9	Goal Name	Administration Planning and Fair Housing
	Goal Description	Funding for administration is necessary to facilitate ongoing management and administration of formula grant programs. Administrative funds are used for staff support and program operations to ensure that CDBG, HOME, ESG, and HOPWA funds are allocated, tracked, disbursed and monitored in compliance with federal regulations. CDBG administrative funds are also used to support Fair Housing activities through Metro Alliance. A HUD waiver for the HOME program has allowed an increase in the FY 2020 Admin cap from 10% to 25%. The higher HOME admin is included in total funding for this first Action Year Plan (\$1,041,621.71 including carry-forward balance). The remainder of the Plan is estimated at 10% of the first year entitlement over the remaining four (4) years (\$9,51,746). Projected beneficiaries include the anticipated Metro Fair Housing complaint inquiries and investigations over the five(5) year Plan period.

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 91.315(b)(2)

During the five (5) year time frame covered by the Consolidated Plan, it is anticipated that the City of Oklahoma City will assist an estimated 2,400 households in the attainment or retention of affordable housing. This total includes new affordable units (both rental and home ownership), recipients of down payment assistance, rehabilitation program beneficiaries, previously homeless individuals housed in transitional units, and recipients of TBRA and STRMU assistance funded thru HOPWA.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

OCHA is not allowed to maintain a separate waiting list for accessible units; however, if an applicant's name rises to the top of the site-based waiting list, they can refuse the apartment and wait on one that is accessible without losing their place on the list. In some cases, a unit can be modified to meet the needs of the tenant at minimal cost. Approximately 10% of the units are handicapped accessible.

A summary of those in need of accessible public housing units appears in the table below. Please note that an individual can be on multiple waiting lists simultaneously; therefore, totaling each column would not provide an accurate representation of accessibility needs.

Activities to Increase Resident Involvements

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.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the 'troubled' designation

Not applicable. OCHA is a standard performer and is not identified as a troubled agency.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

This section identifies trends and practices that have been identified as impediments to the creation, sustainability and accessibility of affordable housing for low to moderate income families. Strategies to address these concerns are presented in Section SP-55.

- An Analysis of Impediments (AI) was completed for the City in March 2020. 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. Primary findings include rising rents and tightening of the rental market has disproportionately hurt very low income single-person households and families, many of whom are racial and ethnic minorities, persons with disabilities, and elderly residents.
- Similarly, rising home prices has introduced predatory lending and home purchase activity.
- Weak state laws to protect tenants from evictions without just cause exacerbates their vulnerability and increases homelessness, an undesirable outcome which is costly for the public sector.
- Residents and landlords would benefit from increased education and training, including fair housing laws and requirements and “good tenant” classes.
- Growing concern about the effect of city-facilitated redevelopment efforts on displacement of low income and minority residents.
- Multifamily developments are not being built to comply with the accessibility requirements under the Fair Housing Act due to lack of inspection/testing and enforcement.

The AI includes a Section with recommendations on revisions to the City’s development code. The City is undergoing an extensive rewrite of the development code to occur over the next few years. The code will be reviewed for changes needed with respect to the recommendations in the AI. Note several of these are not within the purview and/or the sole purview of the City but awareness of these issues could affect future policies or partnership efforts. Improvements to the transit system including bikeways, sidewalks, and Bus Rapid transit, as well as to parks are on-going efforts by the City.

The City's response to the noted impediments is more clearly defined in Section SP-55, and in AP-75 of the Annual Action Plan and will be reviewed annually to ensure compliance with Fair Housing requirements.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

This text belongs in the Introduction section above for "Barriers to Affordable Housing" which is not presently accessible in IDIS:

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. The most recent Analysis of Impediments document identified some potential barriers in current zoning rules. These include site standards, limits on density, definition of family and occupancy restrictions, and housing type limitations.

This text applies to this section on "Strategies to Remove or Ameliorate Barriers":

The City is in a process of comprehensive review and rewrite of the development code which will extend over the next several years. The identified issues will be reviewed during that process. Other noted recommendations, including fee waivers, and allowance of accessory dwelling units on single family lots will be considered.

The City is also in the process of consultant study of affordable housing issues in our community, which may result in other recommendations for changes to benefit the supply of affordable housing. Staff will continue to monitor changes in policy or codes that adversely affect affordable housing and will provide input on public policy proposals to reduce adverse impacts on affordable housing programs.

SP-60 Homelessness Strategy – 91.215(d)

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

To identify unsheltered homeless individuals and families, ESG funds are used for outreach activities to help connect this population with emergency shelter, housing and 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. The City convenes monthly Coordinated Outreach meetings with outreach services providers. These meetings allow outreach teams to coordinate efforts to identify and serve the unsheltered population.

Addressing the emergency and transitional housing needs of homeless persons

ESG funds may be used to provide essential services to homeless families and individuals in emergency shelters, and 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 tends 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 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 experiencing homelessness, 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. Once moved, clients 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 they move into permanent housing; and (2) to work with households after the move into permanent housing, to include connecting families with community based services to meet long term support/service needs, and to help solve remaining challenges that may threaten the client' tenancy (including difficulties sustaining housing or interacting with the landlord). Home-based case management remains 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 consists of permanent housing services. Permanent housing services help families and individuals access housing within twenty-one (21) days of assessment and sustain that housing for at least seven (7) months after exiting the program. This includes working with the client to identify affordable units, assisting them in accessing housing subsidies, and negotiating 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 of Oklahoma City connect 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/or 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

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

The ESG 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. These households are in immediate need of temporary rent or utility assistance, or additional financial assistance which would enable them 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 other units that meet minimum housing quality standards. Households receiving prevention assistance may need supportive services and follow-up care. The case manager is responsible for providing the appropriate supportive services and follow-up care as determined on a case by case basis. Generally, prevention assistance will last from one (1) to six (6) months. A standardized housing assessment and housing plan is 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 and/or 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 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 contacts the landlord or utility company immediately to pledge assistance in preventing or delaying imminent eviction or utility cutoff. If the case manager/Housing Resource Locator deems the housing to be substandard, then the case manager works with the household and the Housing Resource Locator to locate and secure more appropriate housing. Program participants must demonstrate the ability to earn adequate income 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 when necessary. Case managers also conduct monthly follow-ups for nine (9) months after the assistance terminates to ensure housing stability.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

The 2018 ACS data reflects that there are 185,613 occupied housing units constructed prior to 1980 that have the potential for lead contamination. The City funds various activities that fall into the category of residential rehabilitation. Since September 15, 2000, when a residential rehabilitation activity funded by the City is conducted, the regulations in 24 CFR Part 35 for lead-based paint are used as the guide for achieving compliance. Under the regulations, the City is required to follow the approaches to Lead Hazard evaluation, provide the proper notifications, perform the Lead Hazard evaluation, and follow the safe work practices and clearance requirements.

Contractors performing rehabilitation work on projects in a cost range of \$5,000 to \$25,000 must provide supervision by a State licensed supervisor to comply with lead-based paint regulations. The Oklahoma Department of Environmental Quality (DEQ) manages licensing/certification requirements. Workers engaged in curing lead-based paint defects do not have to be licensed, but they are required to attend a DEQ workshop on protection.

City staff functioning in the positions of Risk Assessor or Inspector must be licensed by DEQ. At present, all of the Oklahoma City rehabilitation specialists are licensed. The City has acquired XRF testing devices, and all rehabilitation inspectors are qualified to perform the tests required on residential structures, including the clearance certification after abatement work has been performed.

The City's housing rehabilitation staff conducts assessment of lead-based hazards in all pre-1978 homes accepted into the housing rehabilitation program workflow.

The Oklahoma City Housing Authority complies with the lead-based paint hazard reduction requirements in assisted properties. OCHA requires that all lessors disclose the presence of lead-based paint and/or lead based paint hazards in the dwelling for all pre-1978 housing. Lessees must also receive a federally approved pamphlet on lead poisoning prevention. Housing exclusively for the elderly or disabled, or those without children under six (6) years of age residing in the unit, are exempted from receiving the federally approved pamphlet.

The City's rehabilitation inspection staff conducts all lead-based testing, assessment, and clearance inspections for all sub-grantee and CHDO organizations except in cases where those organizations have contracted with other testing entities.

How are the actions listed above related to the extent of lead poisoning and hazards?

All applicants to the City's Rehabilitation programs receive priority for contracting and funding when lead based paint is present in a home with children.

How are the actions listed above integrated into housing policies and procedures?

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 approved Housing Rehabilitation Program Policies include these provisions.

The City's housing rehabilitation program reports to the (OSDH) Health Department on all children living in properties tested where the presence of lead-based paint is found. City staff communicates with the OSDH on other lead related issues. In the past, City staff have also participated in a training workshop in cooperation with the City-County Health Department for citizens and health care professionals concerning lead-based paint. The workshop was held at no cost to participants.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing 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 that cumulatively work to reduce poverty. In 1993, the citizens of Oklahoma City passed the first Metropolitan Area Projects initiative, a five year, \$350 million sales tax program to construct or redevelop numerous public facilities that include a downtown library, new arena, minor league baseball stadium, river dams and a canal in Bricktown as well as improvements to the State Fairgrounds. The successful implementation of the program resulted in the private sector construction of numerous hotels, eating establishments and retail facilities in downtown and Bricktown areas. MAPS ultimately cost approximately \$300 million and resulted in over \$2 billion in private investment and significant job creation.

The initial MAPS initiative was followed by a larger \$514 million "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 substantial 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. The third MAPS initiative totaling \$777 million was passed by the citizens of Oklahoma City in December 2009. MAPS 3 projects are mostly completed and have continued the public facilities improvements started with the first MAPS vote. MAPS 3 provided funding for a seventy (70) acre downtown regional park, a 4.5 mile electric streetcar route, a new downtown convention center, neighborhood sidewalks and trails, health and wellness centers for seniors, additional improvements to the Oklahoma State Fairgrounds and a white water course on the Oklahoma River.

Voters recently approved a \$978 million MAPS 4 initiative in December 2019. Proposed projects to be completed over the next eight (8) years include additional transit improvements and infrastructure, public park improvements, a multi-purpose stadium, a civil rights museum, additional trails and sidewalks, a new state fair arena, improvements to the Chesapeake Arena, and a new animal shelter and funding for affordable housing. Unlike the previous MAPS initiatives which focused primarily on large capital improvement projects, MAPS 4 also provides substantial funding to support mental health services and victims of domestic violence. This increased emphasis on social services is expected to have significant impact in terms of reducing the number of poverty-level families and preventing homelessness. The total local public investment in MAPS programs exceeds \$2.6 billion in public funding.

Significant private investment has also been made, as these projects have served as a catalyst for economic growth. 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. The City will continue to focus most of our ESG resources on prevention

and rehousing assistance, as well as HOPWA assistance for services that provide similar benefit. This can assist some individuals and families to stabilize, and eventually escape from poverty. However, they represent only a fraction of the city's total population who are spending more than a third of their income on housing.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan?

The City places a high priority on mixed income neighborhoods and deconcentration of poverty. All funding decisions are sensitive to the highest levels of need, and the desire to allocate limited resources strategically to provide a holistic approach to neighborhood revitalization.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Oklahoma City monitors all activities it funds with federal grants. A compliance review is conducted for all sub-recipients on at least an annual basis.

Office of the City Auditor, Outside Auditor (A-133), and the Office of Inspector General:

1. The City's internal auditors randomly audit various programs in city departments.
2. As part of the annual independent A-133 audit, federally funded activities are audited to determine compliance with grant provisions and federal guidelines. The City Manager, City Council and the auditing firm review any responses to exceptions and corrective actions.
3. Agreements with sub-grantees require annual independent audits be made and typically that copies of the audits be provided to the City within 30-days of receipt by the agency. The audit reports are reviewed along with corrective actions for any exceptions found.
4. The documentation required in support of federal draw-down requests is also required to access funds through the City's procurement system.

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

When Subgrantees are monitored, the following procedures are followed:

- Prepare schedule of monitoring visits.
- Notify subrecipients of date(s) set for monitoring visit(s).
- Review with subrecipient the monitoring checklist that will be used as a monitoring guide.
- Conduct the monitoring review as follows:
 - As applicable, check minutes of Board meetings for actions, authorizations affecting operations, expenditures, and personnel actions.
 - Review time records and other documents relating to time spent on program activities.
 - Check deposit records.
 - Check expenditures by examining vouchers, supporting documentation and/or canceled checks to determine eligibility of costs.
 - Determine that books of account(s) agree with the reports submitted by the funded agency.
 - Review records to determine eligibility of low and moderate income beneficiaries, to include examination of income source documents.
 - Determine that requested funds are spent timely, if applicable.

- Conduct an exit interview to review findings and/or concerns noted during the audit with relevant agency staff.
- Prepare a written report to the Board Chairperson/President relating the method of review, determination of compliance, concerns, findings or other relevant comments. The letter must identify a deadline for correction or submission of information and must offer technical assistance if appropriate.
- Subgrantee monitoring reports are presented to the Division Head of the Housing & Community Development Division for review.

Expected Resources

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

Introduction

First program year allocations are based upon the most recent projections available at the time of report submission. CDBG allocations in future years are projected to remain steady with no significant cuts anticipated. HOME funds have slightly increased in recent years. The estimated HOME funding for future program years is projected to remain level; however, there are ongoing discussions of federal funding decreases to this program. ESG and HOPWA funding are expected to remain steady or increase slightly. No significant changes for these funding streams are anticipated or projected. The City is the lead applicant for competitive Continuum of Care (CoC) funds which have been successfully obtained for a number of years. The City typically receives about \$3M a year in CoC funding which is awarded competitively to help those who are homeless, and it remains a critical resource.

National Housing Trust Fund (HTF) awards are administered by the State under a structure similar to Low Income Housing Tax Credits (LIHTC). It is unknown at the present time if the City will pursue HTF funding through the State; however, if an opportunity arises to increase affordable housing production through this resource, application will be made.

The City has received application for Section 108 funding to fund renovation of the historic First National Center. The application is under review and if underwriting supports it, the City will make application to HUD. If additional opportunities materialize during the term of this Consolidated Plan, Section 108 Loan Guarantee applications may be submitted to further the City’s ongoing economic development initiatives.

Supplemental CDBG-CV, ESG-CV and HOPWA-CV funding provided in response to the COVID-19 pandemic in FY 2019 will be carried forward in the First Action Plan Year under this Plan.

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: \$		

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	5,012,294	2,104,737	2,476,431	9,593,462	25,061,470	Program income represents \$2.1m from sale of property in early FY20. Prior year resources include 2019 unprogrammed funds, and recaptured program funds. Future allocations assume flat funding over the five (5) year life of the Plan (Amount available remainder of ConPlan in Yr 1=Annual allocation *5 yrs).

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	2,379,365	80,000	608,784	3,068,149	11,896,825	Prior year resources include unallocated 19 program funds, and recaptured program funds. Future allocations assume flat funding over the five (5) year plan period (i.e. Expected amount available for remainder of ConPlan in Yr 1= annual allocation*5)
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	894,069	0	0	894,069	4,470,345	Future funding projection assumes flat funding (i.e. Expected amount available for remainder of ConPlan in year 1= allocation *5)

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	427,832	0	0	427,832	2,139,160	Future allocations assume flat funding from year to year.(i.e. Expected amount available remainder of ConPlan in year 1=allocation *5)
Other	public - federal	Admin and Planning Economic Development Financial Assistance Public Services Rental Assistance Services STRMU	2,948,568	0	0	2,948,568	2,948,568	Supplemental CDBG-CV funding allocated in FY 2019 and carried forward to FY 2020.

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: \$		
Other	public - federal	Financial Assistance Overnight shelter Permanent housing in facilities Permanent housing placement Public Services Rapid re-housing (rental assistance) Rental Assistance Services Short term or transitional housing facilities STRMU Supportive services TBRA Transitional housing Other	1,475,283	0	0	1,475,283	1,475,283	Supplemental ESG-CV funding received in FY 2019 and carried forward to FY 2020. A significant amount of additional ESG-CV funding has been announced but has not yet been awarded and therefore is not projected as available.
Other	public - federal	Services STRMU Supportive services TBRA	130,112	0	0	130,112	130,112	Supplemental HOPWA-CV funding awarded in FY 2019 and carried forward to FY 2020.

Table 57 - 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 of HOME funds to be granted or loaned to Community Housing Development Organizations (CHDO's) for new home construction and rehabilitation/sale activities. CHDOs are encouraged to utilize private bank financing along with CHDO HOME funds (some provided as grants and some as loans) in providing affordable housing. Proposals for new projects are generally accepted when the CHDO has completed all previously funded projects. 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. New home construction is typically funded with private financing and other resources. T

The City also provides local funding (general funds) to agencies that provide services to the homeless. Match for ESG programs is also required to be generated by the service providers who utilize these funds. 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 supports the achievement of home ownership and has proven to be an attractive program that stimulates significant interest among private lenders. During the 2018-2019 reporting period, the City leveraged its Down Payment Assistance program funds with private financial institution mortgage investments totaling \$2,048,184. Similar leverage can be anticipated annually in future program years.

The City may also assist developers by providing HOME funds to document community support for Low Income Housing Tax Credit (LIHTC) applications to the Oklahoma Housing Finance Agency (OHFA) when reasonable to do so. OHFA in past years has provided bonus points for applications that receive a minimum level of funding granted to the project from the local community. At present no bonus points are awarded for local support and funds have not been specifically allocated for this purpose in the First Action Plan Year. Developers may apply for funding in response to a Request for Proposals to develop affordable housing that may be issued when sufficient HOME funds exist; such and RFP is expected to be made available in the First Action Plan year.

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 northeast area of the city and seeks to develop many of their sites with mixed-income housing projects. Additionally, OCURA still owns numerous single infill lots and has an open solicitation for persons to develop housing; those lots are offered at a minimal sale price. 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, brownfields remediation, 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 and North Downtown.

The City owns 105 residential lots on the north side of Northwest 10th Street between Ellison Avenue to the east, and Virginia Avenue to the west. The eastern thirty-six (36) lots between Blackwelder and Ellison Avenues 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 selected developer defaulted on the Development Agreement and the lots were returned to the City in May 2019. A new RFP process will be undertaken this fiscal year (FY20) to select a new developer for the properties; some percentage of affordable housing is anticipated if housing is developed. The new offering will be expanded to include the additional sixty-nine (69) lots between Blackwelder and Virginia Avenue to the west. It is anticipated that redevelopment of these parcels will occur within the five (5) year Consolidated Plan period.

Discussion

Regarding required HOME program match contributions, Presidential Disaster Declarations and HUD match reduction for severe fiscal distress has eliminated the need to provide 25% match funding for the HOME program in most recent program years. Although match reductions or waivers cannot be projected in future years, it should be noted that the City has accumulated a significant banked match credit which will ensure that adequate leverage is available for new activities. However, The City of Oklahoma City continues to prioritize funding of projects that leverage private capital and non-federal funding.

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing Construction and Development	2020	2024	Affordable Housing		Creation and Retention of Affordable Housing	CDBG: \$350,000 HOME: \$3,871,526	Rental units constructed: 65 Household Housing Unit Homeowner Housing Added: 6 Household Housing Unit
2	Affordable Housing Retention and Rehabilitation	2020	2024	Affordable Housing		Creation and Retention of Affordable Housing	CDBG: \$2,185,000 HOME: \$1,000,000	Rental units rehabilitated: 10 Household Housing Unit Homeowner Housing Rehabilitated: 207 Household Housing Unit
3	Homebuyer Financial Assistance	2020	2024	Affordable Housing		Creation and Retention of Affordable Housing	HOME: \$550,000	Direct Financial Assistance to Homebuyers: 30 Households Assisted
4	Elimination of Slum and Blight	2020	2024	Non-Housing Community Development			CDBG: \$1,171,870	Housing Code Enforcement/Foreclosed Property Care: 150 Household Housing Unit Other: 1 Other
5	General Public Services-CDBG	2020	2024	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development		Public Services	CDBG: \$1,663,063	Public service activities for Low/Moderate Income Housing Benefit: 765 Households Assisted Other: 200 Other
6	Public Facilities and Infrastructure	2020	2024	Non-Housing Community Development		Public Facilities and Infrastructure	CDBG: \$3,586,412	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 6 Households Assisted Other: 1 Other
7	Economic Development	2020	2024	Non-Housing Community Development		Economic Opportunity	CDBG: \$790,000	Businesses assisted: 215 Businesses Assisted

8	Support for the Homeless	2020	2024	Affordable Housing Homeless Non-Homeless Special Needs		Creation and Retention of Affordable Housing Public Services Prevention and Elimination of Homelessness	HOPWA: \$894,069 ESG: \$427,832	Public service activities for Low/Moderate Income Housing Benefit: 1180 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 415 Households Assisted Homeless Person Overnight Shelter: 1858 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 129 Beds Homelessness Prevention: 525 Persons Assisted Housing for People with HIV/AIDS added: 250 Household Housing Unit HIV/AIDS Housing Operations: 350 Household Housing Unit
9	Administration Planning and Fair Housing	2020	2024	Program Administration		Administration and Fair Housing Activities	CDBG: \$1,002,459 HOME: \$1,041,622	Other: 356 Other

Table 58 – Goals Summary

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Goal Descriptions

1	Goal Name	Affordable Housing Construction and Development
	Goal Description	FY 2019-20 CDBG funding in the amount of \$350,000 is carried forward and will be used to acquire property for the development of six (6) affordable units in the Walnut St LLC project. HOME funds will support CHDO housing construction in the Walnut Street project. A Request for Proposals (RFP) will be issued for new affordable housing development proposals. Funding for the RFP includes \$767,363.81 carried forward from prior program years and \$1,232,636.19 in FY 2020-21 funding. It is estimated that the RFP will result in development of approximately 65 units in a future program year. Prior year funding to Metro Alliance in the amount of \$6,191.50 will be carried forward and unallocated CHDO funds in the amount of \$1,196,939.29 will be carried forward for future development projects. \$159,409.90 previously allocated to CHDO developments for Jefferson Park, Paseo, and NHS has also been carried forward. New FY 2020-21 CHDO setaside funds total \$356,904.75.
2	Goal Name	Affordable Housing Retention and Rehabilitation
	Goal Description	HOME funds in the amount of \$1 million will be allocated for whole house rehabilitations. This includes \$830,000 carried forward from the prior program year and a new FY 2020-21 allocation of \$170,000. CDBG funds support multiple housing retention programs. An allocation of \$1.3 million, inclusive of program delivery costs, will fund the City's Exterior Maintenance Program (approximately 58 units), \$50,000 is allocated to the OCHA inspection program, \$235,000 is provided to OCHA for the rehabilitation of approximately ten (10) public housing units, and \$600,000 is allocated to the City's Emergency Repair Program to assist approximately 130 low to moderate income homeowners. This includes \$454,323 carried forward from the prior program year and a new FY 2020-21 allocation of \$145,677.
3	Goal Name	Homebuyer Financial Assistance
	Goal Description	HOME funds in the amount of \$550,000 are used to assist approximately thirty (30) low to moderate income homebuyers. Of this amount, \$50,000 will be carried forward from the prior program year. A new FY 2020-21 allocation will be provided in the amount of \$500,000.

4	Goal Name	Elimination of Slum and Blight
	Goal Description	CDBG funds in the amount of \$788,880 have been allocated to the Oklahoma City Urban Renewal Authority (OCURA) to assist with urban renewal completions, property maintenance and disposition. An additional \$307,990 in CDBG program income is made available to OCURA for future eligible activities, subject to the City's approval. \$75,000 is made available for spot blight thru the City's Abandoned Housing Program to secure vacant and abandoned properties. Of this amount, \$5,000 is carried forward from the prior program year and \$70,000 in FY 2020-21 funding is provided.
5	Goal Name	General Public Services-CDBG
	Goal Description	CDBG funds are used to support multiple public service activities. Please note that HUD has provided a temporary waiver of the 15% cap on these funds in FY 2019 and FY 2020. A significant allocation of \$625,000 is provided to support public service activities in our SNI neighborhoods. This program provides several different services, including but not limited to neighborhood capacity building, youth services and after-school programs, hazardous tree removals and summer youth programs. CDBG funds in the amount of \$105,000 are allocated to COTPA to provide discounted bus and taxi fares, and courier services to special populations. \$10,000 is allocated for Graffiti Removal. \$60,000 is allocated to Community Health Services for services to the homeless. A new FY 2020-21 program provides \$30,000 to CASA to provide mentoring for youth in foster care. \$250,000 in CDBG funds is carried forward from FY 2019 for legal services to assist in the prevention of foreclosures and evictions. A new FY 2020-21 allocation of \$583,063.39 is being programmed for future TBD public service activities to respond to the COVID-19 pandemic.
6	Goal Name	Public Facilities and Infrastructure
	Goal Description	CDBG funds are allocated for the support of various public facilities activities. A new FY 2020-21 allocation of \$335,000 will be used to assist in the development of infrastructure for the Walnut Street LLC project. \$350,000 was allocated to this development in FY 2019-20 for property acquisition. A significant allocation of \$800,000 has been made available to the SNI neighborhoods for neighborhood grant projects, tree plantings, and new sidewalks in the Capitol Hill neighborhood. \$121,578.90 has been carried forward for the City Care project from prior program years. There remains an open solicitation for new public facilities proposals. \$979,833.36 has been carried forward from prior program years, and a new FY 2020-21 allocation in the amount of \$1 million increased the funds available for this activity to \$1,979,833.36. Estimated benefit will far exceed the 6 Walnut Street units reported below; however, until proposals have been received and vetted, we are unable to project the number of beneficiaries.

7	Goal Name	Economic Development
	Goal Description	CDBG funds in the amount of \$350,000 have been carried forward from prior program years as a contingency for potential defaults on Section 108 loans which would otherwise need to be paid from entitlement. \$40,000 has been allocated to the Community Action Agency for small businesses services. A new OCURA Microenterprise Program was established in April 2020 with FY 2019 funds in the amount of \$400,000. These funds have been carried forward to FY 2020-21 and applications are now being accepted.
8	Goal Name	Support for the Homeless
	Goal Description	ESG and HOPWA funds are used to provide housing, services, and case management to prevent and respond to persons in a housing crisis. A substantial carry forward of ESG-CV funding is also expected to be expended during the first Action Plan Year. Additional ESG-CV funding is anticipated but has not yet been formally awarded.
9	Goal Name	Administration Planning and Fair Housing
	Goal Description	HOME and CDBG funding is allocated for the management and administration of federal programs. CDBG admin funds in the amount of \$60,000 are also used to support planning activities and \$83,000 is allocated in FY 2020-21 for Fair Housing investigations. \$859,459 in CDBG funds are allocated for administration. A HUD waiver in FY 2019 and FY 2020 provides an increase in the administrative cap for HOME funds from 10% to 25% to respond to the COVID-19 pandemic. The HOME program administrative allocation of \$1,041,621.71 includes \$446,780 carried forward from prior program years and \$594,841.25 in FY 2020-21 funding. All beneficiaries are reported under individual projects and activities, with the exception of persons assisted with Fair housing investigations (356 persons).

Projects

AP-35 Projects – 91.220(d)

Introduction

The following initiatives and goals for the First Action Year Plan are consistent with those established in this new Five-Year Consolidated Plan with an effective date of July 1, 2020, 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 Solutions Grant Program.
- 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 in this First Action Year Plan specifically relate to the goals outlined in the 2020-2025 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 First Action Year Plan (fiscal year July 1, 2020 through June 30, 2021), follow the priorities established in the five-year Consolidated Plan that expires June 30, 2025. The First 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 The City of Oklahoma City.

The funding recommendations for the 2020-2021 First Action Year Plan were considered by the Citizen’s Committee for Community Development on June 9, 2020 and received their favorable recommendation. Final Plan approval was granted by the City Council on July 7, 2020.

Projects

#	Project Name
1	Affordable Housing Development Program
2	Affordable Housing Rehab/Retention
3	Down Payment Assistance Program
4	Slum and Blight Remediation
5	SNI Public Services Activities
6	SNI Public Facilities Activities
7	Community Development-Public Service Activities
8	Community Development- Public Facilities Activities
9	Economic Development Programs
10	Homeless Programs
11	Program Administration and Planning

Table 31 – Project Information

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

The FY 2020-21 First Year Annual Action Plan was impacted significantly by urgent community needs related to the COVID-19 Pandemic. Substantial resources have been made available for general public services, legal assistance, non-profit support, and foreclosure/eviction prevention. The City continues to prioritize affordable housing and homelessness prevention activities. Many obstacles to addressing underserved needs have been mitigated in this First Action Plan Year due to the temporary waiver of the public services cap and a higher administration cap in the HOME program. CHDO capacity remains a barrier to significant affordable housing production.

AP-38 Project Summary
Project Summary Information

1	Project Name	Affordable Housing Development Program
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Affordable Housing Construction and Development
	Needs Addressed	Creation and Retention of Affordable Housing
	Funding	CDBG: \$350,000 HOME: \$2,000,000
	Description	The Affordable Housing Development Program includes housing activities that result in the development and creation of new affordable housing units for low to moderate income families. Funded activities include \$350,000 in CDBG funds carried forward for the Walnut Street LLC project for acquisition to support the development of six (6) affordable units, and \$2 million in HOME funds allocated for an RFP under the Affordable Housing Development Program. The AHDP allocation includes \$767,363.81 carried forward from the prior program year and a new allocation of \$1,232,636.19. A small balance of \$6,191.50 has been carried forward for the Metro Alliance project funded in the prior program year.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Six (6) low to moderate income families will achieve homeownership in the Walnut Street LLC project. An estimated sixty-five (65) affordable housing units will be developed under the HOME program AHDP RFP.
	Location Description	The Walnut Street LLC project is located at the intersection of NE 26th St and N. Walnut Ave.
	Planned Activities	Acquisition of lots for the development of six (6) affordable housing units in the Walnut Street LLC project, and development of an estimated sixty-five affordable units through an open RFP for the HOME program Affordable Housing Development Program.
2	Project Name	Affordable Housing Rehab/Retention
	Target Area	
	Goals Supported	Affordable Housing Retention and Rehabilitation
	Needs Addressed	Creation and Retention of Affordable Housing Prevention and Elimination of Homelessness
	Funding	CDBG: \$2,185,000 HOME: \$1,000,000 CDBG-CV: \$1,000,000

	Description	The Affordable Housing Rehab/Retention program assist current low to moderate income homeowners with whole-house rehabilitation, exterior maintenance and emergency repairs. CDBG funds are also used to rehabilitate an estimated ten (10) public housing units. Funded activities include \$1.3 million for the OKC Housing Assistance Program (Exterior Maintenance) which includes program delivery costs, \$50,000 in CDBG funds to support the OCHA Housing Inspection Program, \$235,000 in CDBG funds to OCHA for the rehabilitation of public housing units, and \$600,000 to Community Action Agency for the Emergency Home Repair Program, which includes \$145,677 carried forward from the prior program year and a new FY 2020-21 allocation of \$454,323. \$1 million is carried forward from FY 2019 for the CDBG-CV program to provide short term mortgage, rent and utility assistance to persons impacted by the COVID-19 pandemic. HOME funds in the amount of \$1 million are allocated to the OKC Housing Assistance Program for whole-house rehabs. This includes \$830,000 carried forward from the prior program year and a new FY 2020-21 allocation of \$170,000.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	An estimated fifty-eight (58) homeowners will receive exterior maintenance repairs, nineteen (19) homeowners will receive whole-house rehabilitations, 130 homeowners will receive emergency repairs, and an estimated ten (10) public housing units will be rehabilitated. An estimated 275 households impacted by COVID-19 will receive short term mortgage, rent and utility assistance from prior year CDBG-CV supplemental funds.
	Location Description	City wide, with emphasis in the NRSA.
	Planned Activities	Exterior maintenance repairs, emergency home repairs, whole-house rehabilitation, short term mortgage\rent\utilities assistance, and rehab of public housing units.
3	Project Name	Down Payment Assistance Program
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Homebuyer Financial Assistance
	Needs Addressed	Creation and Retention of Affordable Housing
	Funding	HOME: \$550,000

	Description	\$550,000 in HOME funds are allocated to provide financial assistance with down payments and closing costs up to \$15,000 for low to moderate income homebuyers, with a spending goal of 80% within the NRSA when practicable. If unable to timely meet this goal, DPA funding may be spent in non-targeted areas. Allocation includes \$50,000 carried forward from the prior program year and a new FY 2020-21 allocation of \$500,000. In response to public comment, the affordability period for the DPA program is being extended to seven (7) years.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	An estimated thirty (30) homebuyers will be provided downpayment and closing cost assistance during the program year.
	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.
4	Project Name	Slum and Blight Remediation
	Target Area	
	Goals Supported	Elimination of Slum and Blight
	Needs Addressed	Slum and Blight Remediation
	Funding	CDBG: \$1,171,870

	Description	Slum and blight activities include 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. A new allocation of \$788,880 will be provided in 2020-21. Prior year balance has been recaptured and reprogrammed. Funds carried forward in the amount of \$317,900 are also available to OCURA 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, public infrastructure, microenterprise assistance, and housing for the benefit of low to moderate individuals or low-mod income areas. CDBG funds in the amount of \$75,000 are allocated to the OKC Abandoned housing Program to secure vacant and abandoned homes to remove imminent threats to life, health, and safety. The abandoned housing allocation includes \$5,000 carried forward from the prior program year and a new FY 2020-21 allocation of \$70,000.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	The number of program beneficiaries is contingent on the type, size and scale of projects funded.
	Location Description	Urban Renewal Project Areas
	Planned Activities	Securing vacant and abandoned properties, acquisition, disposition, clearance, relocation, and Urban Renewal completion activities.
5	Project Name	SNI Public Services Activities
	Target Area	Strong Neighborhoods Initiative
	Goals Supported	General Public Services-CDBG
	Needs Addressed	Public Services Prevention and Elimination of Homelessness
	Funding	CDBG: \$625,000

	Description	CDBG funding in the amount of \$625,000 (which includes any funds carried forward from FY19) is provided to support eligible public service activities in designated SNI neighborhoods. These activities include but are not limited to an after-school STEAM program for students, summer programming for youth, education, homeless prevention, neighborhood project grants, community outreach, and hazardous tree removals.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 400 students will be served thru the STEAM program. Approximately fifty (50) hazardous trees will be removed, and three (3) neighborhood project grants will be awarded to SNI neighborhoods.
	Location Description	Designated Strong Neighborhoods Initiative neighborhoods (Metro Park, Capitol View, and Capitol Hill).
	Planned Activities	After school programming, summer youth programs, neighborhood-led project development, and hazardous tree removals.
6	Project Name	SNI Public Facilities Activities
	Target Area	Strong Neighborhoods Initiative
	Goals Supported	Public Facilities and Infrastructure
	Needs Addressed	Public Facilities and Infrastructure
	Funding	CDBG: \$800,000
	Description	CDBG funds in the amount of \$800,000 (which includes any balance carried forward from FY19) are allocated to support eligible public facilities activities in designated SNI neighborhoods, including but not limited to tree plantings, sidewalk installation, alley construction, park improvements, bus shelters, street signage, and neighborhood led project grants. FY 2020-21 proposed activities include the installation of 1930 linear feet of sidewalks in the Capitol Hill neighborhood, and fifty (50) tree plantings.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Sidewalk installation will provide community-wide area benefit. Fifty (50) households will benefit from tree plantings.
	Location Description	Activities are limited to designated Strong Neighborhoods Initiative neighborhoods (Metro Park, Capitol View, and Capitol Hill).
	Planned Activities	Sidewalk installation and tree planting

7	Project Name	Community Development-Public Service Activities
	Target Area	
	Goals Supported	General Public Services-CDBG
	Needs Addressed	Public Services Prevention and Elimination of Homelessness
	Funding	CDBG: \$1,038,063
	Description	CDBG funds are used to fund general public service activities in the community. \$105,000 has been allocated to COTPA for the provision of discounted bus and taxi fares and courier services for special populations. \$10,000 is allocated to the Graffiti Removal program. \$60,000 is allocated to Community Health Services Healing Hands program to provide healthcare services for the homeless. A new program has been established to provide \$30,000 to Court Appointed Special Advocates for Children to provide advocacy services for youth in the foster care system. \$250,000 has been carried forward from the prior program year for a Legal Assistance Program to assist in the prevention of foreclosures and evictions. Due to the waiver of the public services cap in FY 2020-21, \$583,063.39 has been unprogrammed and will be used to provide additional eligible public service activities.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 200 locations will be assisted with graffiti removal. Fifteen (15) foster youth will be provided with advocacy resources. An estimated 450 homeless persons will receive healthcare services. Approximately 100 persons will access legal services to prevent foreclosure or eviction. Approximately 40,400 discounted bus and taxi coupons will be provided to special populations. Additional beneficiaries will be realized from future TBD public service activities; however, cannot be projected at the present time.
	Location Description	City-Wide
	Planned Activities	Foster Care Advocacy, Health care services for the homeless, graffiti removal, transportation and courier services to special populations, legal assistance, and other eligible public service activities.
8	Project Name	Community Development- Public Facilities Activities
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Public Facilities and Infrastructure
	Needs Addressed	Public Facilities and Infrastructure

	Funding	CDBG: \$2,786,412
	Description	CDBG funds are allocated for the support of eligible public facilities activities. \$335,000 has been allocated to the Walnut Street LLC project for infrastructure development to support the construction of six (6) affordable housing units. There is presently an open solicitation for proposals under the Community Development Public Facilities Program in the amount of \$1,979,833.36. This includes \$979,833.36 carried forward from prior program years and a new FY 2020-21 allocation of \$1 million. \$9,736.54 has been carried forward for the First Step Metro Alliance project. \$121,578.90 for the City Care project has been carried forward from prior program years.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Six (6) low to moderate income homebuyer will achieve homeownership following development of infrastructure in the Walnut Street LLC project. Additional beneficiaries will be realized thru the open CDPF Program solicitation; however, beneficiaries cannot be projected at the present time.
	Location Description	Walnut Street LLC project is located at the intersection of NE 26th Street and N. Walnut Avenue.
	Planned Activities	Infrastructure development and other eligible public facilities activities.
9	Project Name	Economic Development Programs
	Target Area	
	Goals Supported	Economic Development
	Needs Addressed	Economic Opportunity
	Funding	CDBG: \$790,000 CDBG-CV: \$1,300,000
	Description	CDBG funds are allocated to support economic development programs, including but not limited to small business services, microenterprise support, and a loan contingency for potential Section 108 loan default(s). \$350,000 is carried forward from FY 2019 as a default contingency for Section 108 loans to protect the CDBG investment. \$40,000 is allocated to Community Action Agency to fund a small business training program. \$400,000 is carried forward from FY 2019 for the OCURA Microenterprise Program. \$1.3 million in CDBG-CV funds have been carried forward from FY 2019 to provide support to non-profit organizations suffering from loss of revenue and/or an increase in service demands due to the COVID-19 pandemic.

	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 175 small businesses will receive training and technical assistance. An estimated forty (40) microenterprise businesses will receive assistance. An estimated fifty (50) non-profit organizations impacted by the COVID-19 pandemic will be provided one-time grants from prior year CDBG-CV funds up to \$24,000.
	Location Description	City-Wide
	Planned Activities	Small business training, microenterprise assistance, and support to non-profits impacted by the COVID-19 pandemic.
10	Project Name	Homeless Programs
	Target Area	
	Goals Supported	Support for the Homeless
	Needs Addressed	Creation and Retention of Affordable Housing Prevention and Elimination of Homelessness
	Funding	HOPWA: \$894,069 ESG: \$427,832 ESG-CV: \$1,475,283 HOPWA-CV: \$130,112
	Description	ESG funds are used to provide services, emergency and transitional housing, and case management resources for the prevention of homelessness. HOPWA funding is allocated to support housing and case management for person with HIV AIDS. Funded activities include, but are not limited to rapid-rehousing, homelessness prevention, emergency shelter, permanent and transitional housing placement, outreach services, services to assist victims of domestic violence and homeless youth, Veterans services, and associated case management. The FY 2020-21 ESG allocation is \$427,832. \$\$1,475,283 in FY 2019 ESG-CV funding has been carried forward. The FY 2020-21 HOPWA allocation is \$894,069. \$130,112 in FY 2019 HOPWA-CV funding has been carried forward. IDIS problem with the funding on this one. Won't let me enter ESG funds, so currently showing zero in the HESG estimated amount column.
	Target Date	6/30/2021

	Estimate the number and type of families that will benefit from the proposed activities	An estimated 1180 households will receive various services to respond to a housing crisis (280 thru ESG, 900 thru ESG-CV), 415 persons will receive TBRA assistance (340 thru HOPWA, 75 thru HOPWA-CV), 1858 persons will access emergency shelter (995 thru ESG, 863 thru ESG-CV), 129 shelter beds will be added (104 thru ESG, 25 thru ESG-CV), 525 individuals will access homelessness prevention services (100 thru ESG, 425 thru ESG-CV), 250 persons with HIV AIDS will receive housing support (200 thru HOPWA, 50 thru HOPWA-CV) and 35 HIV AIDS households will receive case management services thru HOPWA.
	Location Description	City-Wide
	Planned Activities	Rapid-rehousing, services to the homeless, TBRA, STRMU, emergency shelter, homelessness prevention activities, services to domestic violence victims and homeless youth, Veteran services and case management.
11	Project Name	Program Administration and Planning
	Target Area	
	Goals Supported	Administration Planning and Fair Housing
	Needs Addressed	Administration and Fair Housing Activities
	Funding	CDBG: \$1,002,459 HOME: \$1,041,622
	Description	CDBG and HOME funding for Administrative support and program operations. CDBG Administration funds also support Fair Housing Activities. CDBG Administration funds include \$859,459 for program management and operations, \$60,000 for planning activities, and \$83,000 to Metro Alliance for Fair Housing Investigations. HOME administration funding includes \$446,780 carried forward from prior program years and a new FY 2020-21 allocation of \$594,841.25. A temporary HUD waiver has authorized an increase in the FY 2019 and FY 2020 HOME program administration cap from 10% to 25% in response to the COVID-19 pandemic.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 356 persons will be provided with investigative Fair Housing support thru the Metro Alliance with CDBG administration funding. Other associated beneficiary data for CDBG and HOME will be reported under individual project activities.
	Location Description	City-wide
	Planned Activities	CDBG and HOME program administration, CDBG planning support, and Fair Housing investigations.

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 2010-2018 ACS data, The City of Oklahoma City population is estimated at 637,284 persons contained within a land area of over 620 square miles. The community is racially diverse with a total minority population exceeding 32.5%. The minority population in Oklahoma City remains in transition. In the 2018 American Community Survey, persons of Hispanic or Latino origin represent 19.2% of the total population. African American persons, formerly the largest minority/ethnic population in Oklahoma City, now comprise 17.1% 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 expired December 31, 2017. It is unknown if it will be reconstituted 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.

The 2017 Tax Cuts and Jobs Act created new tax incentives for investments made in Opportunity Zones to spur economic development and job creation by encouraging long-term investment in low-income communities nationwide. Opportunity Zones are census tracts that were designated by state officials to be in most need of private investments; Oklahoma City has 8 designated zones within its boundaries. Consistent with HUD’s goals to enhance investment in these zones, the City will give special considerations to qualifying projects located within these areas.

Geographic Distribution

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

Table 59 - 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 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 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.

The Strong Neighborhoods Initiative (SNI) is a concentrated effort by the City to identify and revitalize inner city neighborhoods with a goal of ending decline and restoring them 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 designated SNI neighborhoods all are located within the NRSA boundaries and funding in these neighborhoods is included in the 80% targeting goal.

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) SNI neighborhoods, Capitol View and Capitol Hill were selected during the Third Action Plan Year for participation in the SNI program. Investment in these two new neighborhoods is expected to exponentially increase in the new program year as the planning stage continues to transition towards implementation. Classen North Highlands Park was identified in the Third Action Year as self-sustaining and no longer eligible for SNI support. Work in Classen Ten Penn was completed in the Fourth Action Plan year. The Culbertson's East Highlands neighborhood was completed in the Fifth Action Plan year. A third neighborhood, Metro Park, was selected to participate in the SNI program by the selection committee in March 2020, with Council approval received in April 2020.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The data in the following tables does not include any housing for the homeless; although it should be noted that ESG funds will support the addition of 104 shelter beds, and ESG-CV funds will support the addition of 25 shelter beds. The households listed in the special needs section include HIV/AIDS persons receiving TBRA assistance thru HOPWA and HOPWA-CV funding. The rental assistance activities include households served with short term mortgage and rental assistance thru the CDBG-CV financial assistance program (275), and HOPWA and HOPWA-CV TBRA assistance (250). The production of new units includes 6 units in the Walnut Street Development, 3 units in the Mitchford/Euclid Development, and 7 CHDO homes. Rehab of existing units includes 19 whole house rehabs, 130 emergency repairs, 58 exterior maintenance repairs, and rehab of 10 public housing units. Acquisition of existing units includes 30 DPA buyers.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	703
Special-Needs	250
Total	953

Table 60 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	690
The Production of New Units	16
Rehab of Existing Units	217
Acquisition of Existing Units	30
Total	953

Table 61 - One Year Goals for Affordable Housing by Support Type

Discussion

The City established a short-term assistance program with CDBG-CV funds to assist cost burdened homeowners with subsidies for mortgage or utility payments. Housing assistance is also being provided to the extremely low income households thru ESG funds. However, in response to public comments received at community forums, more expansive TBRA programs are being explored as a potential use of future funds.

The City’s housing rehabilitation program can address substandard conditions with interest-free loans of up to \$42,500 for qualified low-moderate income homeowners. Terms of the interest-free loans are based on the household’s ability to pay. The program has a minimum payment of \$100 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 5-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
- 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.

Projected 2020-2021 Housing Accomplishments:

- Emergency home repairs
- Exterior Maintenance projects
- Whole house rehabilitation projects
- Down Payment Assistance Loans
- CHDO Homes Constructed
- Public Housing Unit Rehabs
- 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 First 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. OCHA is designated as a standard performer.

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

It has been ten (10) years since 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 featured 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 in need of 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 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 the first Action Plan Year to address homelessness include the provision of HOPWA funding for 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.

Addressing the emergency shelter and transitional housing needs of homeless persons

In the First Action Plan Year, ESG funds are 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 consists 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

The City's Coordinated Entry System (CES) directs individuals and families experiencing homelessness to the appropriate services and financial assistance needed to achieve independent living. The CES allows the community to prioritize housing units for the most vulnerable while ensuring the housing is most

appropriate for the individual or family's needs. The CES prioritizes based on vulnerability and length of time homeless, with the goal of decreasing the amount of time individuals and families experience homelessness. 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 First 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 housing units that meet minimum housing quality standards. Households receiving prevention assistance may require supportive services and follow-up care. The case manager is responsible for providing the appropriate supportive services and follow-up care, as determined on a case by case basis. Most prevention assistance will last from one (1) to six (6) months. A standardized housing assessment and housing plan is 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 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 contacts the landlord or utility company immediately 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 works with the household and the Housing Resource Locator to locate and secure more appropriate housing. Program participants must demonstrate the ability to earn sufficient income 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 monthly, or more frequently if determined necessary. Case managers also 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 (3) days and utilize Service Point's network support and technical assistance as needed to ensure proper software usage and data integrity.

Though many outreach and shelter activities are supported by ESG and Continuum of Care funding, most funded activities prioritize housing. Services provided may 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 that may be 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	98
Tenant-based rental assistance	415
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	27
Total	540

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. The City of Oklahoma City continues to encourage and prioritize mixed-income developments in which market rate units may assist in offsetting lower rents on affordable units.

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 First Action Year Plan and other available grant or loan funds are utilized to provide services and activities that benefit 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, with prioritization in areas of low-income concentration. 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, Scissortail Park, Midtown, Plaza District, 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.

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 Inspectors/Risk Assessors for target housing and child-occupied facilities. The housing rehabilitation program manager is also certified as an Abatement Supervisor. 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 will continue to provide prevention , rehousing, case management and other assistance to families and people living with HIV/AIDS as well as other eligible individuals. However, they are only a fraction of the population paying more than a third of their income for housing. Recently, voters approved a new MAPS4 sales tax, 75% of which will provide financial support for social service needs. \$50 million from this revenue source is dedicated to affordable housing and permanent supportive housing and will help leverage another \$400,000 for the same purpose. Additionally, funding from MAPS4 will assist projects addressing domestic violence, mental health, and people exiting incarceration in order to reduce the number of people entering poverty and homelessness.

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 of four Metropolitan Area Projects (MAPS) initiatives to support the construction of public facilities, infrastructure, recreational facilities, and with the most recent initiative social service support for the homeless and domestic violence victims. The total public investment from MAPS funding to date is well over \$2 billion. Projects and services supported with the MAPS initiatives improves the quality of life city-wide and serves as a catalyst to substantial private development. This in itself promotes economic development and provides opportunities for all that may not have otherwise been available. The City also uses bond funds and Tax Increment Funding (TIF) in support of economic development projects that will create jobs or increase property taxes.

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.

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 Community Action Agency (CAA) is funded to conduct an economic development activity with CDBG funds and the Section 108 Loan Guarantee Program. The City's ongoing economic development programs and Section 108 Loan Guarantees generally include the participation of local lenders. Partnering banks include Bank of Oklahoma, Bank of America, BankOne, First State Bank, Legacy Bank, Arvest, Bank 7 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 multiple community partners including OCHA, CAA, NHS, City Care, designated CHDOs, Oklahoma State Department of Commerce, and CEC.

Assisted social service agencies that assist the homeless with shelter, outreach and housing assistance through ESG, HOPWA and City of Oklahoma City general funds are the Homeless Alliance, Heartline 211, Catholic Charities of Oklahoma City, Upward Transitions, the YWCA, Healing Hands Health Care, Legal Aid, Sunbeam Family Services, Sisu Youth, Mental Health Association of Oklahoma, Neighborhood Services Organization, The Center for Employment Opportunities, the Oklahoma City Urban League, Positive Tomorrows, OKC Metro Alliance and Pivot. These organizations also help plan and execute the annual Point In Time count with other government agencies.

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.

The Oklahoma City Continuum of Care has an excellent working relationship with the Oklahoma City Housing Authority and the Oklahoma Housing Finance agency. Both organizations partner with service providers to provide vouchers and public housing for homeless clients of the highest need. Since 2012, the Oklahoma City Housing Authority has dedicated seven (7) vouchers a month for homeless clients served through the Coordinated Entry System of the CoC and have provided additional public housing units for even more.

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). Funding to the down payment assistance (DPA) provider(s) is targeted at 80% (when practicable), and 20% between the NRSA and the remainder of the DPA lending area. The Targeted area generally encompasses the NRSA, CHDO Construction developments 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 designated program boundaries. Targeted areas have been identified both within and outside the general boundaries. Eligible areas may be found in the map attached in Appendix 5.

HOME down payment assistance provides a loan up to \$14,999 based on need that is forgivable at the rate of 1/84th per month over a seven-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, 2020. \$512,445.32 has been received during the Fifth Action Plan year and is available for reallocation. No program income is projected or anticipated in the First Action Plan Year (2020-21). \$1,255,933.65 in 2019 recaptured CDBG funds are available for allocation. CDBG funds capitalized a \$750,000 revolving loan fund (RLF) in 2015 which was later discontinued. One loan closed under this program. Annual RLF program income from this single RLF transaction is projected at \$5,362.32 in the First Action Plan Year. 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 subject to review and approval by The City and compliance with all contractual requirements for use of these funds; 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 may 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.

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. **NOTE: Due to character limits in the HUD software system, additional information regarding the CDBG items below are continued under the HOME Investment Partnerships section immediately following.**

- | | |
|--|---|
| 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 | 0 |
| 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 |

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	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

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 - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. 70.00%

**HOME Investment Partnership Program (HOME)
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. In April 2019 a Substantial Amendment to the Fourth Action Year Plan was approved authorizing a new Section 108 Loan Program to facilitate payment of certain pre-award soft costs for a Section 108 loan to First National Center, subject to HUD approval of final loan documents. No disbursements were made during the 2018-19 or the 2019-2020 program years. **Surplus Funds-** The City of Oklahoma City received a return of \$512,445.32 in 2019-20 CDBG PI prior to the beginning of the First Action Year Plan. Additional CDBG Program Income of \$2,104,737.09 has been projected from the sale of property in Bricktown in 2020-21 for allocation purposes. A total of \$1,255,933.65 in 2019-20 recaptured funding is available for allocation. FY 2019-20 HOME PI and unallocated program funds in the amount of \$456,704 is available for allocation during the First Action Year Plan with an additional 152,080.76 in recaptured funds and \$80,000 in PI (estimated) for FY 2020-21. **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 First Action Year Plan, but it is anticipated that some of the CDBG-CV grant allocation will be used for urgent needs-not to exceed 30% of the total allocation for programs funded with CDBG-CV. **Allocation of CHDO Loan and Grant activities**- CHDO funds may be reallocated and used as either loans or grants for projects. Funds dedicated to CHDO lending may be reallocated 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 Third Action Plan Year of the last Consolidated Plan. The three-year period in the First Action Plan Year will cover the years 2018-19; 2019-20; and 2020-21 (70% of a 3- year average beginning in FY 2018-19 as year one). This First Year Action Plan is year three (3) of the 3- year ratio average.

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 Down Payment Assistance Program (DPA) funded by Oklahoma City will utilize the Recapture Method provided in the HOME Regulations at 24 CFR 92.254(a)(5)(ii). Recapture provisions ensure that the participating jurisdiction recoups all or a portion of the HOME assistance given to a homebuyer if the housing does not continue to be the principal residence of the family for the duration of the period of affordability. If the house is to be sold, the amount subject to recapture will be prorated and dependent on the amount of time the homeowner resided in the home. The City has determined a 7-year affordability period for its DPA program, and DPA is made in the form of a forgivable loan. The affordability period will be documented and secured by a Homebuyer Agreement Deferred Note & Mortgage in favor of The City to be released at the end of the affordability period. If the home is vacated by the owner(s), whether voluntarily or involuntarily, prior to the end of the affordability period without a bona fide sale, all direct assistance provided is due and payable immediately.

The affordability period for any other HOME assistance to the homeowner will be based upon the total funds subject to recapture as described in 24 CFR 92.54(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, will recoup all or a portion of the HOME assistance provided to the homebuyers if the homeowner no longer resides in the house as his or her principal residence. If the house is to be sold, the amount recouped will be prorated and also be subject to the availability of net proceeds. Net proceeds are here defined as the sales price minus superior loan repayment (other than for loans made with HOME funds) and minus any closing costs. 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 on a pro-rata basis per the HOME regulations at 92.254(a)(5)(ii)(A)(2). The pro-rata value

will be calculated based on a monthly occupancy period (i.e., for DPA, prorated at 1/84th per month of occupancy). If the combined DPA and reduction in fair market value is equal to or greater than \$15,000.00 but less than \$40,000.00 then the affordability period will be 10 years or 120 months.

Specifically, when determining the amount to be recaptured, the City will divide the number of months the homeowner has occupied the property by the total months in the affordability period. This number is then multiplied by the total dollar amount of HOME direct assistance originally provided to the homebuyer; the resulting value reflects the dollar amount of assistance that is forgiven. The balance of the funds the homeowner received must be returned to the City- unless there are insufficient net proceeds as defined above. No repayment is required that exceeds the amount of net proceeds.

EXAMPLE:

A homebuyer receives \$10,000 in down payment and closing costs assistance from HOME funds. The affordability period is seven (7) years or 84 months and is secured by a lien filed on the property. If the homebuyer wishes to sell the home after living there for 3 years, 3 months (i.e., 39 months), the homeowner forgiveness is $39 \text{ mo}/84 \text{ mo} \times \$10,000 = \$4,643$. The remaining assistance, $\$10,000 - \$4,643 = \$5,357$, will need to be returned to The City. If the net proceeds in the sale are less than \$5,357, all the net proceeds must be returned to the City.

Additionally, those participating in the DPA program are subject to refinancing restrictions. Requests to subordinate the City's note may be approved only if the refinancing clearly shows significant benefits such as a lower interest rate, shorter term, and provided there is no cash to borrower from equity, and The City remains in the same or better position on the mortgage. The new mortgage shall not have a loan-to-value ratio (LTV) greater than 95% and refinance fees must be reasonable and customary for the OKC market.

All clients receiving DPA must secure a 1st mortgage with a "fixed" interest rate (No Adjustable Rate Mortgages, Interest Only Payment Mortgages, Negative Amortizing Mortgages, Prepayment Penalties, Mandatory Arbitration, or 1st Mortgages with a term greater than 30 years are allowed) and property taxes and hazard insurance must be escrowed (no non-escrowed loans). Transfer of ownership shall be by fee simple title only. All closings must be held locally with the cost to abstract title a seller's expense

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 First Action Plan year to refinance existing debt secured by multifamily housing.

**Emergency Solutions Grant (ESG)
Reference 91.220(I)(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 ensure 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 Board 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 last homeless strategy (a new strategy is under development). While not the definitive measure to count the homeless population; the PIT 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.

In 2016 the Oklahoma City Continuum of Care (CoC) established a Coordinated Entry and Assessment System which meets HUD requirements and has been approved by our local field office. Oklahoma City's Coordinated Entry and Assessment System covers the entire geographic area of Oklahoma City and offers a no-wrong door approach to connecting homeless individuals and families to community resources that will most adequately address their situations. Homeless individuals and families complete a standard assessment survey, VI-SPDAT. Participating programs accept referrals from the system and all individuals and households are prioritized for housing and services based on vulnerability.

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 Board makes recommendations for funding. These recommendations are then 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 CFT 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, 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 been trained to assist people in applying for benefits through Social Security and Medicaid. 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 medically frail and chronically homeless

individuals into permanent housing using a housing first approach. As part of this process, members of the chronically homeless population are administered 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 case manager and service provider are selected and assigned based upon 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 1000 chronically homeless individuals, exceeding their goal by more than 40%.

ESG Policies and Procedures are attached (Appendix 8) in the unique appendices.

HOPWA sponsors are selected using the following process:

The Housing and Community Development Division of the City’s Planning Department publicly posted notification of the availability of FY 2019-20 HOPWA funds. This information was communicated through an email notification to the Coalition to End Poverty (CEP) list serve. The recipients consist of private and public entities not previously selected, including grassroots organizations. This information is also posted on the CEP’s public website and announced at associated CEP and committee meetings. Applications from interested parties are received and reviewed by City of Oklahoma City staff. This review ensures project proposals meet minimum threshold requirements, including consistency with the Five Year Consolidated Plan and the Annual Action Plan. All applications that meet minimum threshold requirements are presented to the Continuum of Care (CoC) Board where each is scored and ranked.

Appendix - Alternate/Local Data Sources

1	Data Source Name 2018 American Community Survey- 1 yr estimates
	List the name of the organization or individual who originated the data set. United States Census Bureau
	Provide a brief summary of the data set. Report number S1101 Households and Families-United States Census Bureau American Community Survey 2018 1-year estimates
	What was the purpose for developing this data set? CHAS data did not populate in IDIS for the Households with Children demographic by household income.
	Provide the year (and optionally month, or month and day) for when the data was collected. 2018

	<p>Briefly describe the methodology for the data collection.</p> <p>Census Survey</p>
	<p>Describe the total population from which the sample was taken.</p> <p>unknown</p>
	<p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>Total estimated households 121,520,180</p>
2	<p>Data Source Name</p> <p>The City of OKC CoC and ESG Service Providers</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>The City of Oklahoma City, Planning Department, Community Development Staff</p>
	<p>Provide a brief summary of the data set.</p> <p>HMIS, CoC and ESG Service provider records and reporting</p>
	<p>What was the purpose for developing this data set?</p> <p>Did not auto populate in the IDIS tables</p>
	<p>Provide the year (and optionally month, or month and day) for when the data was collected.</p> <p>Ongoing data collection. Data reported is current as of February 1, 2020.</p>
	<p>Briefly describe the methodology for the data collection.</p> <p>Various methodologies, client intake and case-management</p>
	<p>Describe the total population from which the sample was taken.</p> <p>City-Wide</p>
	<p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>Homeless households, domestic violence victims, unsheltered youth, and persons' experiencing addiction and mental health challenges.</p>

APPENDIX 1

CONSOLIDATED PLAN TIMELINE

Preliminary Timeline

2019

October-November

Schedule and meet with consultants, governmental organizations, housing agencies, advocates and service providers to discuss barriers, gaps and priority needs

October 15 Confirm and reserve facilities for public meetings in December. Arrange for bi-lingual staff representation if possible.

October 25 **Submit** notice of Public Hearing/Planning input sessions ad to OPUBCO and/or minority and Hispanic news publications

November 5 **Publish** notice of Public Hearing/Planning input session to be held at the following locations (or other times and locations as needed/desired):

Will Rogers Garden Exhibition Center, 3400 NW 36th St, at 6:30 PM on December 11, 2019

Sunbeam Family Services, 1100 NW 14th St, at 3:30 PM on December 12, 2019

Ralph Ellison Library, 2000 NE 23rd St, at 6:30 PM on January 9, 2020

Capitol Hill Library, 327 SW 27th St, at 6:30 PM on January 14, 2020

December 11 Conduct Public Hearing/Planning input session, Will Rogers Garden Exhibition Center, 6:30 PM

December 12 Conduct Public Hearing/Planning input session, Sunbeam Family Services, 3:30 PM

2020

January 9 Conduct Public Hearing/Planning input session, Ralph Ellison Library, 6:30 PM

January 14 Conduct Public Hearing/Planning input session, Capitol Hill Library, 6:30 PM

February 18 Final allocations announced by HUD

March 10 Staff reports due for CCCD meeting

- March 17 **NOTE: The March 17th CCCD Meeting was canceled due to the COVID-19 pandemic. An extension was requested and granted by HUD on March 18th until August 15th for final plan submission. The ConPlan planning process was re-started in late May following amendment of the FY-19 Action Plan and allocation of CDBG-CV, ESG-CV and HOPWA-CV funding.**
- June 9 Citizens Committee for Community Development meeting- Presentation to discuss and approve funding priorities for the 2020-25 Five-Year Consolidated Plan, and the 2020-21 Consolidated Plan First Action Plan Year; and to address any last minute concerns or recommendations for each.
- .June 12 Written and electronic public comments are due to Staff by 5:00 p.m. for inclusion in Council presentation. Additional feedback may be provided on or before the August 4th public hearing for inclusion in the final HUD document.
- June 15 Begin routing process for documents in SIRE. Director Deadline is 7/22 for 8/4 Council Meeting (*must include a near final draft of the plan that will be submitted to HUD*).
- July 13 Combined Notice to be **submitted** to OPUBCO and/or minority and Hispanic news sources for publication (*Combined Notice for 5-day comment period and Notice of Public Hearing at Council on August 4th*)
- July 28 Clerk's office deadline for August 4th City Council meeting.
- July 21 **Publication** of Combined Notice of 5-day comment period and Notice of Public Hearing
- August 4 City Council public hearing and action on the Five-year Consolidated Plan and First Action Plan Year
- Aug 15 Submit 2019-20 Consolidated Plan Fifth Action Year to HUD (*Due to HUD on or before*).

APPENDIX 2

CITIZEN PARTICIPATION COMMENTS

**2020-2025 CONSOLIDATED PLAN
2020-2021 FIRST ANNUAL ACTION YEAR PLAN**

Public Meeting #1 (6:30 p.m. December 11, 2019)

Will Rogers Garden Center

3400 NW 36th St

Oklahoma City, OK 73112

Attendees: **8** (1 community member, 7 staff members)

No Questions or Comments received. Only 1 representative from a local non-profit was present.

2020-2025 CONSOLIDATED PLAN
2020-2021 FIRST ANNUAL ACTION YEAR PLAN

Public Meeting #2 (3:30 p.m. December 12, 2019)
Sunbeam Family Services
1100 NW 14th St
Oklahoma City, OK 73106

Attendees: **29** (21 community members, 8 staff members)

Question: Can these funds be used to pay for utilities?

Staff Response: Yes, that is a potential use that we have been requested to consider; however, such a program would be a Public Services under CDBG, and there is more need and requests for these funds than are available due to the statutory funding cap for such programs. Funding under HOME is a possibility, but there are administrative and regulatory hurdles to consider in designing a program. Some ESG and HOPWA funds are used for utility assistance, but those funds are limited and for specified uses.

Question: What is the HUD definition of “Senior”?

Staff Response: HUD defines senior citizens as those age 62 or above.

Question: How much money has been invested in the Capitol View SNI neighborhood to date?

Staff Response: In Capitol View, \$374,000 has been disbursed so far; however, there are several large disbursements pending for hazardous tree removals and community park projects. An additional \$800,000 has been expended from non-City sources.

In the Capitol Hill neighborhood, there has been \$77,000 disbursed to date plus an additional \$1.2 million in private investment.

In Culbertson’s East Highland, one of the original SNI neighborhoods established in 2013, \$4.3 million of federal funds have been invested to date, plus an additional \$5.3 million in non-City dollars.

Question: Is the Jefferson Park CHDO currently building in the Culbertson’s East Highland neighborhood?

Staff Response. Not at the present time.

Question: A representative of a local non-profit for a community Czech Hall expressed interest in using CDBG funds to support a mobile marionette theater to serve local elementary schools.

Staff Response: This could potentially be eligible under CDBG, but we would have to look closely at the specific details to see if it can meet a national objective and eligible activity. If eligible, it likely would be

a public services activity (where limited funds are available). Alternative funding sources such as an Arts grant or private funding may be more appropriate in this particular case.

Question: What is the \$10 million “GOLT” mentioned in the presentation for affordable housing?

Staff Response: The GOLT (General Obligation Limited Tax) bond was approved as part of the 2017 General Obligation Bond Authorization which approved \$60 million for Economic and Community Development projects, of which \$10 million of these funds is earmarked for affordable housing development. The program goal is to provide approximately \$1 million annually to qualified projects to serve families at or below the 80% Area Median Income level. This funding source is relatively new and only one project has been supported to date. It is bond money and unrelated to the federal funding grants.

Question: What is the status on the Lead Based Paint Grant with the Oklahoma State Department of Health? There seem to be multiple sources of funding for information and awareness campaigns related to lead based paint, but very few sources for actual abatement.

Staff Response: The City was approved for the funding; however, we are still in the process of grant negotiation and the program guidelines are rigorous and administratively difficult. It is unknown at the present time if we will be able to construct a viable program for implementation that meets all the requirements. Discussions are on-going.

Question: Has there been any consideration in the upcoming 5 year plan to leveraging federal funds with the recently passed MAPS 4 funding which was allocated for affordable housing and certain social services projects?

Staff Response: It’s not yet known which programs will be funded first from the MAPS allocation or when those funds will be available (MAPs does not incur debt, so funds must be collected before the projects begin). As such, we don’t envision them being included in this 5 year plan. The unknown details of the MAPs projects may ultimately affect whether grant dollars are allowed to be used. With that said, leveraging federal funds with other dollars is always a priority for proposals supported with CDBG and/or HOME funds and it may ultimately make sense to support some of the MAPs projects that impact common goals.

Question: In reference to Downpayment Assistance provided with HOME funds, what can be done to prevent flipping properties, and subsequently losing the home as an affordable unit to a market rate buyer?

Staff Response: Staff appreciates the concern. It was noted in the discussion that assisted homebuyers should be allowed to earn some return on their investment like other families; a commenter noted the only way to ensure long term affordability would be a community land trust or deed restrictions. There is a provision in the HOME Final Rule that allows deed restrictions, but this would require ongoing staff support throughout the affordability period. Staff will further review this issue to determine potential options.

Question: Could the minimum affordability period on HOME assisted units be extended from 5 to 7 years to promote neighborhood stability?

Staff Response: (Note the comment was interpreted from context as relating specifically to the DPA assistance program.) The minimum HUD requirement based on the DPA investment is 5 years. A longer affordability period is allowed under the Final Rule at the participating jurisdiction's discretion. Staff will review this issue to determine feasibility and consequences of imposing a longer affordability period.

2020-2025 CONSOLIDATED PLAN 2020-21 FIRST ANNUAL ACTION YEAR PLAN

Public Meeting #3 (6:30 p.m. January 9, 2020)

Ralph Ellison Library
2000 NE 23rd St
Oklahoma City, OK 73111

Attendees: **28** (20 community members, 8 staff members)

Question: What efforts have been made by the City to distribute, or otherwise notify people in the community about the availability of the current affordable housing survey?

Staff Response: The City has been working with selected focus groups to provide input to the survey administrator. A survey was mailed to 10,000 random households, accompanied by a letter from the Mayor. Various notices have been published in the newspaper notifying people that it is available online to all city residents. A link to the survey is available on the City website. We have been sending notifications to people on a variety of e-mail lists, and posted on several social media accounts. Viewers are encouraged to share this information with anyone who may be interested in participating.

Question: How are the grant funds used to provide assistance for the homeless?

Staff Response: Of the entitlement funds, our primary funding source to assist with the homeless population is ESG funds. In addition, we receive Continuum of Care (CoC) funding which is a competitive grant from HUD which serves persons who are homeless. The City is the lead entity of the Continuum of Care, whose Board makes recommendations for funding to partnering social service organizations. The issue of homelessness is a current priority. This year the Mayor established a Task Force on Homelessness and the City hired a consultant to identify our greatest needs and formulate a strategy for addressing persons with homelessness. We will be conducting our annual Point in Time (PIT) count on January 23rd which provides a snapshot of the homeless population. Data from the PIT survey is used to track increases/decreases in homelessness, and to identify demographic trends of those who are currently unhoused.

Follow-up Question: Are funds that are allocated for homeless assistance distributed to different types of organizations based on certain types of individuals such as those with traumatic brain injury, physical disabilities, mental illness, etc.? Those with TBI are a special need population and often have no options to homelessness.

Staff Response: There are no set-asides or allocation standards for organizations based solely on the contributing factors. The CoC awards grants through an application process and non-profit partners are supported in their efforts based on a proposed activity, and a contractual

agreement with quantifiable measurables. Funds are used to support persons who are homeless regardless of the reasons.

Follow-up Question: How can the public get involved to help with the homelessness problem?

Staff Response: You may contact our Social Services Staff, Jerod Shadid or Stacy Tarpley. We also staff the Coalition to End Poverty which meets once a month at NorthCare, formerly at the Homeless Alliance. The public is welcome to attend these meetings. Your City Council person is also available if there are specific issues they need to be aware of. The United Way 211 number is also a good resource to identify services when there is an immediate crisis.

Question: What exactly are the Community Development (CD) and Economic Development (ED) activities?

Staff Response: There are a variety of activities categorized as 'community development'. These are generally activities that promote the wellbeing of the community and can be neighborhood revitalization, where our efforts are specifically focused in SNI neighborhoods and within the Neighborhood Revitalization Strategy Area (NRSA). They may also be public works projects, such as streets and parks, or providing non-profit support- such activities funded in the past include the Kiwanis Head Start program, an adult day care facility, an AIDS support program at the Winds House, housing support to FirstStep, and public service funds to Healing Hands which provides healthcare services to the homeless. We also fund the COTPA transportation program which provides free and discounted bus and taxi fares for seniors and special populations. A small portion of funding is used for abandoned housing board-ups and graffiti removal. A large portion of community development funds are used to support our housing rehab programs, including emergency repairs and home exterior maintenance.

ED activities are more specialized. A small allocation is made to Community Action Agency to support small business training. We also use the Section 108 program to support large capital projects such as the Skirvin, First National Center, Dell, the 21C hotel and Embassy Suites. Section 108 funds are not allocated from entitlement money; however, our CDBG allocation is used as collateral and these funds would need to be used to pay the loans in the event of a default. In some cases, ED loan programs can be funded from grants which generally would be in support of job creation for low to moderate income persons.

Question: What is the income eligibility requirement for the rehab programs?

Staff Response: 80% of the Area Median Income, which is currently \$59,050 for a family of four. A lower threshold of 60% AMI is used for the senior loans which are forgivable loans.

Question: What resources are available for previously incarcerated individuals who are being released and need to find housing?

Staff Response: ESG has a new program which uses a coordinated entry system that connects previously incarcerated participants with case management through Catholic Charities. This can be challenging, especially for sexual offenders who are geographically restricted from residing near schools and similar neighborhood institutions.

Question: Why was Positively Paseo selected as the CHDO developer in Capitol View?

Staff Response: The City currently partners with 3 CHDO's; Jefferson Park, Paseo (National Housing Services Redevelopment Corporation), and Neighborhood Housing Services (NHS). The CHDOs work in a variety of areas, but we encourage them to develop housing in one of our Strong Neighborhood Initiative areas. Any of the CHDOs may work in Capitol View. Paseo is a successful organization that no longer works in the Paseo area and has expanded to other locations.

Follow-up Question: Who can builders contact if they are interested in becoming a CHDO?

Staff Response: Historically, there were more CHDOs when HOME funding was higher. Presently funding is not sufficient to support more CHDOs. Teresa Smith in the Planning Department is the City's contact person for the CHDO program.

**2020-2025 CONSOLIDATED PLAN
2020-2021 FIRST ANNUAL ACTION YEAR PLAN**

Public Meeting #4 (6:30 p.m. January 14, 2020)

Capitol Hill Library

327 SW 27th St

Oklahoma City, OK 73109

Attendees: **16** (7 community members, 9 staff members)

No Questions or Comments were received. Public participants included representatives from the State of Oklahoma DHS, USDA, Upward Transitions, Economic Planning Systems, and Community Action Agency.

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

FY 2020-2021

Objective:

AFFORDABLE HOUSING CONSTRUCTION AND DEVELOPMENT

<i>Affordable Housing Development Program</i>	
HOME-Affordable Housing Development Program (AHDP) Euclid Properties	3
HOME-CHDO Homes	2
CDBG-Walnut Street LLC Project	6

RETENTION AND REHABILITATION OF AFFORDABLE HOUSING

<i>Affordable Housing Rehab and Retention</i>	
CDBG-Housing Exterior Maintenance Program (HEMP)	58
CDBG-Emergency Repair	130
CDBG- OCHA Inspection Program	0
CDBG- OCHA Public Housing Modernizations	10
HOME- Housing Assistance Program (HAP) Whole House Rehabs	19
CDBG-CV-Short Term Mortgage/Rent/Utilities Assistance	275
HOPWA-Tenant Based Rental Assistance (TBRA)	415
HOPWA- Short Term Mortgage, Rent, and Utility Assistance Payments (STRMU)	250

HOMEBUYER FINANCIAL ASSISTANCE

<i>Homebuyer Financial Assistance</i>	
HOME-Homebuyer Down Payment Assistance Program (DPA)	30

ELIMINATION OF SLUM AND BLIGHT

<i>Slum and Blight Remediation Programs</i>	
CDBG-OCURA Urban Renewal Completions	3
CDBG-Abandoned Housing Program-Code Enforcement	150

PUBLIC SERVICES

<i>Public Service Activities</i>	
CDBG-Youth Services-STEAM (SNI)	400
CDBG-Hazardous Tree Removal (SNI)	50
CDBG- Neighborhood-led Projects (SNI)	3
CDBG- Transportation Services-COTPA (CD)	40,400
CDBG-Graffiti Removal (CD)	200
CDBG-Community Health Services (CD)	450
CDBG- Legal Assistance to prevent foreclosures and evictions	100

CDBG-Foster Care Youth Advocacy (CD)	15
CDBG- Unprogrammed PS Activities	TBD

PUBLIC FACILITIES

<i>Public Facilities and Infrastructure</i>	
CDBG-Capitol Hill Sidewalks (SNI)	1930 LF
CDBG-SNI Parks Project (SNI)	874
CDBG-SNI Tree Plantings (SNI)	50
CDBG Public Facilities Program-Open Solicitation (CD)	TBD

ECONOMIC DEVELOPMENT AND OPPORTUNITY

<i>Economic Development Programs</i>	
CDBG-CAA Small Business Training Assistance Program	175
CDBG-CV-Support for Non-Profits	50
CDBG-OCURA Microenterprise Program	40

HOMELESSNESS PREVENTION

<i>Homeless Programs and Services</i>	
HOPWA- Assistance to Persons with HIV/AIDS (TBRA/STRMU reported in hsg. above)	350
ESG-Homelessness Prevention	525
ESG-Shelter (individuals served)	1858
ESG-Shelter (beds provided)	129
ESG-Public Services to the homeless	1180
HOPWA-Supportive services and Case Management	35

ADMINISTRATION, PLANNING AND FAIR HOUSING

<i>Program Administration and Planning</i>	
CDBG- Fair Housing Compliant Investigation	356

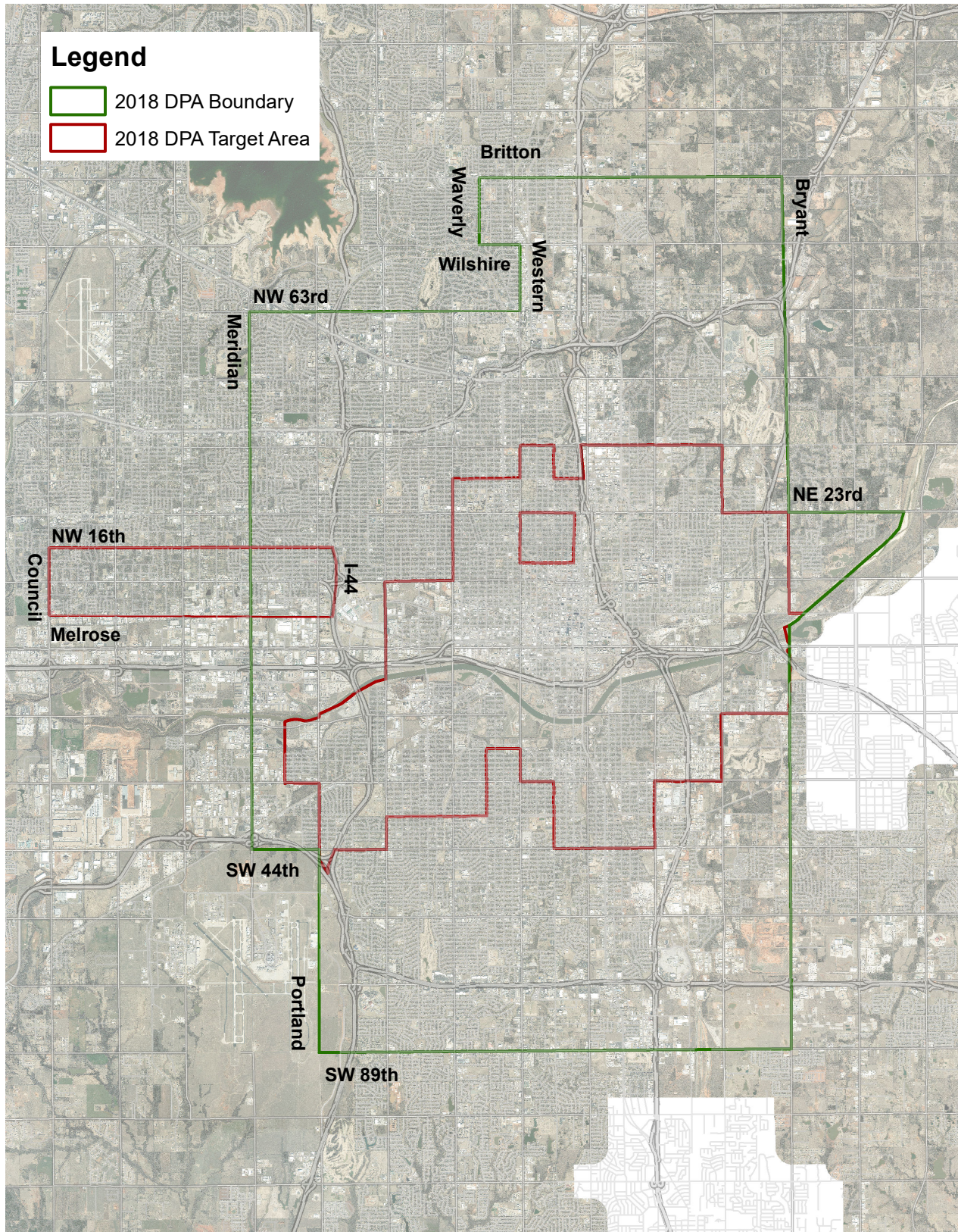
APPENDIX 5

DOWNPAYMENT ASSISTANCE PROGRAM

BOUNDARIES

OKLAHOMA CITY DOWN PAYMENT ASSISTANCE PROGRAM GUIDELINES

EXHIBIT 1



APPENDIX 6

SF-424 AND CERTIFICATIONS (COPIES)

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 type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> 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 Street	
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: Mr.	* First Name: Chris
Middle Name: _____	
* Last Name: Varga	
Suffix: _____	
Title: Community Development Manager	
Organizational Affiliation: The City of Oklahoma City	
* Telephone Number: (405) 297-1639	Fax Number: (405) 297-3796
* Email: christopher.varga@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:

14.218

CFDA Title:

PY20 Oklahoma City Community Development Block Grant (CDBG)

*** 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="5,012,294.00"/>
* 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="5,012,294.00"/>

*** 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: 02/28/2022

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	August 4, 2020

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 type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> 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 Street	_____
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: Mr.	* First Name: Chris
Middle Name: _____	_____
* Last Name: Varga	_____
Suffix: _____	_____
Title: Community Development Manager	
Organizational Affiliation: The City of Oklahoma City	
* Telephone Number: (405) 297-1639	Fax Number: (405) 297-3796
* Email: christopher.varga@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:

PY20 Oklahoma City HOME Investment Partnerships Grant (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: 03-05

* b. Program/Project: [Redacted]

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

[Redacted]

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date: 07/01/2020

* b. End Date: 06/30/2021

18. Estimated Funding (\$):

* a. Federal	2,379,365.00
* b. Applicant	[Redacted]
* c. State	[Redacted]
* d. Local	[Redacted]
* e. Other	[Redacted]
* f. Program Income	[Redacted]
* g. TOTAL	2,379,365.00

*** 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 [Redacted]
- 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

[Redacted]

Add Attachment

Delete Attachment

View Attachment

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

** I AGREE

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

Authorized Representative:

Prefix: Mr. * First Name: David
Middle Name: [Redacted]
* Last Name: Holt
Suffix: [Redacted]

* Title: Mayor

* Telephone Number: (405) 297-2424 Fax Number: [Redacted]

* Email: mayor@okc.gov

* Signature of Authorized Representative: David Holt

* Date Signed: 8-4-2020

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

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 August 4, 2020

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 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 Street"/>
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" value="Mr."/>	* First Name: <input type="text" value="Chris"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Varga"/>	
Suffix: <input type="text"/>	
Title: <input type="text" value="Community Development Manager"/>	
Organizational Affiliation: <input type="text" value="The City of Oklahoma City"/>	
* Telephone Number: <input type="text" value="(405) 297-1639"/>	Fax Number: <input type="text" value="(405) 297-3796"/>
* Email: <input type="text" value="christopher.varga@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:

PY20 Oklahoma City Emergency Solutions Grant (ESG)

*** 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 Grant (ESG) 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="427,832.00"/>
* 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="427,832.00"/>

*** 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: 02/28/2022

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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19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
The City of Oklahoma City	August 4, 2020

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 type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> 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 Street	
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: Mr.	* First Name: Chris
Middle Name: _____	
* Last Name: Varga	
Suffix: _____	
Title: Community Development Manager	
Organizational Affiliation: The City of Oklahoma City	
* Telephone Number: (405) 297-1639	Fax Number: (405) 297-3796
* Email: christopher.varga@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:

PY20 Oklahoma City Housing Opportunities for Persons With AIDS grant (HOPWA)

*** 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) 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="894,069.00"/>
* 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="894,069.00"/>

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

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** I AGREE

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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: 02/28/2022

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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.
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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.
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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
	<input type="text" value="Mayor"/>
APPLICANT ORGANIZATION	DATE SUBMITTED
<input type="text" value="The City of Oklahoma City"/>	<input type="text" value="August 4, 2020"/>

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

8-4-2020
Date

Mayor

Title

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 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) 2019, 2020, and 2021 [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.

David Holt

Signature of Authorized Official

8-4-2020

Date

Mayor

Title

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

8-4-2020

Date

Mayor

Title

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;

David Holt

Signature of Authorized Official

8-4-2020

Date

Mayor

Title

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

8-4-2020

Date

Mayor

Title

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.

David Holt

Signature of Authorized Official

8-4-2020

Date

Mayor

Title

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



MEMORANDUM

Council Agenda
Item No. IX.J.1&2.
8/4/2020

The City of OKLAHOMA CITY

PUBLIC HEARING HELD.

TO: Mayor and City Council

FROM: Craig Freeman, City Manager

1. Public hearing.
2. Resolution approving the Fiscal Year 2020-24 Five Year Consolidated Plan and Fiscal Year 2020-21 First Action Year Plan, and approving new formula grant funding allocations for the Community Development Block Grant \$5,012,294; The HOME Investment Partnerships Program \$2,379,365; Emergency Solutions Grant Program \$427,832; The Housing Opportunities For Persons With AIDS \$894,069; and providing for allocation of 2019-20 Community Development Block Grant Program Income and estimated program funds that will be recaptured from prior year of approximately \$4,580,698; HOME Investment Partnerships Program 2019-20 unallocated program funds, Program Income and recaptured program funds in the amount of \$608,784.76, and estimated 2020-21 Program Income of \$80,000; approving application documents and certifications, U.S. Department of Housing and Urban Development grant agreements and operating agreements with sub-grantees, including the Community Action Agency, Community Health Services, Inc., Oklahoma City Urban Renewal Authority, Oklahoma City Housing Authority, Metropolitan Fair Housing Council, Central Oklahoma Transportation and Parking Authority, Court Appointed Special Advocate of Oklahoma County, Inc., and the Oklahoma City Housing Services Redevelopment Corporation and Jefferson Park Neighbors Association operating under a Joint Venture Agreement; 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.

Purpose The first action for this Council item, the public hearing, affords citizens an opportunity to comment on the Plan before the Council takes action. The Resolution approving the Five Year Consolidated Plan and First Action Year Plan provides for the allocation of grant funds to meet the priorities of the Consolidated Plan for FY 2020-24 and serves as the application for the four (4) formula grant programs administered by the U.S. Department of Housing and Urban Development (HUD).

Background The Consolidated Plan is a document required by the U.S. Department of Housing and Urban Development (HUD) as a pre-requisite for receiving federal formula grant funds. The Consolidated Plan provides a framework for establishing objectives and assigning priorities for addressing housing and community development needs. The Plan is implemented in five (5) annual Action Year Plans that provide for the allocation of grant funds awarded by HUD for eligible activities during a program year. The Action Year budget follows the assessment of housing needs, non-homeless special needs, and non-housing

community development needs identified in the Five-Year Consolidated Plan; and allocates resources to priorities based on the availability of funds.

Development of the proposed FY 2020-24 Consolidated Plan and FY 2020-21 First Action Year Plan was initiated by the Planning Department by convening four (4) public meetings in December 2019 and January 2020 to solicit citizen input on housing and community development needs. The Citizen's Committee for Community Development ("Citizens Committee") convened an additional public meeting on June 9, 2020, at which time Community Development Staff discussed the proposed Consolidated Plan strategies and objectives, programs, and funding levels for the First Action Year Plan. The Citizen's Committee approved the funding recommendations and strategic priorities for both Plans and endorsed the item for presentation to City Council for final approval.

To comply with programmatic public participation requirements, a 5-day comment period was initiated by a publication in The Oklahoman on July 21, 2020. Once adopted by City Council, the final plan must be submitted to the HUD Regional Office on or before August 15, 2020, unless otherwise extended by HUD. Recommended funding allocations for the CDBG and HOME programs appear in Attachment "A" of the Resolution. ESG and HOPWA funds will be allocated through the Continuum of Care Committee based on a Request for Proposal (RFP) process; the Committee's funding recommendations will be forwarded to City Council for final approval.

FY 2019-20 CDBG-CV funds in the amount of \$2,948,568, ESG-CV funds in the amount of \$1,475,283 and HOPWA-CV funds in the amount of \$130,112 were awarded to The City in April 2020 to address urgent community needs precipitated by the COVID-19 pandemic. Due to the late receipt of these funds in the FY 2019-20 year, these funds are being carried forward to FY 2020-21. It is anticipated that the CV funds will be expended quickly. The use of these funds is described within the Consolidated Plan and included in the available resources tables. The proposed use of CV funds will not change from the proposed expenditures previously approved by City Council.

The Resolution also provides authorization for the Mayor to sign the HUD Release of Funds (ROF) forms on an ongoing basis throughout the year. A ROF must be completed prior to any expenditure of funds for a HUD-assisted project but is not a City commitment or guarantee for use of HUD funding. Rather, submission is required as part of an administrative process (defined in 24 CFR Part 58) to determine environmental impact of a potential HUD-assisted project. The ROF process should be completed prior to any Council action to allocate or contract for the use of HUD funds. The Resolution provides authorization for Housing and Community Development staff assigned environmental review responsibilities to sign applicable determinations and statutory checklists for exempt and categorically excluded activities under 24 CFR part 58, which do not require a Release of Funds.

The allocation of formula grant funds to program activities will be paid through the individual grants for which an application is authorized in the Resolution. The funds will be set up in the new fiscal year categories when the grant agreements are approved and returned to The City by HUD.

Source of Funds GRANTS MANAGEMENT– DEPT OF HSG & URB DEVEL-RSTR
-CDBG ENTITLEMENT – B-20-MC-40-0003 (019-6140-2408000-G80335)
GRANTS MANAGEMENT– DEPT OF HSG & URB DEVEL-RSTR
-HOME – M-20-MC-40-0203 (019-6140-2408030-G803336)
GRANTS MANAGEMENT– DEPT OF HSG & URB DEVEL-RSTR
-EMERGENCY SHELTER – E-20-MC-40-0003 (019-6140-2408010-G80337)
GRANTS MANAGEMENT– DEPT OF HSG & URB DEVEL-RSTR
-HOPWA – OK-H-20-F0001 (019-6140-2408035-G80338)

Review Planning Department

Recommendation: Public hearing be held and Resolution be adopted.

RESOLUTION

RESOLUTION APPROVING THE FISCAL YEAR 2020-24 CONSOLIDATED PLAN AND FISCAL YEAR 2020-21 FIRST ACTION YEAR PLAN, AND APPROVING NEW FORMULA GRANT FUNDING ALLOCATIONS FOR THE COMMUNITY DEVELOPMENT BLOCK GRANT \$5,012,294; THE HOME INVESTMENT PARTNERSHIPS PROGRAM \$2,379,365; EMERGENCY SOLUTIONS GRANT PROGRAM \$427,832; THE HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS \$894,069; AND PROVIDING FOR THE ALLOCATION OF 2019-20 COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM INCOME AND ESTIMATED PROGRAM FUNDS THAT WILL BE RECAPTURED FROM PRIOR YEAR OF APPROXIMATELY \$4,580,698, HOME INVESTMENT PARTNERSHIPS PROGRAM 2019-20 UNALLOCATED PROGRAM FUNDS, AND PROGRAM INCOME AND RECAPTURED PROGRAM FUNDS IN THE AMOUNT OF \$608,784.76; AND ESTIMATED 2020-21 PROGRAM INCOME OF \$80,000; 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", OF THE RESOLUTION, INCLUDING THE COMMUNITY ACTION AGENCY, COMMUNITY HEALTH SERVICES, INC., OKLAHOMA CITY URBAN RENEWAL AUTHORITY, OKLAHOMA CITY HOUSING AUTHORITY, METROPOLITAN FAIR HOUSING COUNCIL, CENTRAL OKLAHOMA TRANSPORTATION AND PARKING AUTHORITY, COURT APPOINTED SPECIAL ADVOCATE (CASA) OF OKLAHOMA COUNTY, INC., AND THE OKLAHOMA CITY HOUSING SERVICES REDEVELOPMENT CORPORATION AND JEFFERSON PARK NEIGHBORS ASSOCIATION OPERATING UNDER A JOINT VENTURE AGREEMENT; 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 including the use of subgrants to partner agencies; 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 2020-21 will be the third year of a three-year averaging period to achieve the requirement to spend 70% of CDBG funds to benefit low/moderate income persons in the NRSA area; and

WHEREAS, the final FY 2020-21 formula grant allocations from HUD, have been announced and required federal public participation requirements have been adhered to;

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

1. The proposed Fiscal Year 2020-24 Five-Year Consolidated Plan is adopted for the period July 1, 2020 through June 30, 2025.
2. The proposed Fiscal Year 2020-21 Consolidated Plan First Action Year Plan is adopted for the period July 1, 2020 through June 30, 2021.
3. The allocations of funds for the CDBG, HOME, ESG, and HOPWA programs, program income, and recaptured funds from prior years attached hereto and reflected in the First Action Year Plan are approved.
4. The Mayor is authorized to execute the application documents, to make the required certifications, and to execute the HUD grant agreements.
5. 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, Court Appointed Special Advocate of Oklahoma County, Inc., and the Oklahoma City Housing Services Redevelopment Corporation and Jefferson Park Neighbors Association operating under a Joint Venture Agreement.
6. The Mayor is authorized to sign HUD Form 7015.15 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.
7. The Mayor and/or his designee, the Planning Department, Housing and Community Development Manager or management staff overseeing environmental reviews are authorized to sign all applicable Environmental Review determinations and statutory checklists for ‘exempt’, ‘categorically excluded not subject to’, and ‘categorically excluded subject to’ activities under 24 CFR Part 58 which do not require HUD Form 7015.15 Request for Release of Funds during the program year.
8. The Mayor and/or his designee, the Housing and 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

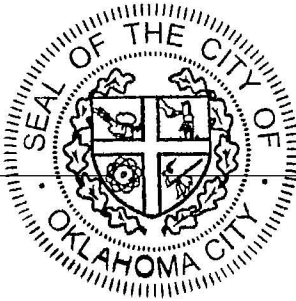
PROVIDED that the Mayor will not sign any agreement or contract pursuant to such awards that is not herein authorized without first securing the specific approval of the City Council.

ADOPTED by the Council and **APPROVED** by the Mayor of The City of Oklahoma City this 4TH day of August, 2020.

ATTEST: [SEAL]



CITY CLERK





MAYOR

REVIEWED FOR FORM AND LEGALITY



ASSISTANT MUNICIPAL COUNSELOR

**ATTACHMENT “A”
FUNDING RECOMMENDATIONS**

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)

Sources of Funds

Community Development Block Grant 2020-21	\$5,012,294
2019-20 Recaptured and Reprogrammed Funds and Program Income	\$4,580,698

Total Sources of CDBG Funds **\$9,592,992**

HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME)

Sources of Funds

Home Investment Partnerships Program 2020-21	\$2,379,365
2019-20 Recaptured and Reprogrammed funds	\$608,785
Estimated Program Income	\$80,000

Total Sources of HOME Funds **\$3,068,150**

EMERGENCY SOLUTIONS GRANT PROGRAM (ESG)

ESG funds allocated for 2020-21 **427,832**

HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS (HOPWA)

HOPWA funds allocated for 2020-21 **\$894,069**

APPLICATIONS OF FUNDS – FY 2020-21 ALLOCATIONS

CDBG:

Decent Housing

Oklahoma City Housing Assistance Program (to include the listed activities): \$1,300,000

- Housing Exterior Maintenance Project Activity
- Program Delivery Activity
- OCHA-Inspection Program-Housing Service \$50,000

Oklahoma City Housing Authority (OCHA) \$235,000

Community Action Agency (CAA) Emergency Home Repair \$454,323

Slum and Blight Remediation

Urban Renewal Authority Completions \$788,880

OKC Abandoned Housing-Spot Blight	\$70,000
Public Service Activities	
Strong Neighborhoods Initiative-PS	\$625,000
COTPA (Embank) Share-A-Fare	\$105,000
Community Action Agency Graffiti Removal	\$10,000
Community Health Services, Inc.-Healing Hands	\$60,000
Court Appointed Special Advocates for Children (CASA)	\$30,000
General Public Services-Unprogrammed	\$583,063
Public Facilities Activities	
Strong Neighborhoods Initiative-PF	\$800,000
Walnut Street Project LLC-Infrastructure	\$335,000
Community Development Program-PF (RFP)	\$1,000,000
Economic Opportunity	
CAA Small Business	\$40,000
Administration	
Metropolitan Fair Housing Council	\$83,000
Planning	\$60,000
Administration	\$859,459
Unprogrammed Funds	\$2,104,737
TOTAL ALLOCATION OF CDBG FUNDS	\$9,592,992

PRIOR YEAR CDBG PROJECTS/ACTIVITIES TO BE CARRIED FORWARD TO 2020-21 ALONG WITH ANY REMAINING FUNDS:

Community Action Agency Emergency Home Repair (*up to \$145,677 carried forward*)
 OCURA Program Income funds from FY17-18 and FY18-19 (*not to exceed \$307,990*)
 OCURA Urban Renewal Completions, Slum/Blight/Remediation
 OKC Abandoned Housing Program-Spot Blight
 OCHA Inspection Program
 General Public Services-Legal Assistance
 CDBG-CV Short Term Housing and Utility Assistance Program
 CDBG-CV Non-Profit Support Program
 Community Development Public Facilities Program -Unallocated (*Open RFP*)
 Community Development Public Facilities Program-First Step (SRO) OKC Metro Alliance
 Community Development Public Facilities Program-City Care project
 Walnut Street LLC Project-Acquisition
 Section 108 Loan Repayment Contingency
 OCURA Microenterprise Program

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

Oklahoma City Housing Assistance Program:

- Exterior Maintenance Project Activity
- Program Delivery Activity
- OCHA Public Housing Modernization Program

Community Action Agency Graffiti Removal
 COTPA Share-A-Fare Program
 SNI-Public Service Activities

Metropolitan Fair Housing Council
 Planning
 Administration

HOME:

Down Payment Assistance Program (80% targeted to NRSA/20% non-targeted)	\$500,000
Oklahoma City Housing Assistance Program (40% targeted to SNI)	\$170,000
Affordable Housing Development Program	\$1,232,636
Community Housing Development Organization (CHDO) Set-aside	\$356,905

Unallocated CHDO Funds	\$152,081
Planning and Administration	\$594,841
TOTAL ALLOCATION OF HOME FUNDS	\$3,006,463

PRIOR YEAR HOME PROJECTS/ACTIVITIES TO BE CARRIED FORWARD TO 2020-21 ALONG WITH ANY REMAINING FUNDS

Community Housing Development Organization Set-asides
Community Housing Development Organization Unprogrammed and Unexpended funds
Down Payment Assistance Program
Affordable Housing Development Program

- Uncommitted funds
- OKC Metro Alliance First Step SRO Project Activity
- OCURA Mitchford/Euclid Project

Oklahoma City Housing Assistance Program (*Up to \$830,000 carried forward, with remainder recaptured for future allocation*)
Administration

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

- Oklahoma City Housing Assistance Program (*unexpended funds in excess of \$830,000*)
 - Affordable Housing Development Program-OKC Housing Services Redevelopment Corporation activity
 - Jefferson Park and NHS CHDO activities-unexpended balances*
- *Jefferson Park CHDO unexpended balance does not include the Walnut Street Project pre-development loan or other CHDO funds.

EMERGENCY SOLUTIONS GRANT (ESG): \$427,832

ESG funds are awarded through an Open Solicitation process. The Continuum of Care Committee will review proposals and make recommendations for funding which will be 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.

HOUSING OPPORTUNITIES FOR PERSONS WITH HIV/AIDS (HOPWA): \$894,069

HOPWA funds are awarded through an Open Solicitation process. The Continuum of Care Committee will review proposals and make recommendations for funding which will be presented to 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.

Program Income

Program income for the 2020-21 First 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 2020-21 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 that is deposited to the City's letter of credit, and that creates additional administrative capacity, may be used by the City for HOME administrative expenses incurred during the Action Year, and excess administrative capacity may be carried forward to subsequent years.
6. Unallocated CHDO funds may be used as loan funds available to CHDOs or reallocated to CHDO set-aside activities as needed to ensure timely allocation and efficient use of these resources in the production of affordable units.

RESOLUTION

RESOLUTION APPROVING THE FISCAL YEAR 2020-24 CONSOLIDATED PLAN AND FISCAL YEAR 2020-21 FIRST ACTION YEAR PLAN, AND APPROVING NEW FORMULA GRANT FUNDING ALLOCATIONS FOR THE COMMUNITY DEVELOPMENT BLOCK GRANT \$5,012,294; THE HOME INVESTMENT PARTNERSHIPS PROGRAM \$2,379,365; EMERGENCY SOLUTIONS GRANT PROGRAM \$427,832; THE HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS \$894,069; AND PROVIDING FOR THE ALLOCATION OF 2019-20 COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM INCOME AND ESTIMATED PROGRAM FUNDS THAT WILL BE RECAPTURED FROM PRIOR YEAR OF APPROXIMATELY \$4,580,698, HOME INVESTMENT PARTNERSHIPS PROGRAM 2019-20 UNALLOCATED PROGRAM FUNDS, AND PROGRAM INCOME AND RECAPTURED PROGRAM FUNDS IN THE AMOUNT OF \$608,784.76; AND ESTIMATED 2020-21 PROGRAM INCOME OF \$80,000; 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", OF THE RESOLUTION, INCLUDING THE COMMUNITY ACTION AGENCY, COMMUNITY HEALTH SERVICES, INC., OKLAHOMA CITY URBAN RENEWAL AUTHORITY, OKLAHOMA CITY HOUSING AUTHORITY, METROPOLITAN FAIR HOUSING COUNCIL, CENTRAL OKLAHOMA TRANSPORTATION AND PARKING AUTHORITY, COURT APPOINTED SPECIAL ADVOCATE (CASA) OF OKLAHOMA COUNTY, INC., AND THE OKLAHOMA CITY HOUSING SERVICES REDEVELOPMENT CORPORATION AND JEFFERSON PARK NEIGHBORS ASSOCIATION OPERATING UNDER A JOINT VENTURE AGREEMENT; 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 including the use of subgrants to partner agencies; 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 2020-21 will be the third year of a three-year averaging period to achieve the requirement to spend 70% of CDBG funds to benefit low/moderate income persons in the NRSA area; and

WHEREAS, the final FY 2020-21 formula grant allocations from HUD, have been announced and required federal public participation requirements have been adhered to;

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

1. The proposed Fiscal Year 2020-24 Five-Year Consolidated Plan is adopted for the period July 1, 2020 through June 30, 2025.
2. The proposed Fiscal Year 2020-21 Consolidated Plan First Action Year Plan is adopted for the period July 1, 2020 through June 30, 2021.
3. The allocations of funds for the CDBG, HOME, ESG, and HOPWA programs, program income, and recaptured funds from prior years attached hereto and reflected in the First Action Year Plan are approved.
4. The Mayor is authorized to execute the application documents, to make the required certifications, and to execute the HUD grant agreements.
5. 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, Court Appointed Special Advocate of Oklahoma County, Inc., and the Oklahoma City Housing Services Redevelopment Corporation and Jefferson Park Neighbors Association operating under a Joint Venture Agreement.
6. 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.
7. The Mayor and/or his designee, the Housing and 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 ____ day of _____, 2020.

ATTEST: [SEAL]

CITY CLERK

MAYOR

REVIEWED FOR FORM AND LEGALITY

ASSISTANT MUNICIPAL COUNSELOR

**ATTACHMENT “A”
FUNDING RECOMMENDATIONS**

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)

Sources of Funds

Community Development Block Grant 2020-21	\$5,012,294
2019-20 Recaptured and Reprogrammed Funds and Program Income	\$4,580,698

Total Sources of CDBG Funds	\$9,592,992
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HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME)

Sources of Funds

Home Investment Partnerships Program 2020-21	\$2,379,365
2019-20 Recaptured and Reprogrammed funds	\$608,785
Estimated Program Income	\$80,000

Total Sources of HOME Funds	\$3,068,150
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EMERGENCY SOLUTIONS GRANT PROGRAM (ESG)

ESG funds allocated for 2020-21	427,832
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HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS (HOPWA)

HOPWA funds allocated for 2020-21	\$894,069
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APPLICATIONS OF FUNDS – FY 2020-21 ALLOCATIONS

CDBG:

Decent Housing

Oklahoma City Housing Assistance Program (to include the listed activities):	\$1,300,000
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- Housing Exterior Maintenance Project Activity
- Program Delivery Activity
- OCHA-Inspection Program-Housing Service \$50,000

Oklahoma City Housing Authority (OCHA)	\$235,000
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Community Action Agency (CAA) Emergency Home Repair	\$454,323
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Slum and Blight Remediation

Urban Renewal Authority Completions	\$788,880
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OKC Abandoned Housing-Spot Blight	\$70,000
Public Service Activities	
Strong Neighborhoods Initiative-PS	\$625,000
COTPA (Embarck) Share-A-Fare	\$105,000
Community Action Agency Graffiti Removal	\$10,000
Community Health Services, Inc.-Healing Hands	\$60,000
Court Appointed Special Advocates for Children (CASA)	\$30,000
General Public Services-Unprogrammed	\$583,063
Public Facilities Activities	
Strong Neighborhoods Initiative-PF	\$800,000
Walnut Street Project LLC-Infrastructure	\$335,000
Community Development Program-PF (RFP)	\$1,000,000
Economic Opportunity	
CAA Small Business	\$40,000
Administration	
Metropolitan Fair Housing Council	\$83,000
Planning	\$60,000
Administration	\$859,459
<hr/>	
Unprogrammed Funds	\$2,104,737
TOTAL ALLOCATION OF CDBG FUNDS	\$9,592,992

PRIOR YEAR CDBG PROJECTS/ACTIVITIES TO BE CARRIED FORWARD TO 2020-21 ALONG WITH ANY REMAINING FUNDS:

Community Action Agency Emergency Home Repair (*up to \$145,677 carried forward*)
 OCURA Program Income funds from FY17-18 and FY18-19 (*not to exceed \$307,990*)
 OCURA Urban Renewal Completions, Slum/Blight/Remediation
 OKC Abandoned Housing Program-Spot Blight
 OCHA Inspection Program
 General Public Services-Legal Assistance
 CDBG-CV Short Term Housing and Utility Assistance Program
 CDBG-CV Non-Profit Support Program
 Community Development Public Facilities Program -Unallocated (*Open RFP*)
 Community Development Public Facilities Program-First Step (SRO) OKC Metro Alliance
 Community Development Public Facilities Program-City Care project
 Walnut Street LLC Project-Acquisition
 Section 108 Loan Repayment Contingency
 OCURA Microenterprise Program

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

- Oklahoma City Housing Assistance Program:
- Exterior Maintenance Project Activity
 - Program Delivery Activity
 - OCHA Public Housing Modernization Program

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Metropolitan Fair Housing Council
 Planning
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- Oklahoma City Housing Assistance Program
- Administration

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

- Affordable Housing Development Program-OKC Housing Services Redevelopment Corporation activity
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 - *Jefferson Park CHDO unexpended balance does not include the Walnut Street Project pre-development loan or other CHDO funds.

EMERGENCY SOLUTIONS GRANT (ESG): \$427,832

ESG funds are awarded through an Open Solicitation process. The Continuum of Care Committee will review proposals and make recommendations for funding which will be 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.

HOUSING OPPORTUNITIES FOR PERSONS WITH HIV/AIDS (HOPWA): \$894,069

HOPWA funds are awarded through an Open Solicitation process. The Continuum of Care Committee will review proposals and make recommendations for funding which will be presented to 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.

Program Income

Program income for the 2020-21 First 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 2020-21 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 that is deposited to the City's letter of credit, and that creates additional administrative capacity, may be used by the City for HOME administrative expenses incurred during the Action Year, and excess administrative capacity may be carried forward to subsequent years.
6. Unallocated CHDO funds may be used as loan funds available to CHDOs or reallocated to CHDO set-aside activities as needed to ensure timely allocation and efficient use of these resources in the production of affordable units.

APPENDIX 8

ESG POLICIES AND PROCEDURES



Oklahoma City Continuum of Care

CoC/ESG

Written Standards

OVERVIEW

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act), enacted into law on May 20, 2009, consolidates three of the separate homeless assistance programs administered by HUD under the McKinney-Vento Homeless Assistance Act into a single grant program, and revises the Emergency Shelter Grants program and renames it the Emergency Solutions Grants program. The single grant program authorized by the HEARTH Act is Continuum of Care (CoC). Continuum of Care is a competitive grant operating under an annual Notice of Funding Availability (NOFA). The CoC Program is designed to assist individuals (including unaccompanied youth) and families experiencing homelessness and to provide the services needed to help such individuals move into transitional and permanent housing, with the goal of long-term stability.

The following standards for providing assistance using McKinney-Vento Homeless Assistance funds were created in coordination with the City of Oklahoma City Community and Oklahoma City Continuum of Care. These standards are in accordance with the interim rule for the Emergency Solutions Grant Program, and the final rule for the definition of homelessness; and the Continuum of Care Program Interim Rule.

Each recipient and sub-recipient shall comply with the minimum written standards for providing assistance established by the Oklahoma City CoC. All funds used to provide services to clients served by these programs, including any match and program income funding, shall comply with these same requirements. Each sub-recipient may set their own agency standards for provision of assistance but those standards must at the very least comply with the following guidelines.

CONTINUUM OF CARE PURPOSE

The primary purpose of the Continuum of Care is to:

- promote communitywide commitment to the goal of ending homelessness;
- provide further funding for efforts by nonprofit providers and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness;
- promote access to and effective utilization of mainstream programs by homeless individuals and families;
- optimize self-sufficiency among individuals and families experiencing homelessness.

The Continuum of Care is a geographically based group of representatives from organizations that provide services to the homeless, or represent the interests of the homeless or formerly homeless. The geographic area of the Continuum of Care is the City of Oklahoma City. The CoC is responsible for coordinating and implementing a system for its geographical area. The CoC Board shall develop policies and procedures conforming to the US Department of Housing and Urban Development (HUD) requirements. The CoC Board is to review and prioritize grant recommendations, set funding priorities, and identify data, service and housing needs.

FUNDING AWARD PROCESS OVERVIEW

The application process for CoC and ESG funding begins with the open solicitation that is advertised by the City of Oklahoma City Planning Department. The solicitation details the eligible activities, sets a time and place for a technical assistance session, and lists the evaluation criteria. The CoC Board is open to proposals from agencies that have not previously received funds so long as they meet the eligibility criteria set in the NOFA. The application is submitted electronically and includes; agency information, contact person, proposed activities and funding request sections to describe the services to be provided, past accomplishments or proposed goals with measurable outcomes; any monitoring concerns; and a description of community collaboration. Agencies responding are invited by the CoC Board to answer questions about their program. The CoC Board reviews and recommends funding allocations to the Social Services Committee of the City Council. After this process, granted applicants will be notified of their grants and any conditions imposed on awards. Continuum of Care Applicants that are selected for funding by the CoC Board must also complete a project application in eSnaps that is submitted to HUD for the final decision on projecting funding.

CoC and ESG subrecipients who do not meet local and/or HUD performance targets and/or do not meet expectations and compliance of program and grant management of their CoC/ESG programs, as documented in their APR or monitoring and evaluation reports, may be subject to having their projects reduced in whole or in part and reallocated to other projects.

UNIVERSAL STANDARDS

All service providers who receive funding through the Continuum of Care (CoC) and/or Emergency Solutions Grant (ESG) Programs shall follow the minimum written standards adopted by the Oklahoma City Continuum of Care. Each agency may elect to adopt additional standards so long as the level of services still meets the following guidelines.

PARTICIPANT ELIGIBILITY

Minimum standards for assessing eligibility for assistance under Continuum of Care (CoC) and Emergency Solutions Grant (ESG) are:

- **Street Outreach** – Individuals and families who qualify as unsheltered homeless, based on category (1) of the homeless definition found at 24 CFR 576.2 are eligible for the following activities, in compliance with federal **ESG** rules (24 CFR 576.101): engagement, case management, emergency health and mental health services, transportation.
- **Emergency Shelter** – Individuals and families who qualify as homeless, based on categories (1,2, or 4) of the homeless definition found in 24 CFR 576.2 are eligible for the following activities, in compliance with federal **ESG** rules (24 CFR 576.102): case management, child care, education, employment and life skills services, legal services, health, mental health and substance abuse services, transportation.

- **Homelessness Prevention** – Individuals and families who qualify as ‘at risk of homelessness,’ based on categories (2 or 4) of the “homeless” definition or based on the “At risk of homelessness” definition found at 24 CFR 576.2 and who reside in a housing unit that meets HUD’s habitability and lead-based paint standards and have an annual income below 30% of Area Median Income (AMI), are eligible for up to 24 months total rental assistance in tenant-based or project-based housing. The 24 months may include a one-time payment for up to 6 months of rent arrears on the tenant’s portion of the rent. The rent amount must meet the federal requirements for Fair Market Rent and the HUD standard for rent reasonableness. There must be a rental agreement between the landlord and agency and a written lease between tenant and landlord. Prevention activities are exclusive to **ESG**.

- **Rapid Re-housing** – Individuals and families who qualify as homeless, based on categories (1 or 4) and who are moving into a housing unit that meets HUD’s habitability and lead-based paint standards are eligible for the following activities, in compliance with federal **ESG and CoC** rules (24 CFR 576.104, 576.105, 576.106, 578.37, 578.51, 578.77). Additionally persons receiving rapid re-housing through the ESG program must have incomes at or below 30% of the area median income (AMI).

- **Transitional Housing** – Individuals and families who qualify as homeless, based on categories (1, 2, and 4) are eligible for transitional housing. Providers of transitional housing services shall arrange for or make available services to participants to assist them in securing permanent housing within the time frame of the program. Transitional Housing may be provided in scatter site or single site locations. Individuals and families assisted in transitional housing shall be provided housing accommodations as well as services intended to address issues that may hinder the household from obtaining or maintaining stable long term housing. Transitional Housing activities are excluded to the **CoC program grant**.

- **Permanent Supportive Housing** – Individuals and families who qualify as homeless, based on categories (1 and 4) and at least one adult or child has a disability. Supportive services designed to meet the needs of program participants must be made available to participants. Permanent supportive housing may be provided on a scatter site or single site basis using tenant based rental assistance, leasing, or operating costs to support the operations of a supportive housing facility as well as supportive services to meet the needs of the residents. Permanent Supportive Housing activities are exclusive to the **CoC program grant**.

COORDINATED INTAKE AND REFERRAL SYSTEM

Coordinated Intake is designed to coordinate housing and services for persons who are experiencing homelessness. All providers within the Continuum of Care, except domestic violence or legal services providers, which receive CoC or ESG funds, are required to participate in the coordinated intake system. Individual agencies shall not keep their own priority lists or wait list. All prioritization should be done on the community wide by-name list. For more information refer to the Oklahoma City CoC Coordinated Intake and By Name List Policies and Procedures.

EMERGENCY TRANSFER PLAN

In accordance with the Violence Against Women Act (VAWA), Oklahoma City CoC along with other applicable housing providers allow participants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the participant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.

A participant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, if: the participant reasonably believes that there is a threat of imminent harm from further violence if the participant remains within the same unit. If the participant is a victim of sexual assault, the participant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer. A participant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan. Participants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

To request an emergency transfer, the participant shall notify the applicable housing provider and submit a written request for a transfer to the assigned case manager. Oklahoma City CoC housing providers will provide reasonable accommodations to this policy for individuals with disabilities. The participant's written request for emergency transfer should include either:

1. A statement expressing that the participant reasonably believes that there is a threat of imminent harm from further violence if the participant were to remain in the same dwelling unit assisted under Oklahoma City CoC; OR
2. A statement that the participant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the participant's request for an emergency transfer.

Oklahoma City CoC housing providers will keep confidential any information that the participant submits in requesting an emergency transfer, and information about the emergency transfer, unless the participant give written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the participant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the participant.

Oklahoma City CoC housing providers cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. Oklahoma City CoC housing providers will, however, act as quickly as possible to move a participant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a participant reasonably believes a proposed transfer would not be safe, the participant may request a transfer to a different

unit. If a unit is available, the transferred participant must agree to abide by the terms and conditions that govern occupancy in the unit to which the participant has been transferred. Oklahoma City CoC housing providers may be unable to transfer a participant to a particular unit if the participant has not or cannot establish eligibility for that unit. If Oklahoma City CoC housing providers have no safe and available units for which a participant who needs an emergency transfer is eligible, Oklahoma City CoC housing providers will assist the participant in identifying other housing providers who may have safe and available units to which the participant could move.

If a family who is receiving tenant-based rental assistance separate, the family's TBRA and any utility assistance shall continue for the family members who are not evicted or removed. However, if the family's eligibility for housing was based on the evicted or removed individual's disability or chronically homeless status, the remaining members may stay in an assisted unit until expiration of the current lease term.

Priority shall be given for eligible individuals and families who are relocating as per the Emergency Transfer Plan. All CoC funded transitional housing, rapid re-housing, and permanent supportive housing programs will ensure that applicants are prioritized according to the emergency transfer priority required under 24 CFR 578.99(j)(8).

HOUSING FIRST

The Housing First approach is a data driven solution to homelessness. All Oklahoma City CoC housing and service providers shall use the Housing First model outlined below. Any new housing projects funded by the CoC must use the Housing First model. Any existing permanent supportive housing program that has indicated in application to HUD that it employs the Housing First model must follow the standards set forth below. Existing housing projects that have not indicated Housing First are 'grandfathered' from this policy.

- Housing is not contingent on compliance with services. Participants are provided with a standard one year lease agreement. The lease agreement can only be terminated in accordance with the State of Oklahoma Residential Landlord and Tenant Acts.
- Participants are provided with services and supports to help maintain housing and prevent eviction.
- There is no requirement for sobriety prior to being offered housing and admission should not be conditioned on credit or background checks. Criminal backgrounds will be considered only to the extent necessary to protect safety and well-being.
- Participants shall be given choice in their housing subject to program limitations.
- Participants are not required to participate in services but providers are required to persistently and consistently seek to engage participants.
- Providers are encouraged to support staff in implementing evidence based practices that support housing first.

HMIS

All CoC and ESG recipients, except for victim service providers must actively utilize the Homeless Management Information System (HMIS), to enter data on individuals served and assistance provided under ESG and CoC. Victim service providers shall actively utilize a comparable data system that meets HUD's standards (24 CFR 576.106). The HMIS database is designed to record and store client-level data, including the characteristics and service needs of people who are homeless or at-risk of homelessness. Utilization of the HMIS database will help provide consistent and accurate snapshot of populations served through various programs.

Agencies utilizing the HMIS database are expected to comply with the data quality standards. Client level data should be entered into HMIS within 72 hours of client entry or exit.

INCOME DETERMINATION

Minimum standards for determination of an individual or family's annual income consist of calculating income in compliance with 24 CFR 5.609. Individuals and families assisted under ESG are required to have annual incomes at or below 30% of Area Median. There are no income limits of CoC assistance but in all instances in which participants are charged rents or occupancy charges, the amount charged must be based on participant's verified annual income for all sources. In verifying income, ESG and CoC funded providers are required to obtain third party verification whenever possible. Self-certification or verification is to be accepted only when all efforts have been made to obtain third party verification have not produced results.

COORDINATION WITH MAINSTREAM AND TARGETED HOMELESS PROVIDERS

CoC and ESG sub-recipients are expected to maximize the use of available Federal, State and local mainstream resources to ensure the long-term stability of program participants. Providers shall actively seek to engage partnerships with programs and services that are targeted to address homelessness and poverty within their communities.

DISCHARGE PLANNING

Each Oklahoma City CoC services provider must develop and implement, to the maximum extent practicable, policies and protocols for the discharge of persons from public funded institutions and systems of care (such as health care facilities, foster care, or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons.

EDUCATIONAL ASSURANCES

CoC and ESG sub-recipients are expected to collaborate with local education authorities to assist in the identification of individuals and families who become or remain homeless and are informed of the eligibility for services under subtitle B of the title VII of the McKinney-Vento Act. Service providers must have written policies in place which ensure that homeless individuals and families who become homeless are informed of their eligibility for and receive access to educational services. Agency policies

should include how homeless families with children will be informed of and referred to the school district's homeless liaison. This includes demonstrating that providers establish policies to ensure all children are enrolled in early childhood programs or in a school and connected to appropriate services in the community. Providers shall collaborate with the local school districts and early childhood education providers to identify homeless households with children to ensure they understand their eligibility for educational services. Such policies should also include information for all homeless individuals and families regarding local technical schools and universities which may offer programs and assistance for persons who are homeless. These policies must have identified a staff person responsible for ensuring that children being served are enrolled in school and connected to appropriate services.

INVOLUNTARY FAMILY SEPERATION

Maintaining family unit is important when homeless households with children under the age of 18 enter homeless shelters or housing. Oklahoma City CoC expects providers to ensure homeless households with children under the age of 18 are not denied admission and are not separated. In addition, a broad definition of family should be used that allows for female headed, male-headed, two parent, same sex parent, LGBT parent, and extended families be served together with their children.

TERMINATION OF ASSISTANCE

All participants must be given a copy of the program rules and termination process before the participant receives services. If a program violation occurs and the provider terminates assistance as a result, the termination shall follow an established process that recognizes the rights of the individuals affected. Termination shall only occur in the most severe cases after other remedies have been attempted. Individuals and families facing program termination should be given written notice clearly stating the reasons for termination. They must also be given the opportunity to present objections to the decision and to have representation. Any appeal of a decision shall be heard by an individual different from and not subordinated to the initial decision maker. Prompt written notice of the final decision on the appeal must be provided. Termination must not bar the provider from providing later additional assistance to the same family or individual.

OCCUPANCY STANDARDS

All housing units, including scattered site programs owned and managed by private landlords, must meet applicable state or local government health and safety codes and have current certificate of occupancy for the current use and meet or exceed the following minimum standards:

- Building must be structurally sound to protect from the elements and not pose any threat to health and safety of the residents
- Must be accessible in accordance with Section 504 of the Rehabilitation Act, the Fair Housing Act and the Americans with Disabilities Act where applicable
- Must provide an acceptable place to sleep and adequate space and security for themselves and their belongings
- Each room must have a natural or mechanical means of ventilation

- Unit must have at least one bedroom or living/sleeping room for each two persons
- Children of the opposite sex, other than very young children, are not required to occupy the same bedroom or living/sleeping room.

LEAD-BASED PAINT

Minimum standards for all program participant-occupied housing consist of compliance with the lead-based paint remediation and disclosure requirements identified in 24 CFR 576.403.

HOMELESS PARTICIPATION

Each funded provider of CoC or ESG assistance must develop policies to provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or equivalent policymaking entity of the provider (24 CFR 578.759(g)). To the maximum extent possible, the provider shall involve homeless individuals and families in paid or volunteer work on the ESG or CoC funded facilities, in providing services under ESG or CoC and in providing services for occupants of ESG or CoC funded facilities (24 CFR 576.405 and 578.75).

FAITH-BASED ACTIVITIES

Providers receiving CoC or ESG funding shall not engage in inherently religious activities as part of the CoC or ESG funded programs or services. Such activities must be offered separately from CoC or ESG funded programs and services and participation must be voluntary. A religious organization receiving CoC or ESG funding retains independence from government and may continue with its mission provided that CoC and ESG funds are not used to support inherently religious activities. An organization shall not discriminate against a participant or prospective participant based on religion or religious beliefs.

NON-DISCRIMINATION

All CoC and ESG service providers must have written non-discrimination policies in place. These policies must outline actions to be taken to ensure outreach to homeless persons with the greatest risk of remaining homeless, and compliance with all federal statutes. Service providers should ensure they are using appropriate, inclusive language in communications, publications, training, personnel handbooks and other policy documents that affirms the agency's commitment to serving all eligible clients in adherence with the Equal Access Rule. Oklahoma City CoC requires services providers to practice a person-centered model that incorporates participant choice and inclusion of all homeless subpopulations present in Oklahoma City, including homeless veterans, youth, and families with children, individual adults, seniors, victims of domestic violence, Lesbian, Gay, Bisexual, Transgender, Queer or Questioning, and Intersex individuals and families. All CoC and ESG funded service providers must ensure that all people have fair and equal access to the coordinated entry process and all forms of assistance regardless of race, ethnicity, national origin, age, sex, familial status, religious preference, disability, type or amount of disability, gender identity, perceived gender identity, marital status, sexual

orientation, or perceived sexual orientation. All CoC and ESG funded service providers must ensure placement and accommodations are made in accordance with an individual's gender identity.

PROGRAM INCOME

Program income earned during the project period shall be retained and used to finance the non-federal share of the project or program. Records of the receipt and use of program income shall be retained. Program income may be used to meet matching funding requirements.

RECORDKEEPING

Program participant records shall include written:

- Determination and certification that the program participant met the criteria for being homeless or at risk of homelessness and that an effort was made to obtain written third-party verification.
- Determination and certification that the program participant was eligible for the particular services and/or financial assistance.
- Determination and certification that the program participant lacked sufficient resources and support networks to provide the assistance.
- Determination and certification that the program participant met income requirements and that an effort was made to obtain written third-party verification. This includes annual documentation of income for each participant who receives housing assistance where rent is paid by the program participant.
- Determination and certification that only households served through permanent supportive housing meet HUD's requirements of having a family member be a person with disabilities. (CoC Only)
- Identification of the specific services and financial assistance amounts that were provided to the program participant.
- When applicable, verification that services were terminated in compliance with the written standards.
- Copies of written leases and rental agreements, documentation of payments made, including dates of occupancy, and compliance with fair market rents, rent reasonableness and utility allowance requirements.
- Determination and verification that the housing unit met HUD's habitability and lead-based paint standards.
- Copy of individualized housing stability plan.
- Notes verifying case management services were provided at least monthly, until exempt from this requirement.
- Notes verifying program participants' eligibility was re-evaluated at least every 3 months for homelessness prevention services or at least annually for rapid rehousing services. (ESG Only)
- Notes verifying program participant was assisted to obtain necessary mainstream and other resources.

Program policies and procedures shall indicate:

- Services are coordinated with other homeless assistance/prevention programs and mainstream services and assistance programs.
- Compliance with HUD's (24 CFR 576 and 578) requirements for:

1. Shelter and housing standards
 2. Conflict of Interest
 3. Homeless participation
 4. Faith-based activity
 5. Nondiscrimination, equal opportunity and affirmative outreach
 6. Uniform administrative rules
 7. Lobbying and disclosure
 8. Displacement, relocation and acquisition
 9. Procurement
- Program participant records are kept secure and confidential.
 - Participation in HMIS.

Financial records shall include:

- Supportive documentation for all costs charged to the ESG or CoC grant.
- Documentation showing ESG or CoC funds were spent on allowable costs in accordance with the requirements for eligible activities and costs principles.
- Documentation of the receipt and use of program income.
- Documentation of the receipt and use of matching funds.
- Copies of procurement contracts.

CONFIDENTIALITY

All records containing protected identifying information of any individual or family who applies for and/or receives Continuum of Care assistance will be kept secure and confidential. The address or location of any family violence project assisted with Continuum of Care funds will not be made public, except with written authorization of the person responsible for the operation of the project. The address or location of any housing of a program participant will not be made public, except as provided under a preexisting privacy policy of the subrecipient and consistent with State and local laws regarding privacy and obligation of confidentiality.

PREVENTION AND RAPID RE-HOUSING STANDARDS

ELIGIBILITY

Prevention: To be eligible for homelessness prevention services through the ESG individuals and families must have an annual income below 30% of the median income for the area and meet the federal criteria under the at risk of homelessness definition in 24 CFR 576.2 or meet the criteria in category 2 or 4 of the homeless definition in 24 CFR 576.2.

Rapid Re-housing: To be eligible for rapid re-housing assistance through the ESG individuals and families must:

- Meet the federal criteria under category (1) of the homeless definition in 24 CFR 576.2.
- Meet with federal criteria under category (4) of the homeless definition in 24 CFR 576.2 and live in an emergency shelter or other place described in category (1) of the homeless definition.

- Have an income that is less than or equal to 30% of the Area Median Income.
- Must lack sufficient resources or support networks to retain housing without assistance.

PRIORITY POPULATIONS

- Families with children;
- Domestic violence survivors
- Single persons without long term disabilities; and
- Veterans, especially those that are not eligible for services from the Department of Veteran Affairs (VA).

SERVICE TYPE, AMOUNT & DURATION

Minimum standards for determining the type, amount and duration of housing stabilization and/or relocation services provided to a program participant, including maximum amount of assistance, maximum number of months the program participant may receive assistance, or the maximum number of times the program participant may receive assistance, are:

a) Financial Assistance:

- Use with other subsidies: Payment for Financial Assistance costs shall not be provided to a participant who is receiving the same type of financial assistance through other public sources.
- Rental application fees: Payments shall only be made for fees charged by the owner to all applicants.
- Security deposits: Payments shall not exceed two (2) month's rent.
- Last month's rent: Payment shall not exceed one (1) month's rent and shall be included in calculating the participant's total assistance.
- Utility deposits: Payments shall only be made for gas, electric, water and sewage deposits.
- Utility payments:
 - Payments shall not exceed 24 months per participant, including no more than 6 months of utility payments in arrears, per service;
 - A partial payment counts as 1 month;
 - Payment shall only be made if the utility account is in the name of the participant or a member of the same household;
 - Payment shall only be made for gas, electric, water and sewage costs;
 - Participants shall not receive more than 24 months of utility assistance within any 3-year period.

b) Rental Assistance

- Payment shall not exceed 24 months total during a 3-year period in tenant-based or project-based housing.
- Payment for short-term rental assistance shall not exceed 3 months.
- Payment for medium-term rental assistance shall be for more than 3 months, but shall not exceed 24 months.

- Payment for rent arrears shall not exceed 6 months and shall be a one-time payment, including any late fees. The number of months paid in rental arrears must be considered as part of the 24 months of allowable service.
- Except for one-time payment of rental arrears on the participant's portion, payment shall not be provided to a participant who is receiving tenant-based rental assistance or living in a unit receiving project-based assistance.
- Payment shall not exceed Fair Market Rent established by HUD and shall comply with HUD's standards of rent reasonableness.
- Calculation of the rental payment amount shall only include monthly rent for the unit, any occupancy fees under the lease (except for pet or late fees) and if the participant pays separately for utilities, the monthly utility allowance established by the Oklahoma City Housing Authority.
- Payment for rent shall only be made when there is a rental assistance agreement between the agency and the owner, which sets forth the terms under which rental assistance will be provided, including the prior requirements; a requirement that the owner provide the provider with a copy of any notice to vacate given to the participant or any complaint used to commence an eviction action; and the same payment due date, grace period, and late payment penalty requirement as the participant's lease.
- Payment of any late payment penalties incurred by the provider shall not be claimed for reimbursement by ESG.
- Payment shall only be made when there is a legally binding, written lease for the rental unit between the participant and the owner, except for payment of rental arrears.
- Payment shall only be made once the participant has been deemed eligible for assistance.
- Payments shall not be made until required re-certifications have been completed and all documentation of continued eligibility is received.

PERMANENT SUPPORTIVE HOUSING STANDARDS

ELIGIBILITY

Minimum standards for determining and prioritizing which eligible families and individuals shall receive permanent supportive housing are:

- To be eligible for permanent supportive housing people must: meet the federal criteria under category (1) or (4) of the homeless definition in 24 CFR 576.2. Eligible households include individuals with disabilities and families in which one adult or child has a disability.

DOCUMENTS REQUIRED AT INTAKE

Documentation should not denote a barrier to housing. Permanent Supportive Housing providers will request the documents listed below; but if any are not available, the housing provider will work to obtain all documents within 45 days of program intake.

1. Identification - Copy of (1) form of identification.

2. Homeless Status – Providers should make every effort to meet the federal standards of documentation. Providers should make every effort to receive 3rd party documentation. If 3rd party documentation is not available 2nd party documentation or observation by a homeless services provider is acceptable. At a minimum, client self-certification will be accepted with documentation of 3rd and 2nd party attempts. Records contained in HMIS or comparable database used by a victim service or legal service provider are acceptable evidence of 3rd party documentation.

3. Disability – Documentation of disability can include verification of disability benefits or a written signed statement from a qualified source. Written documentation should: (a) identify the physical mental or emotional impairment, why it is expected to be of long-continued or indefinite duration, how it impedes the individual’s ability to live independently, and how the individual’s ability to live independently could be improved by more suitable housing conditions; or (b) identifies a developmental disability; or (c) identifies AIDS or related conditions. Lack of disability documentation must not prevent an individual or family from being admitted to a permanent supportive housing program. Programs may enroll the person or family without such documentation, but documentation must be obtained within 45 days of date of intake. A copy of a disability check is adequate documentation. Permanent Supportive Housing providers can serve households in which either an adult, or a child, has a disability.

4. Chronically Homeless Status – Providers must gather evidence of length of homelessness or number of times an individual or family has been homeless. HMIS provides an official 3rd party record of homelessness that can be used for this purpose.

5. Income verification – Even though the program may not have an income requirement at entry documentation of the client’s income must be obtained from all sources if a client is responsible for paying a portion of the rent.

PRIOTIZATION FOR PSH BEDS DEDICATED OR PRIORTIZED FOR CHRONIC HOMELESSNESS

The following order shall be followed in CoC funded permanent supportive housing beds dedicated to persons experiencing chronic homelessness, and permanent supportive housing beds prioritized for persons experiencing chronic homelessness:

1. Homeless individuals and families with the longest history of homelessness and with the most severe service needs.
2. Chronically homeless families and individuals with the longest history of homelessness.
3. Chronically homeless families and individuals with the most severe service needs.

PRIOTIZATION FOR PSH BEDS NOT DEDICATED OR PRIORTIZED FOR CHRONIC HOMELESSNESS

The following order shall be followed in CoC funded permanent supportive housing beds NOT dedicated to persons experiencing chronic homelessness, and permanent supportive housing beds NOT prioritized for persons experiencing chronic homelessness:

1. Homeless individuals and families with a disability and the most severe needs.
2. Homeless individuals and families with a disability with a long period of continuous or episodic homelessness.
3. Homeless individuals and families with a disability coming from transitional housing.

*As all CoC & ESG funded organizations are required to take clients through the Coordinated Entry System (CES), prioritization should already be addressed before a referral is even made. Providers should only have to obtain the required documentation to verify the client's status.

PARTICIPANT CONTRIBUTION

Individuals and families residing in permanent supportive housing are required to pay rent. Rent charges may not exceed those specified in 578.77. No fee other than rent or occupancy charges may be charged to program participants. This includes meal, copayments for services, transportation and all other services that may be provided to program participants.

TRANSITIONAL HOUSING STANDARDS

ELIGIBILITY

Minimum standards for determining and prioritizing which eligible families and individuals shall receive transitional housing are:

- To be eligible for transitional housing people must: meet the federal criteria under category (1) or (4) of the homeless definition in 24 CFR 576.2.

DOCUMENTS REQUIRED AT INTAKE

Documentation should not denote a barrier to housing. Transitional Housing providers will request the documents listed below; but if any are not available, the housing provider will work to obtain all documents within 45 days of program intake.

1. Identification - Copy of (1) form of identification.
2. Homeless Status – Providers should make every effort to meet the federal standards of documentation. Providers should make every effort to receive 3rd party documentation. If 3rd party documentation is not available 2nd party documentation or observation by a homeless services provider is acceptable. At a minimum, client self-certification will be accepted with

documentation of 3rd and 2nd party attempts. Records contained in HMIS or comparable database used by a victim service or legal service provider are acceptable evidence of 3rd party documentation.

3. Income verification – Even though the program may not have an income requirement at entry documentation of the client’s income must be obtained from all sources.

PRIORITY POPULATIONS

In providing transitional housing providers shall prioritize the following populations:

- Family with head of household between ages of 18-24 years of age
- Households with behavioral health needs
- Households experiencing domestic violence

MINIMUM STANDARDS

All referrals to transitional housing must be made through the coordinated entry system. The following minimum standards will be applied to all transitional housing programs:

- Maximum length of stay cannot exceed 24 months.
- Assistance in transitioning to permanent housing must be made available/provided.
- Supportive services must be provided throughout the duration of stay in transitional housing.
- Program participants in transitional housing must enter into a lease, sublease, or occupancy agreement for a term of at least one month. The lease, sublease, or occupancy agreement must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum of 24 months.




Homeless Definition

CRITERIA FOR DEFINING HOMELESS	Category 1	Literally Homeless	<p>(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <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	<p>(2) Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <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	<p>(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:</p> <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	<p>(4) Any individual or family who:</p> <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

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.

Commonly Referred to Links

1. Oklahoma City CoC Coordinated Intake & By Name List Procedures
<http://coalitiontoendpoverty.org/wp-content/uploads/2017/10/Oklahoma-City-CoC-Policies-and-Procudures.pdf>
2. Oklahoma Landlord and Tenant Acts
<https://www.ok.gov/OREC/documents/Landlord%20and%20Tenant%20Act%20Update.pdf>
3. Guidance Posted on ESG Minimum Habitability Standards and Permanent Housing
<https://www.hudexchange.info/news/new-guidance-posted-on-esg-minimum-habitability-standards-for-emergency-shelter-and-permanent-housing/>
4. HUD Income Limits
<https://www.huduser.gov/portal/datasets/il.html>
5. HUD FMR
<https://www.huduser.gov/portal/datasets/fmr.html>
6. 24 CFR 578.77 Calculating occupancy charges and rent
<https://www.law.cornell.edu/cfr/text/24/578.77>

APPENDIX 9

AP-75 NARRATIVE RESPONSES (CONTINUATION)

APPENDIX 9A

SUMMARY OF EFFORTS TO NARROW THE DIGITAL DIVIDE AND INCREASE RESILIENCE TO NATURAL HAZARDS

A. Assessing Broadband Availability for Low-Moderate Income Residents.

The Federal Communications Commission (FCC) established the Lifeline program in 1984 to provide qualified individuals with discounts on phone service. In 1997, the FCC broadened the scope of the program under the Universal Service Order to offer the Lifeline Program to assist low-income customers by helping to pay for monthly telephone charges so that connection to job, family and emergency services is more affordable. Due to the rise of cell phones, the FCC made more changes in 2005 so wireless phone service providers could offer free cell phone service using Lifeline benefits. 1

On March 31, 2016, FCC modernized and reformed its Lifeline program to help low income consumers afford access to the 21st Century's vital communications network- the internet. 2

FCC ensures that Lifeline subscribers receive services meeting 21st Century needs by

- Setting minimum standards for broadband to enable consumers to fully participate in digital society:
 - Fixed speed standard based on what a substantial majority of consumers receive (currently 10 Mbps downloads/1 Mbps uploads).
 - Sets minimum monthly fixed broadband usage allowance standard, starting at 150 GB.

After analyzing the availability of broadband access to low- and moderate-income families in Oklahoma City and surrounding areas:

- There are seventy-four (74) providers throughout the Oklahoma City and surrounding areas.
- Statistics show there is a common download speed of 100-1000 megabits per second (Mbps),
- The two largest competitors for broadband services in Oklahoma City, Cox and AT&T, both have programs to provide services for low-moderate income households, but they do not meet the common download speed for broadband services:

In 2012, Cox partnered with Connect2Compete to enable eligible low-income households to receive discounted Cox high speed cable Internet for only \$9.95 a month. This includes: 10 Mbps Internet Download Speed, Free Installation, and Waived Modem Rental Fees. The requirements are: To qualify, at least one student in grades K-12 must live in the household, and the household must be participating in one of these government assistance programs: free or reduced lunch through the National School Lunch Program (NSLP), Temporary Assistance for Needy Families (TANF), the Supplemental Nutrition Assistance Program (SNAP), or Public Housing (ConnectHome Program). Also, the household must not have been a Cox High Speed Internet service subscriber in the last 90 days or have outstanding Cox bills or unreturned equipment.

In July 2015, AT&T and DirecTV merged, and the FCC imposed conditions for the following four years. AT&T was to provide an affordable low-income Internet access program. AT&T Access Internet is now available where AT&T wired home internet is offered. Depending on the internet speeds available in the resident's location, the monthly cost is either \$10 for 10 Mbps or 5 Mbps plans and \$5 for 3Mbps Internet

connection. The user does not get to choose the option; AT&T installs whichever is fastest in the area in which the resident lives. The installation and rental equipment are free. To participate, a person must be on the SNAP program- meaning single adults and families without school age children can also qualify for the low-income Internet service discount. Also, the family must have no outstanding debt for AT&T fixed Internet service within the last six months or outstanding debt incurred under this program.” 4

So, what can a household do with ten (10) Mbps? Five users on their computers can check or reply to emails, browse the web for information and upload or download small files.⁵ Five (5) Mbps is the minimum download speed for watching HD Netflix on a laptop.⁶ Upload speeds typically tend to be between 5% and 25% of the download speeds for home connections. Most home users can watch movies, surf web pages or download new software. Although these activities have some upload component, the vast majority of the data is downloaded so home connections are optimized for this ⁷ Three Mbps is slow internet, but it is better than having no internet access at all.

Low-moderate income families can use these programs offered by these companies if they fit within the guidelines and are within the company’s service areas. Review of the FCC’s broadband services providers map suggests that all areas within Oklahoma City are covered by one or more of the broadband service carriers. The Oklahoma Broadband Mapping Project was a 2010 initiative to show data related to broadband availability and speed across the state. Maps are accessible, but it is unclear whether they are current. Although, spotty areas of slow to no reception are visible, most of the metro area appears well covered in the posted maps.

B. Incorporation of Resilience to Natural Hazard Risks

Pursuant to Executive Order 13653, “Preparing the United States for the Impacts of Climate Change,” HUD requires jurisdictions “to consider incorporating resilience to natural hazard risks, taking care to anticipate how risks will increase due to climate change, into develop of the Consolidated Plan in order to begin addressing impacts of climate change on low- and moderate-income residents.” The Fourth National Climate Assessment, published by the U.S. Global Change Research Program in 2018, defines climate change as “changes in average weather conditions that persist over multiple decades or longer. Climate change encompasses both increases and decreases in temperature, as well as shifts in precipitation, changing risk of certain types of severe weather events, and changes to other features of the climate system.” This consideration of climate change is “to be conducted using readily available data sources developed by Federal government agencies, other available data and analyses (including State, Tribal, and local hazard mitigation plans that have been approved by the Federal Emergency Management Authority (FEMA)), and data that State and local governments grantees may have available to them.”

The City of Oklahoma City has made use of a variety of data, analyses, and reports to determine, document, and project the expected impacts of climate change on services, infrastructure, and its residents. The City Planning Department has been working on **Adaptokc** as a subsidiary of our Comprehensive Planning process, **planOKC**. **Adaptokc** has not yet been finalized and adopted by the City but focuses on three sustainability principles: 1) positioning OKC to lead by example as a steward of public resources, 2) **adapting OKC’s infrastructure, services, and communities to OKC’s changing climate**, and 3) identifying how to use technological innovations to OKC’s advantage. Reference documents describing observed climate changes and the impact thereof follow.

The September 2015 *Climate in the Heartland* report prepared by the Urban Sustainability Directors Network (USDN) examined five major cities in the Midwest- one of which was Oklahoma City (OKC). Historical climate variability studies from the past three decades were looked at by climatologists and compared to recent weather changes. OKC's historical context showed the annual average high and low temperature of 72.2°F and 50.8°F., and the average precipitation was 36.5" of annual rainfall and 7.8" of annual snowfall. However, recent observed seasonal weather changes include:

- Summers have increased variability in seasonal precipitation totals;
- More frequent warm nights in the last decade;
- Falls are dryer with an average date of first frost being three (3) days later;
- Winters are warmer and wetter; and
- OKC is having fewer cool springs and the average date of last frost is four (4) days earlier.

Lifting the High Energy Burdens in America's Largest Cities is a 2016 report by the American Council for an Energy-Efficient Economy (ACEEE) created to understand the income inequality caused by high home energy burdens while offering suggestions to make utilities more affordable to low-income communities. According to ACEEE the State of Oklahoma's average utility responsibility (also described as "energy burden", defined as the percentage of annual household income which goes to utility bills) is below 3 percent. However, Oklahoma City's average sits above that at approximately 3.5 percent for low-moderate income families. This was calculated using the Energy Consumption Survey from the Energy Information Administration (EIA) and US Census Bureau data between 2011 and 2013 to determine the average household income and what these households spent annually on energy bills. [Note that overall Oklahoma City enjoys lower energy costs than most other areas of the country. For comparison, the cost in ten other cities with the highest utility bills ranges from 4.3% to 6.2% of household incomes.]

The ACEEE report correlated energy burdens to the race of householders. On average African American and white households paid similar utility bills, but because African American household incomes were lower, their 'energy burden' (defined as utility costs as a percentage of household income) was 64% higher than white households. Latino households paid lower utility bills on average than African American and white households, yet they experienced a 24% higher energy burden than white households.

In 2013, a sample size of 3,304 households in Oklahoma City was used for comparing median gross household income percentages and energy cost burden percentages in each group calculation. Results are summarized below.

GROUP	AVG YEARLY INCOME	UTILITY BURDEN
1,310 low income HH	\$24,998	7.36%
214 low income multi-family*	\$21,996	5.21%
354 African American HH	\$34,949	4.98%
319 Latino HH	\$39,994	4.26%
1,034 renting households	\$34,972	4.27%

* Multi-family group includes those living in duplexes or apartments.

Further, the percentage of households with energy burdens over twice the Oklahoma City average for all households combined was 22.19%; for low-income households- 52.90%; for multifamily households-

36.92%; for African American households- 33.62%; for Latino households - 26.96%; and for renting households- 29.21%.

The report concludes that low-income, low-income multifamily, African American, Latino, and renters devote a disproportionate share of their income to energy expenses. Low-income households typically live in less energy efficient housing and are often more difficult to reach with information about energy efficiency programs.

The ***City of OKC Hazardous Mitigation Plan (HMP)*** is used to evaluate natural hazard threats to the City and its communities and determine appropriate hazard mitigations strategies. The City of Oklahoma City's plan was originally approved in 2006 and last updated and approved by FEMA and adopted by the City Council on October 24th, 2017. The plan area includes land within the corporate limits of The City of Oklahoma City. Reviewing the community's past natural hazards helps prepare for future hazards and risks including flooding, tornadoes, lightning, hail, extreme heat, drought, wildfire and high winds. The City's goals for having a HMP are to reduce loss of life, protect the public's health and safety, minimize damage to property including critical facilities, infrastructure and key resources; and to maintain or restore the capacity of the natural environment and increase community preparedness for natural disasters.

Concerns in the above-mentioned document:

- The increase of inundating rainfall events and associated flooding can increase the operating and maintenance cost of infrastructure, and assets.
- An increase in temperatures leads to hotter, dryer summers creating an increase in utility consumption, higher bills and emitting more emissions into the environment.

All reports examined conclude climate changes will result in increased burdens on low-mod income families having to pay for more energy use in their homes which may be made worse by inefficient windows and appliances and poor insulation. Higher utility/housing costs result in less income available for necessary living expenses including food, clothing and medical expenses.

- Programs that may help low-income households decrease energy burden are those that include weatherization, increased insulation in homes, and replacing old appliances to decrease utility usage.
- Apartment owners should also be encouraged to employ the same efforts on their buildings.
- The City's Housing Rehabilitation programs should maintain focus on energy efficiency repairs and replacement units.

These actions will help save residents money and help maintain or restore our natural environment through decreased energy consumption.

Appendix 10

Analysis of Impediments Report



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Oklahoma City

Analysis of Impediments to Fair Housing Choice

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EXECUTIVE SUMMARY

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE
OKLAHOMA CITY

Executive Summary

Oklahoma City Analysis of Impediments to Fair Housing Choice

The Analysis of Impediments to Fair Housing Choice, or AI, is a planning process for local governments and public housing agencies (PHAs) to take meaningful actions to overcome historic patterns of segregation, promote fair housing choice, and foster inclusive communities that are free from discrimination.

Primary Findings

The analyses of demographics (Section I), disproportionate housing needs (Section II), land use and zoning (Section III), and access to opportunity (Section IV), yield the following primary findings.

Demographic patterns—segregation and integration:

- African American residents have historically faced the most housing and economic exclusion in the region. This is manifest in the city's concentrated areas of poverty, which continue to be disproportionately occupied by African American residents. However, recent demographic trends show African Americans moving from traditionally higher poverty areas into more suburban areas with the city.
- Hispanic residents, whose population has increased significantly in recent decades, are increasingly concentrated within the city's highest poverty areas.
- Oklahoma City has 19 Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs). These are neighborhoods that have a poverty rate of 40 percent and higher and are more than 50 percent Non-White and Hispanic residents. All of the R/ECAPs in the greater region are located within Oklahoma City's boundaries.
- Segregation, which has historically been most prominent for African American residents, has decreased modestly since 1990 as measured by the Dissimilarity Index (DI). Segregation of Asian residents, which has been historically low, has also been declining. In contrast, segregation, as measured by the DI has been increasing for Hispanic residents.

Disproportionate housing needs:

- Rising rents and tightening of the rental market has disproportionately hurt very low income single-person households and families, many of whom are racial and ethnic minorities, persons with disabilities, and elderly residents.

- Similarly, rising home prices has introduced predatory lending and home purchase activity—e.g., “we’ll buy your house as is” offers, rent to own scams, and predatory lending.
- Weak state laws to protect tenants from evictions without just cause exacerbates their vulnerability and increases homelessness, an undesirable outcome which is costly for the public sector.
- Residents and landlords would benefit from increased education and training, including fair housing laws and requirements and “good tenant” classes. Fair housing information should be more intentionally marketed through social service agencies and in grassroots newspapers and social media networks.
- There is growing concern about the effect of city-facilitated redevelopment efforts on displacement of low income and minority residents and skepticism that leadership is working in the best interest of these residents.
- Multifamily developments are not being built to comply with the accessibility requirements under the Fair Housing Act due to lack of inspection/testing and enforcement.

Land use and zoning. The regulatory review of Oklahoma City’s zoning and land use policies found many areas where the code could be clarified or strengthened to avoid fair housing challenges. Areas to clarify or strengthen include: the code’s definition of family; the code’s treatment of persons living in group homes; and densities and development standards to accommodate a wide range of housing types and products to encourage affordability and discourage economic segregation.

Access to opportunity:

- Compared to other cities in the Oklahoma City region and Tulsa, African American and Hispanic residents in Oklahoma City are more likely to live in high poverty neighborhoods. In fact, Non-Hispanic White and Asian residents living below poverty in Oklahoma City have better access to low poverty neighborhoods than do African American and Hispanic residents overall. This is a factor of the concentration of many African American and Hispanic residents in a handful of high-poverty neighborhoods within the city.
- African American, Hispanic, and Native American children have lower access to high performing elementary schools relative to Non-Hispanic and Asian children. This is true for many cities in the region and for Tulsa. Only Edmond demonstrates high levels of proficiency for students across races and ethnicities and income levels.
- Oklahoma City offers equal access to jobs among races and ethnicities and income levels. Yet there is significant disparity in unemployment and educational attainment among residents, meaning that not all residents can benefit from city’s labor market. Expanding employment access and opportunities for Hispanic, African American, and Native American residents would benefit these residents and the city overall.

- Residents and stakeholders who participated in focus groups about barriers in access to economic opportunity focused on inadequate transportation—especially public transit to serve persons with disabilities; needed accessibility improvements and more equitable distribution of quality parks; and equity in education.

Priority Areas for 2020-2024

Decades of exclusionary policies at the federal, state, and local level limited the ability of many racial and ethnic minorities, people with disabilities, women, and non-traditional households from exercising housing choices and building wealth. The effects of these policies are challenging to reverse—yet, as demonstrated by many of the indicators in this AI, and the discussion city efforts in Section V, progress is being made within Oklahoma City. The areas where the city should continue to work to break down barriers to housing choice and economic opportunity include:

- **Expand affordable rental housing options** for extremely low income residents who are most vulnerable to discrimination, evictions, displacement, severe cost burden, and homelessness. These residents are disproportionately likely to be racial and ethnic minorities, women/single mothers, persons with disabilities, and persons with mental illness challenges;
- **Improve resident and landlord understanding of fair housing rights** and responsibilities, as well as good tenant and good landlord practices;
- **Narrow the gap in mortgage loan denials and subprime loans** among minority residents, improving low homeownership rates, and combatting predatory lending activity. Work with partners to narrow the gap in mortgage loan denials and subprime loans among minority residents through education and outreach activities that combat predatory lending and expand alternative ownership products (e.g., attached and land trust products).
- **Mitigate displacement** as part of urban renewal and revitalization efforts. Some residents and stakeholders view urban renewal activity as a threat to affordable housing and neighborhoods that have historically housed people of color. The city should be proactive with future urban renewal activities to ensure urban renewal does not result in displacement of low income residents, residents of color, and cultural enclaves;
- **Address gaps in economic opportunity** by lowering concentrated poverty and improving access of African American and Hispanic children to high quality schools; and
- **Improve access to public transit and parks** for underserved areas and residents, including persons with disabilities.

MAPS 4 and fair housing. The recently approved MAPS 4 initiative will be instrumental in addressing barriers. Many MAPS 4 priorities—e.g., developing 500 new ADA-accessible bus shelters—will address some of the barriers identified in this report.

Implementation of MAPS 4 should be viewed through an equity lens and consider the barriers identified in this study. For example, the \$87 million in funds to transform the public transit system should prioritize expanding access to low income households and families and improve the effectiveness of para- and accessible transit. Similarly, investments in sidewalks and placemaking should improve equitable distribution of parks and trails, including accessibility improvements, and yet be mindful of the risk of stimulating market investment that leads to gentrification.

Current Impediments and Fair Housing Action Items

This section details the current impediments to fair housing choice and outlines a recommended set of action items to address the impediments.

Impediment No. 1—Homeownership barriers.

African American, Hispanic, and Native American households find it more difficult to access credit to purchase homes, refinance existing mortgage loans, and/or improve their homes. African American borrowers face high denials even after adjusting for income levels, and Hispanic borrowers are more likely to get high-rate loans. These practices not only have the effect of limiting homeownership opportunities, they also negatively affect housing conditions in certain neighborhoods and perpetuate inequities caused by historic discrimination.

As the city's market has improved, speculative purchases have raised the cost of entry-level ownership housing and property taxes.

Action steps:

- Monitor HMDA data on mortgage loan denials and subprime lending activity including the disproportionate impact on minority borrowers. Fund education and outreach to teach vulnerable residents how to avoid predatory lending, rent to own scams, and high-risk loans.
- Eliminate rezoning requirements for homeownership developments and land trust communities that add affordable products through gentle infill.
- Integrate land trusts into redevelopment activities to mitigate resident displacement and expand affordable homeownership options. While several land trust models exist nationally, the common element is that the land trust retains ownership of the land, thus buying down the cost of homeownership by taking expensive land values out of the equation. The Lowry neighborhood in Denver, a major urban

redevelopment/urban infill project, integrated land trust homes into the new neighborhood to expand homeownership across the income spectrum.¹

- Fast track approval of affordable housing developments. Waive, discount, or defer fees for affordable housing, with greater discounts for deeper levels of affordability. Consider exempting affordable units from property taxes.
- Ensure that city-funded rental and ownership developments built in high opportunity areas exercise affirmative marketing to encourage applications from racial and ethnic minorities living in areas of concentrated poverty.

Impediment No. 2—Discrimination in rental transactions and lack of affordable rental and accessible housing.

The city's shortage of affordable rental options disproportionately affects residents with low incomes who include racial and ethnic minorities, single mothers, residents with disabilities, residents with mental health challenges, and residents with substance abuse challenges. These residents are very vulnerable to being denied housing, being evicted, facing challenges finding housing near quality schools, facing challenges finding accessible and affordable housing, and falling into homelessness—all of which are outcomes that negatively affect the public sector.

Action steps:

- Prioritize city funding to greatly expand the number of affordable housing units with supportive services to serve households who are most vulnerable to discrimination, evictions, and homelessness.
- Fund nonprofit legal representation for renters in the process of eviction to negotiate solutions other than eviction and avoid homelessness. Connect city code enforcement officers with nonprofit legal representation to help negotiate improvements to rental properties without eviction threats.
- Improve the city inspection process for accessibility requirements of the Fair Housing Act to ensure that developers are creating accessible units.
- Consider funding a local program similar to that in Reno, Nevada (administered by Silver State Fair Housing) in which developers are notified of their accessibility requirements at the permitting stage and are regularly inspected during construction.
- Fast track approval of affordable housing developments. Waive, discount, or defer fees for affordable housing, with greater discounts for deeper levels of affordability. Consider exempting affordable units from property taxes.

¹ <https://coloradoclt.org>

- Ensure that city-funded rental and ownership developments built in high opportunity areas exercise affirmative marketing to encourage applications from racial and ethnic minorities living in areas of concentrated poverty.

Impediment No. 3—Lack of understanding of fair housing laws and good tenant practices by residents and fair housing compliance by landlords.

Residents are increasingly reluctant to report fair housing violations for fear of losing their housing and facing retaliation. Fair housing complaints and cases processed by the Metropolitan Fair Housing Council demonstrate a continued need to enhance tenant and landlord fair housing awareness and enforce fair housing laws.

Action steps:

- Continue the commitment to fund the Metropolitan Fair Housing Council to assist residents with fair housing complaints and to conduct fair housing education and training.
- Include fair housing and general housing services on the city's website, including links to the Metropolitan Fair Housing Council's webpage and Legal AidOK. A current search for "fair housing" on the city's homepage returned no fair housing information.
- Ensure that outreach and educational announcements are positioned in newspapers and social media sites that are visited and viewed by vulnerable residents. Continue working with neighborhood groups to raise awareness and transmit fair housing rights information.
- Build public understanding, awareness and support for housing affordability, integration, diversity and inclusion. Recruit a public relations firm to donate or discount time to test messaging to residents and landlords and develop a campaign for execution by the Council and city staff. The city already has an excellent webpage with messaging for some areas ("Snow routes & winter weather tips") and could easily rotate a fair housing campaign through its resident messaging efforts.

Impediment No 4—Zoning code and land use regulations discourage housing type diversity.

As detailed in Section III of this report, there are many areas in the city's zoning code that could be improved to facilitate affordability and more housing type diversity.

Action steps:

- Adopt the recommendations from the zoning review in this AI. Briefly, 1) add flexibility to the definition of family; 2) conduct a legal review on potential fair housing challenges associated with treatment of persons with disabilities living in group homes; and, 3) as part of the code update, consider revising densities and development standards to ensure they accommodate a wide range of housing types and products that are typically more affordable and avoid indirect effects of segregating protected classes into certain neighborhoods.

- As part of continued efforts to update the city’s code and add flexibility in residential development consider incorporating the best practices referenced in the zoning review: 1) include a definition of disability consistent with the Federal Fair Housing Act; 2) establish standard processes for reasonable accommodation requests; and 3) allow ADUs and other types of gentle density in some single family districts, potentially in exchange for affordability commitments.

Impediment No. 5—Challenges with affordable and reliable transit access for low income residents and residents with disabilities.

Action steps:

- Assess the results of investments in transit to ensure that they have expanded access in underserved neighborhoods. MAPS 4 should expand transit access to low income households and families and improve the effectiveness of para- and accessible transit.

Impediment No. 6—Limited access to high performing schools for African American and Hispanic students.

Action steps:

- Work with Oklahoma City Public Schools to monitor the results of the P2G transformation on improving access to high performing schools for African American and Hispanic children.
- Continue to invest CDBG public service dollars in afterschool and summer programming and academic activities in low income neighborhoods; increase as resources allow.

SECTION I.

DEMOGRAPHIC PATTERNS

SECTION I.

Demographic Patterns

This section examines demographic patterns that are associated with residential settlement, housing availability and affordability, and access to opportunity. It also provides context for sections that follow—particularly Disproportionate Housing Needs and Access to Opportunity—and informs the identification of Impediments and the Fair Housing Action Plan.

This section follows the framework recommended in the U.S. Department of Housing and Urban Development’s Analysis of Impediments to Fair Housing Choice (AI) guidebook. It also incorporates the most current approach to analyzing the demographic data that are indicative of housing barriers, borrowing in part from the Assessment of Fair Housing (AFH) template.

The core components of this section include:

- An analysis of demographic patterns and trends in Oklahoma City, cities in the broader region, and the peer city of Tulsa;
- An examination of geographic segregation, as well as the racial and ethnic groups that experience the highest levels of segregation, and;
- An identification of racially and ethnically concentrated areas of poverty (R/ECAPs) and the location and predominant protected classes residing in R/ECAPs.

Primary Findings

- African American residents have historically faced the most housing and economic exclusion in the region. This is manifest in the city’s concentrated areas of poverty, which continue to be disproportionately occupied by African American residents. However, recent demographic trends show African Americans moving from traditionally higher poverty areas into more suburban areas with the city.
- Hispanic residents, whose population has increased significantly in recent decades, are increasingly concentrated within the city’s highest poverty areas.
- Oklahoma City has 19 Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs). These are neighborhoods that have a poverty rate of 40 percent and higher, and are more than 50 percent Non-White and Hispanic residents. All of the R/ECAPs in the greater region are located within Oklahoma City’s boundaries.
- Segregation, which has historically been most prominent for African American residents, has decreased modestly since 1990 as measured by the Dissimilarity Index

(DI). Segregation of Asian residents, which has been historically low, has also been declining. In contrast, segregation, as measured by the DI has been increasing for Hispanic residents.

History of Residential Settlement and Segregation

Similar to many cities in the U.S., segregation, income inequality, and differences in access to economic opportunity in Oklahoma City are rooted in historic regulations, policies, and practices. This initial section briefly explores those to set the context for the demographic analysis.

Segregation ordinances and race covenants. Oklahoma City was one of the many Southern and border cities (including Atlanta, Birmingham, Miami, Charleston, Dallas, Louisville, New Orleans, Richmond, and St. Louis) to follow Baltimore City's establishment of segregation ordinances in the early 20th century. In addition to zoning ordinances, racially restrictive covenants were also used to restrict African American homebuyers from buying homes with deed restrictions based on race.

The State of Oklahoma upheld segregation practices even when federal legal standing became dubious: In 1948, the U.S. Supreme Court ruled that the government could not enforce racial clauses in deeds, yet the Oklahoma Supreme Court upheld that White owners could sue seller and buyers for conspiring to diminish property values if a racial covenant was broken.¹

These policies limited residence of African Americans to the neighborhoods of Stoughton, Sandtown, Deep Deuce, and Bricktown. Oklahoma City's African American community thrived in these areas. Bricktown became the site of the city's branch of the National Association for the Advancement of Colored People (NAACP); the home of the *Black Dispatch*—the city's first newspaper written for the city's Black community; and the site of the highly regarded Frederick Douglass High School. The area also had a number of entertainment venues.

The Great Depression, expansion of highways to accommodate automobiles, and urban renewal efforts all disrupted the thriving economy in these neighborhoods. African Americans were displaced to the more suburban east side of the city, which remains an area of African American concentration.

Redlining. The term “redlining” refers to a practice of the Federal Home Owner's Loan Corporation (HOLC), which was established in 1933 to stabilize the housing market. Prior to the HOLC, homeownership was unusual for all but the very wealthy, as lenders required very large downpayments (e.g., 50% of home value), interest only payments with a “balloon” payment at the end of the loan term requiring additional financing, and a loan

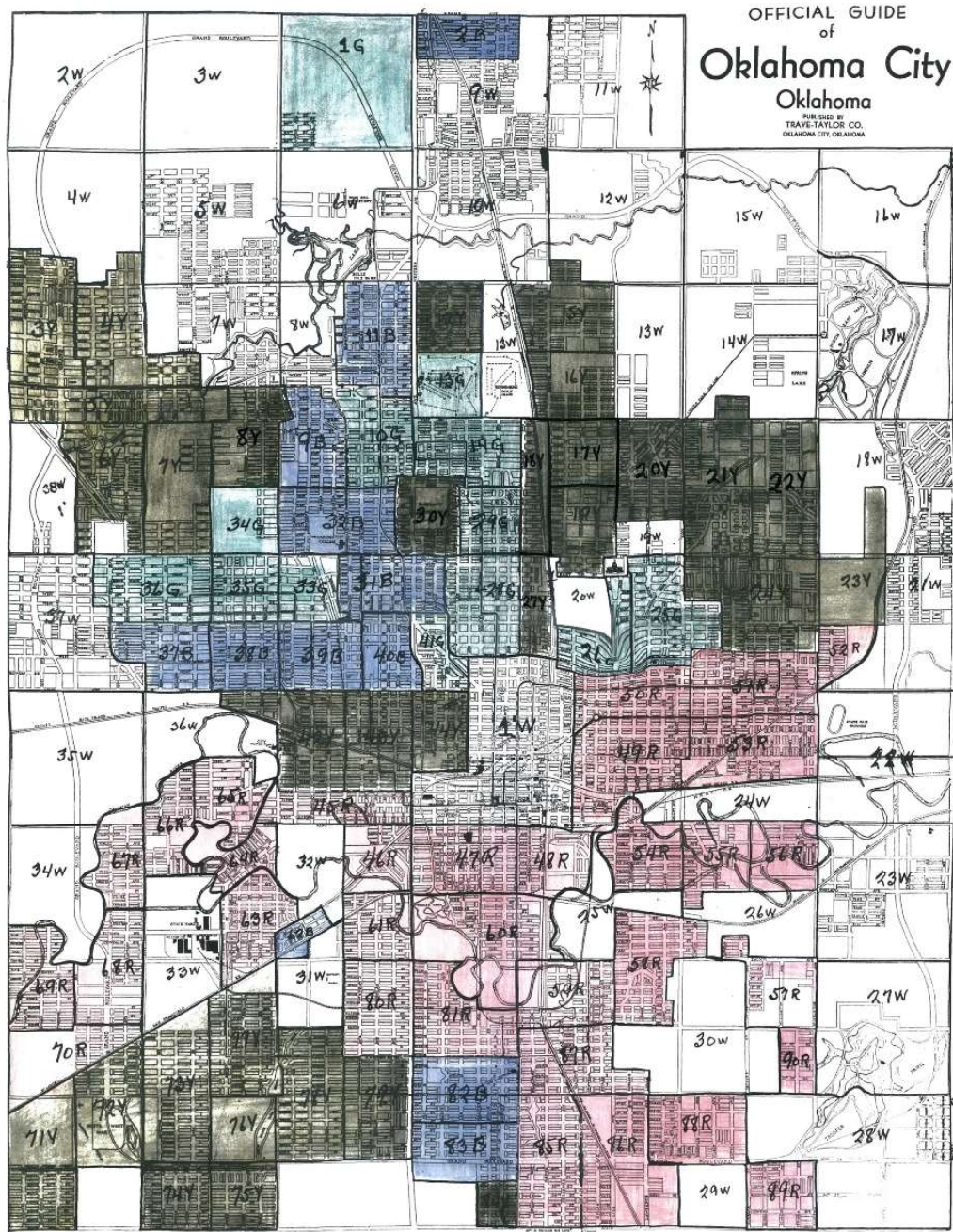
¹ “The Color of Law” Richard Rothstein.

term of just five to seven years. The HOLC offered more reasonable terms, allowing middle and upper middle class households to become owners.

To evaluate loan risk, the HOLC hired local real estate agents to develop maps depicting neighborhood quality, on which loan pricing would be based. Lacking data or historical trends to evaluate risk, these agents employed racial and ethnic prejudice to risk-rate residential blocks and neighborhoods. This not only had the effect of segregating non-White residents into certain areas in cities, it also prevented non-White residents from obtaining ownership by artificially raising the cost of purchasing an inner city home.

An example of redlining in Oklahoma City is shown in the following map, Figure I-1. Teal and dark blue areas were rated lower risk (“best and still desirable”), while dark green and red areas were rated high risk (“declining and hazardous”). It is likely that areas designated hazardous could not receive conventional mortgage loans. The effect of this risk-rating system was to drive capital into higher grade neighborhoods and away from lower grade neighborhoods—and to limit ownership to a select group of residents.

Figure I-1.
Oklahoma City Redlining Map, Date Unknown



Source: Mapping Inequality, University of Richmond's Digital Scholarship Lab, <https://dsl.richmond.edu/panorama/redlining>.

The Federal Housing Administration (FHA), which insures residential mortgages, was formed shortly after the HOLC and continued the federal effort to continue to expand

homeownership for the middle class. This opportunity was effectively only available to White renters, as the FHA underwriting manual instructed against positive risk ratings for neighborhoods with mixed race or social class. The FHA also actively denied lending in urban neighborhoods, favoring lending in suburbs. In effect, the FHA rewarded racial covenants and cut off racial and ethnic minorities from conventional mortgages, denying them America's most successful wealth-building tool: ownership of one's home.

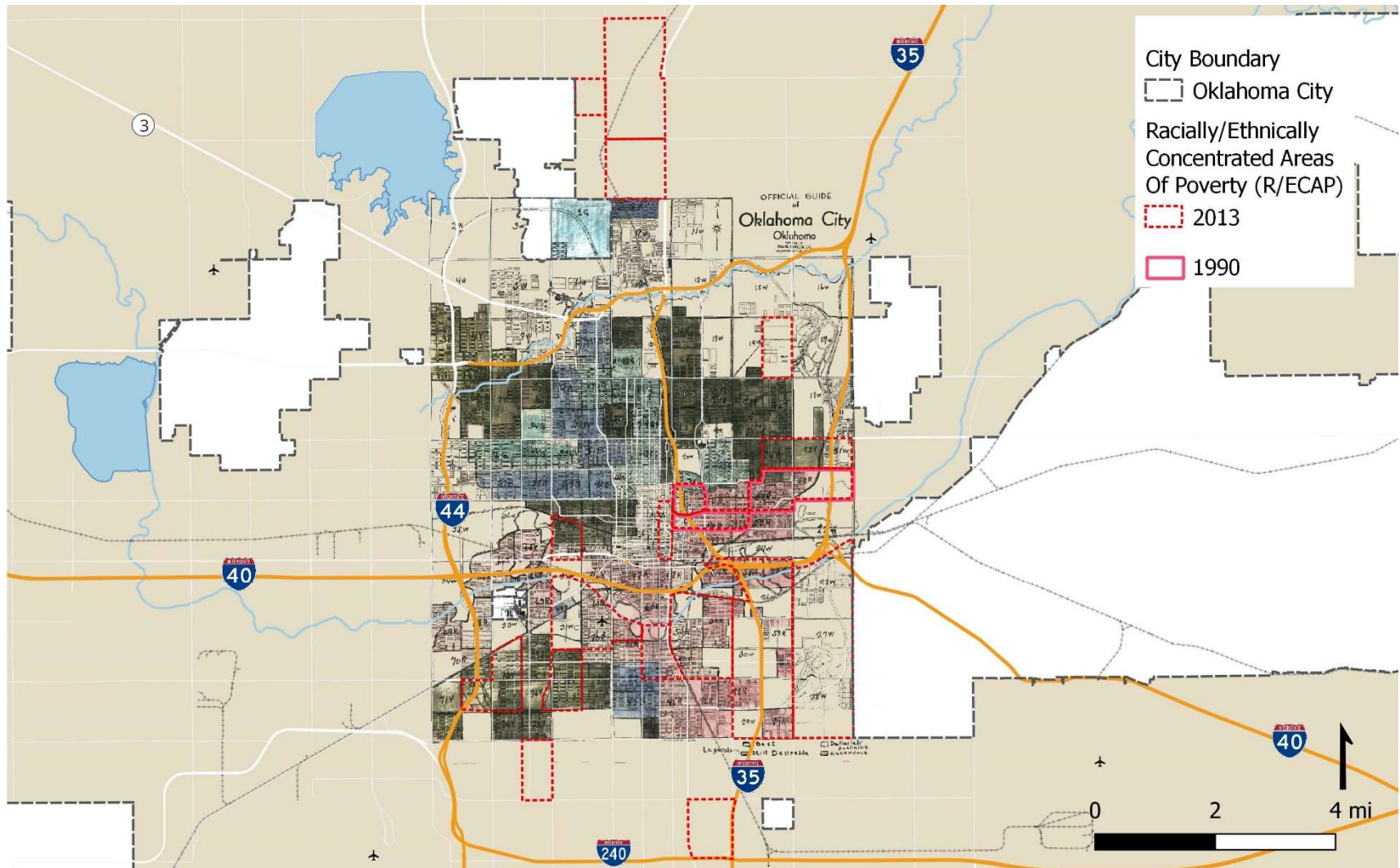
Discrimination in mortgage lending provided an opportunity for predatory lenders to take advantage of would-be minority owners. This took two forms: Predatory lenders convinced White owners to sell at below market prices (often based on threats that minority buyers were moving into the neighborhood) and then offered minority buyers inflated prices with unfavorable lending terms.

Laws prohibiting discrimination in lending were passed in 1974, much later than the prohibition of other discriminatory actions. As such, for decades these restrictions on mortgage lending—mostly for African Americans, immigrants, and women—significantly limited access to economic growth which, in the U.S., is primarily achieved through homeownership.

The map below, Figure I-2, shows the enabling effects of redlining on segregation in Oklahoma City. Areas in a dark red outline are designated "Racially/Ethnically Concentrated Areas of Poverty" or "R/ECAPs" as of 1990—these are neighborhoods with high rates of poverty and more than 50 percent racial and ethnic minorities. In 1990, all R/ECAPs were also areas that had been ranked as "hazardous" by the HOLC. The current R/ECAPs (shown by the dotted red line) include many "hazardous" areas as well as "declining" areas. No R/ECAPs are located in "best" or "still desirable" areas.

In sum, the federal designation of neighborhoods as lower quality perpetuated segregation by intentionally dividing cities across racial and class lines, encouraging White upper and middle income residents to located in "approved" neighborhoods and discouraging private sector investment in "unapproved" neighborhoods. As demonstrated throughout this section, these divisions persist today.

Figure I-2.
Racially and Ethnically Concentrated Areas of Poverty (R/ECAP) and Historic Redlining



Source: HUD AFFH Raw Data, February 2018, and Mapping Inequality, University of Richmond's Digital Scholarship Lab, <https://dsl.richmond.edu/panorama/redlining>.

Demographic Context

The city of Oklahoma City is the capital of Oklahoma and is located in the center of the state. The city is surrounded by several municipalities, including Norman to the south, home to Oklahoma University, the largest institution of higher education in the state. For Norman and other cities in the HUD-defined Oklahoma City region (the CBSA), comparative data are provided in this and other AI sections. Tulsa—the second most populous city in Oklahoma—shares many characteristics of Oklahoma City and is also included as a comparative city. Enid, Lawton, and Shawnee are not included in comparative analyses except where relevant (R/ECAP analysis) due to their distance from Oklahoma City and relatively small size.

Figure I-3.
Oklahoma City and Peer Cities in Analysis



Source: Root Policy Research.

As demonstrated in the figure below, Oklahoma City's population grew by 43 percent between 1990 and 2018, an increase of 192,565 persons. This growth was much lower than nearby Edmond, but much higher than Tulsa. As of 2018, Oklahoma City contained 16 percent of all residents in the state, up from 14 percent in 1990. Oklahoma City is by far the largest city in the state; the second largest city, Tulsa, trails by more than 200,000 residents.

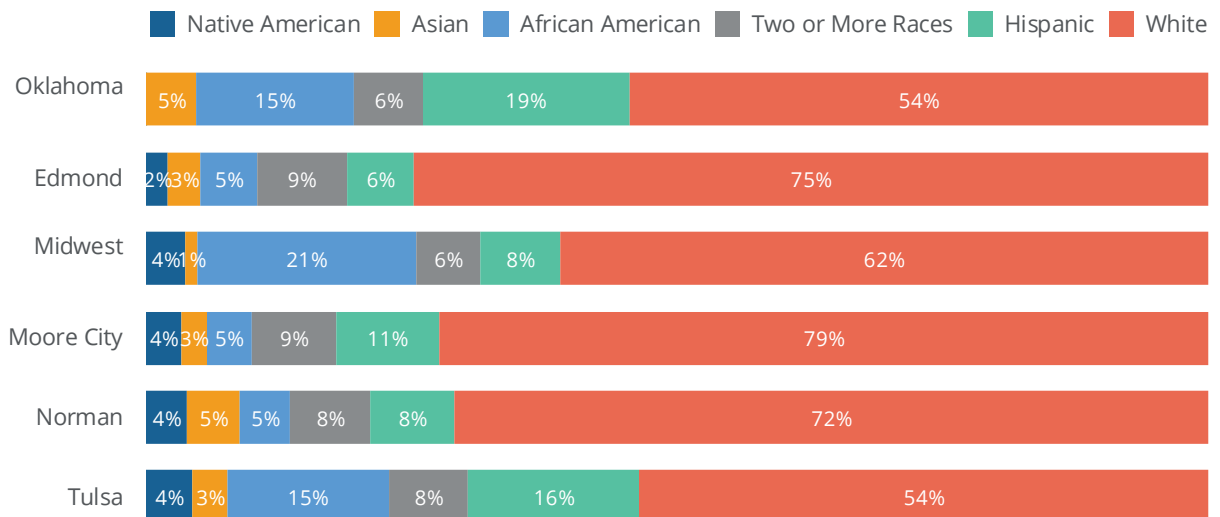
Figure I-4.
Population Change by Jurisdiction, 1990-2018

	1990	2018	Change		Proportion of State	
			Number	Percent	1990	2018
Oklahoma City	444,719	637,284	192,565	43%	14%	16%
Edmond	52,315	91,053	38,738	74%	2%	2%
Midwest City	52,267	57,292	5,025	10%	2%	1%
Moore City	40,318	60,807	20,489	51%	1%	2%
Norman	80,071	121,090	41,019	51%	3%	3%
Tulsa	367,302	402,223	34,921	10%	12%	10%

Source: 2018 ACS 5 year estimates, 1990 Decennial Census

Racial/ethnic distribution differs by jurisdiction, as shown in Figure I-5 below. Oklahoma City and Tulsa are the most diverse racially and ethnically, with 46 percent and 48 percent of their populations, respectively, being Non-White. Only Midwest City has a larger share of African American residents than Oklahoma City.

Figure I-5.
Race and Ethnicity Distribution by Jurisdiction, 2018



Source: 2018 ACS 5 year estimates

Segregation and Integration

The following maps show Oklahoma City's racial and ethnic concentrations geographically, as well as the change in concentrations since 1990, beginning with the distribution of African American residents, and followed by residents of Hispanic descent, Asian residents, Native American residents, and Non-Hispanic White residents.

The spatial analysis reveals, for African Americans:

- African American residents are most likely to live in the east central and northeastern portions of the city and least likely to live west central and northwest.
- With two exceptions, neighborhoods with the highest concentrations of African American residents are not also areas of very high poverty (>40%).
- Between 1990 and 2018, areas around the Medical Center and north of the Capitol experienced significant declines in African American residents.
- Growth in African Americans occurred in the in the far northwest, southwest, and southeast.

Notable is the nearly inverse relationship between African American and White population change. For Non-Hispanic White residents, population growth has occurred in the central part of the city. Declines or stabilization of Non-Hispanic White residents has occurred outside of central Oklahoma City.

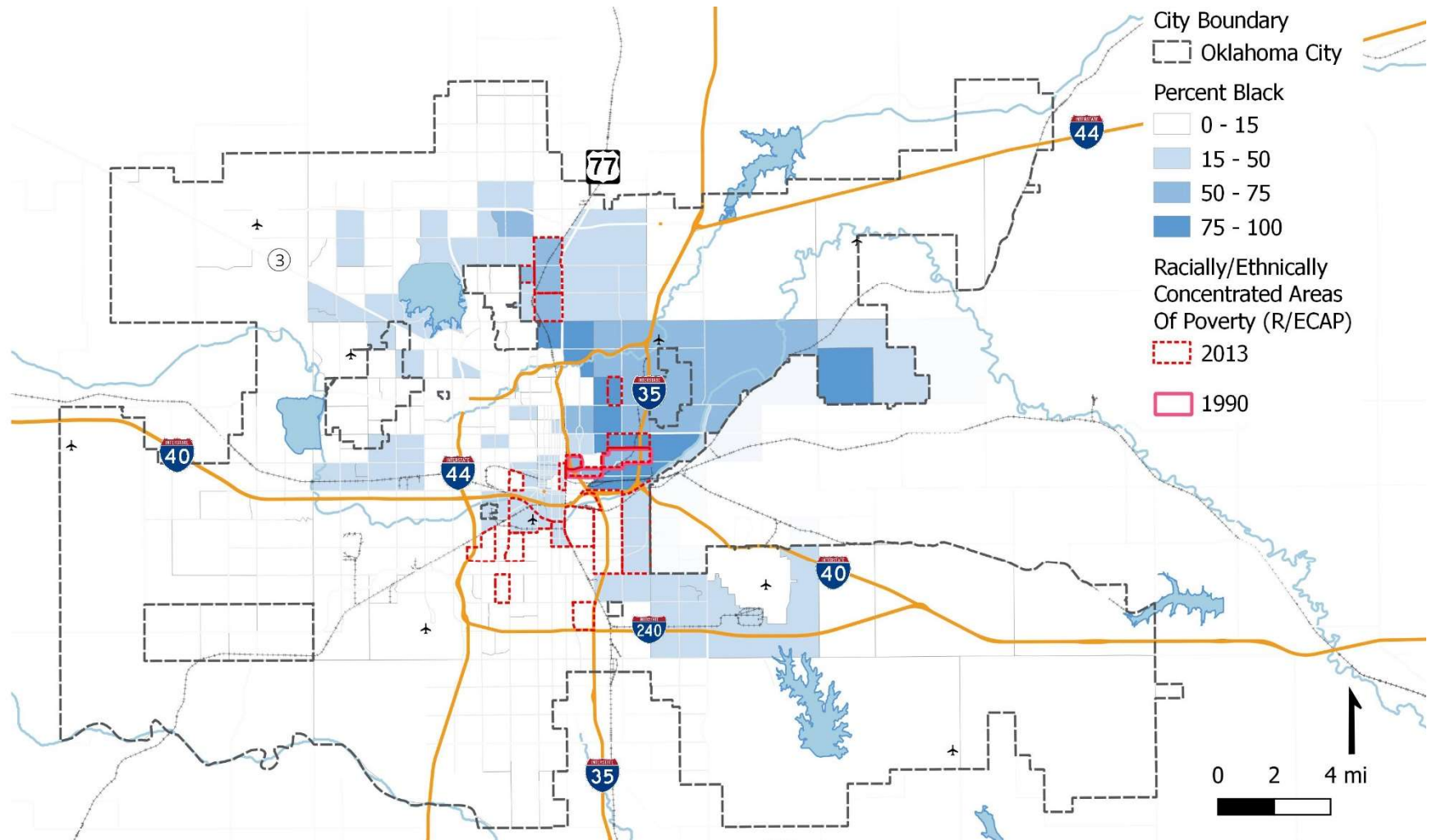
The spatial analysis reveals, for residents of Hispanic descent:

- Residents of Hispanic descent are most likely to live in the southeastern portion of the city.
- Unlike African Americans, for Hispanic residents, the neighborhoods where concentration is the highest are also areas of concentrated poverty.
- High growth areas are almost exclusively south and southeast of downtown, with population declines in outlying areas and near the Medical Center.

Patterns of population change for Asian residents differ than those of other groups, especially Hispanic residents, with growth in the outlying areas and decline or stabilization south of downtown, including-poverty-concentrated areas.

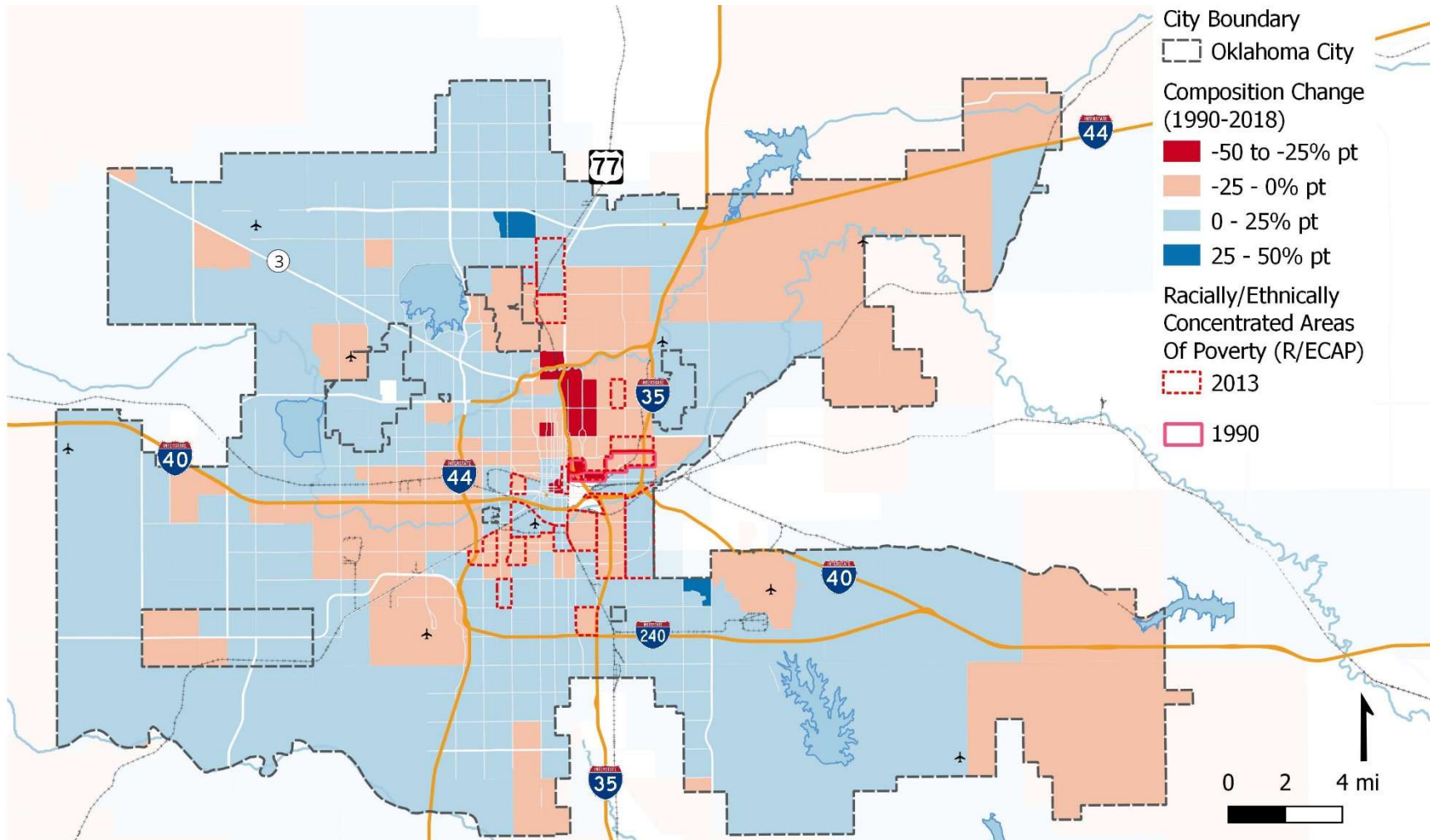
Residential distribution and patterns of change for Native Americans are less distinct. Native Americans live throughout the city with no strong areas of population growth or decline.

Figure I-6.
Percent African American by Census Tract, 2018



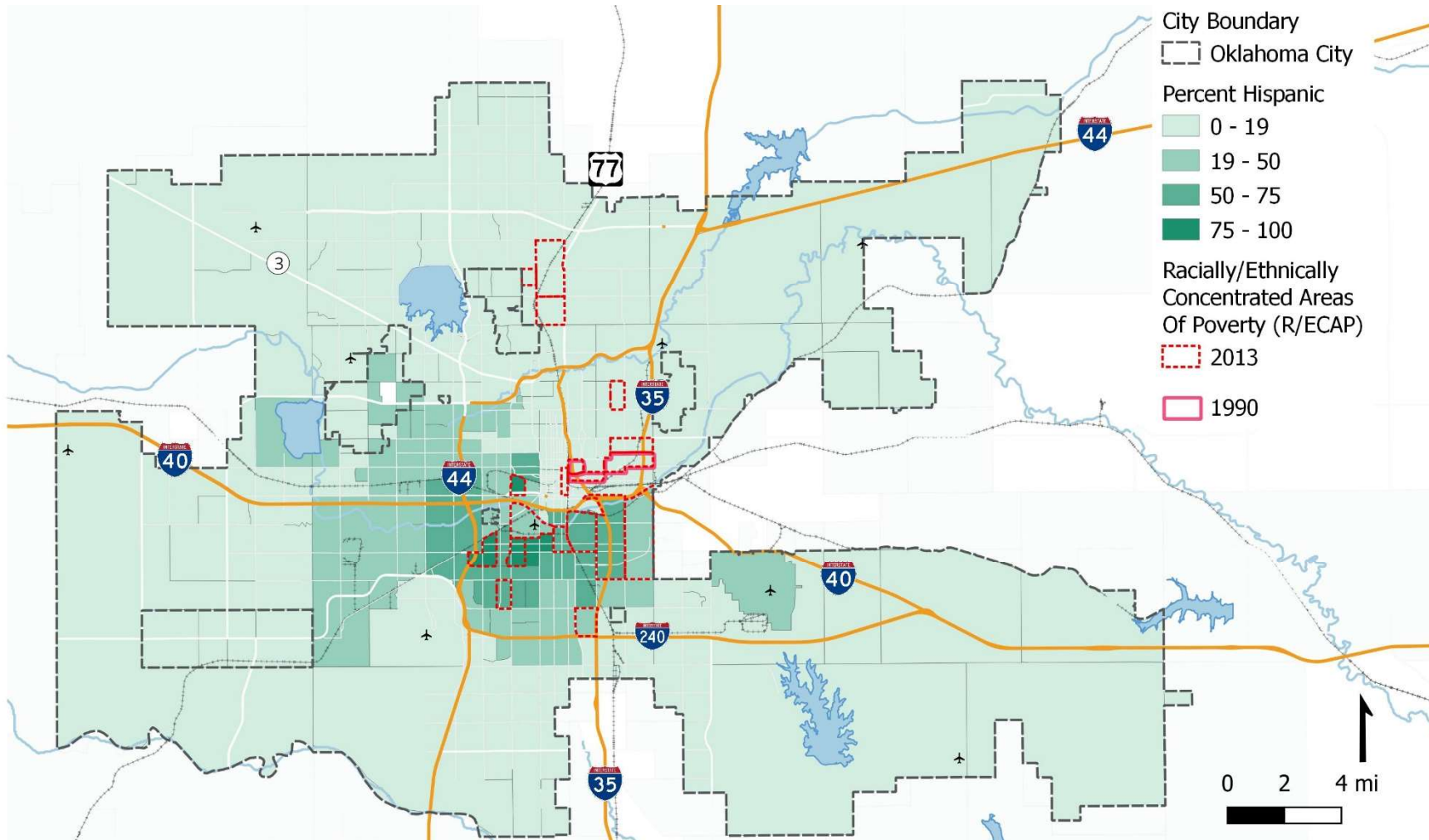
Source: 2018 ACS 5 year estimates

Figure I-7.
Percentage Point Change in Percent African American by Census Tract, 1990-2018



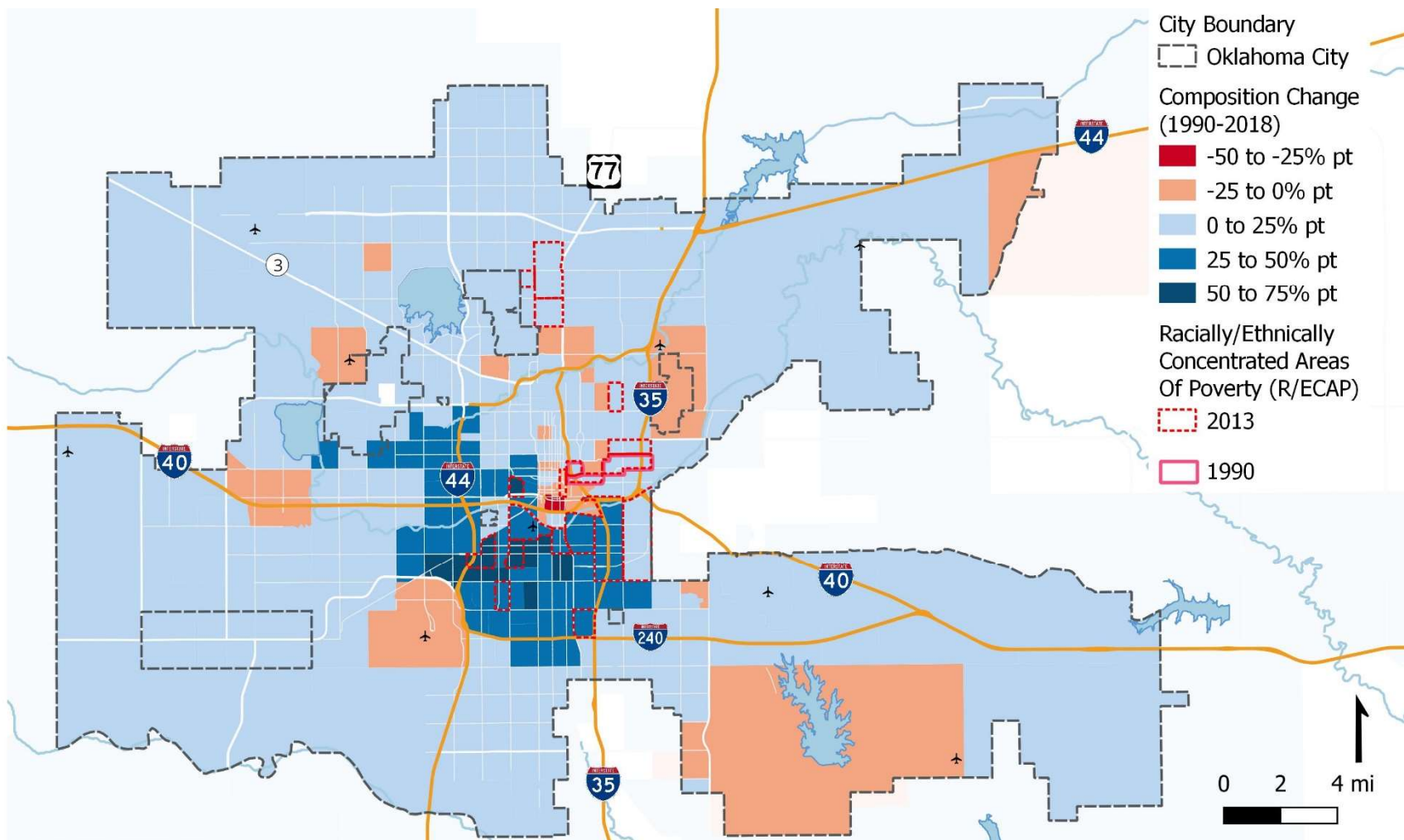
Source: 2018 ACS 5 year estimates, HUD AFFH Raw Data, February 2018.

Figure I-8.
Percent Hispanic by Census Tract, 2018



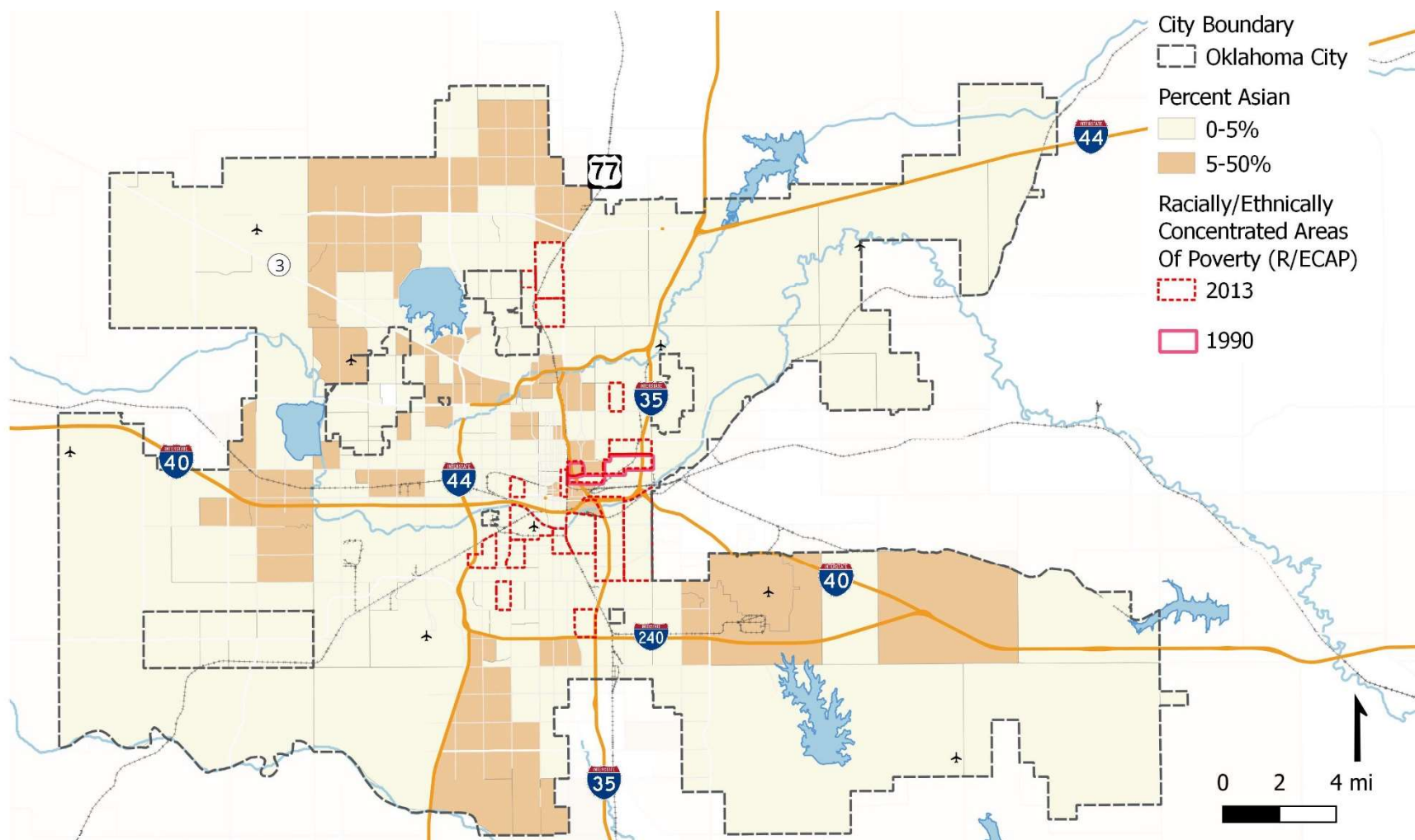
Source: 2018 5 year estimates, HUD AFFH Raw Data, February 2018

Figure I-9.
Percentage Point Change in Percent Hispanic by Census Tract, 1990-2018



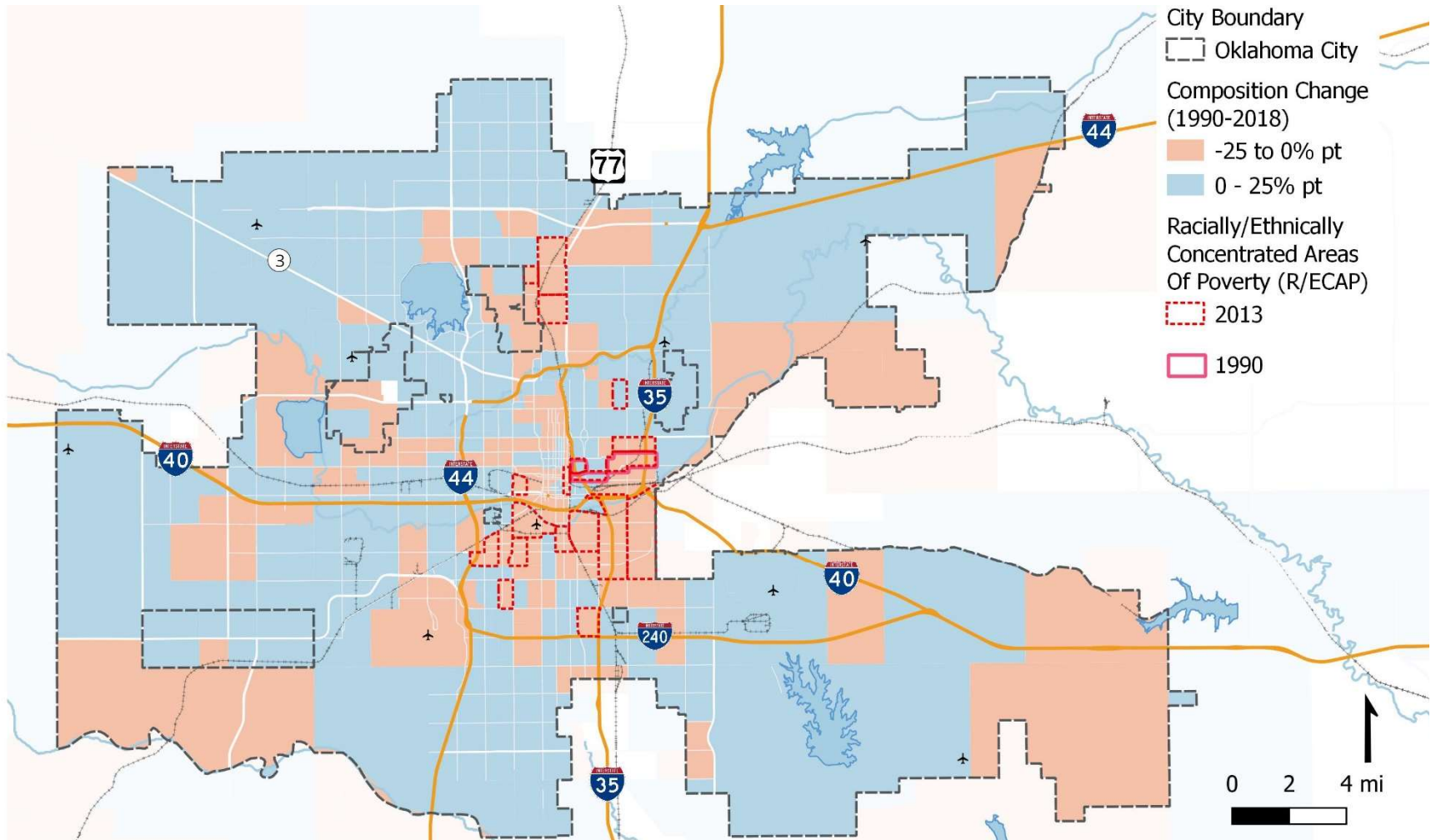
Source: 2018 ACS 5 year estimates, HUD AFFH Raw Data, February 2018.

Figure I-10.
Percent Asian by Census Tract, 2018



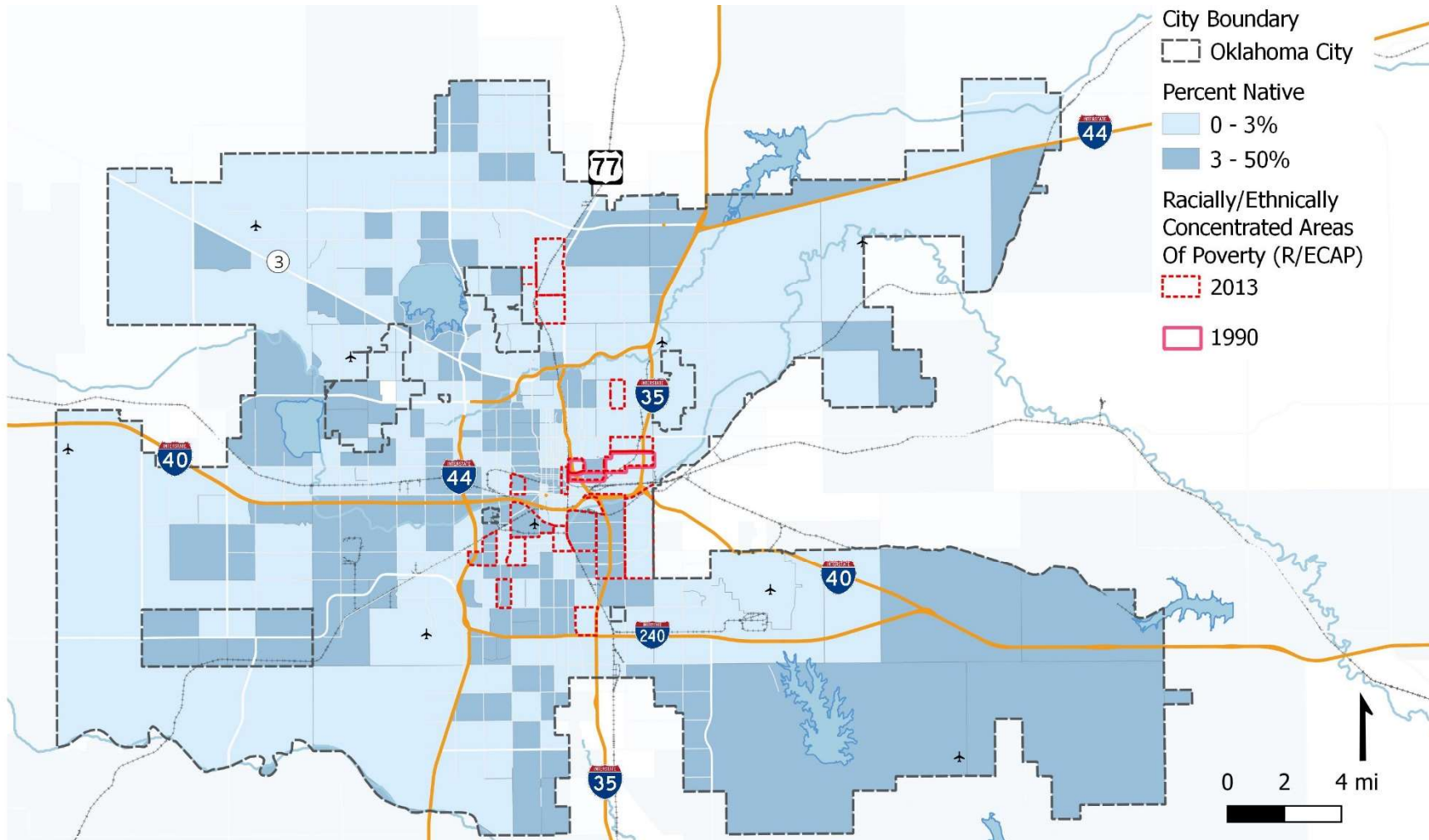
Source: 2018 ACS 5 year estimates, HUD AFFH Raw Data, February 2018.

Figure I-11.
Percentage Point Change in Percent Asian by Census Tract, 1990-2018



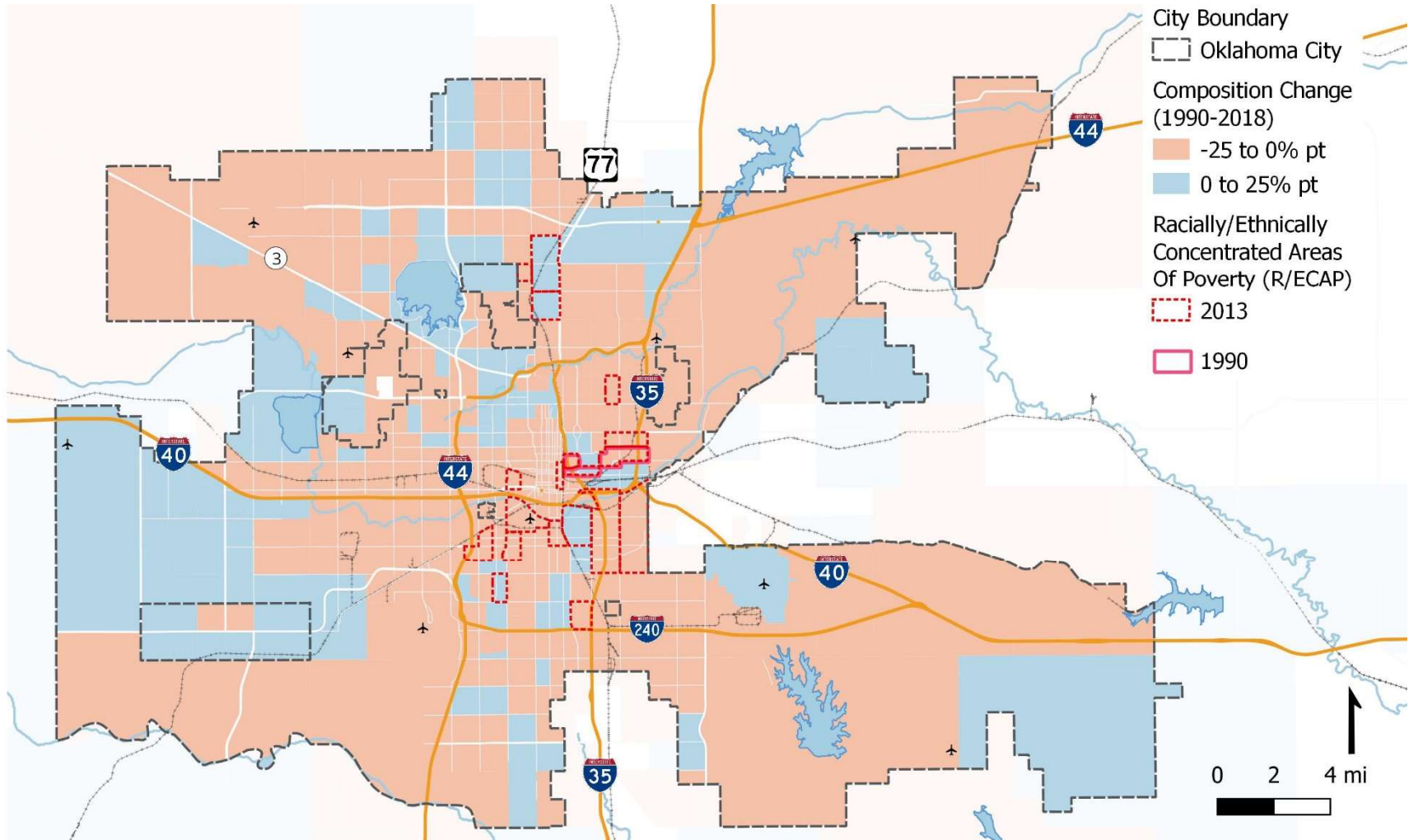
Source: 2018 ACS 5 year estimates, HUD AFFH Raw Data, February 2018.

Figure I-12.
Percent Native American by Census Tract, 2018



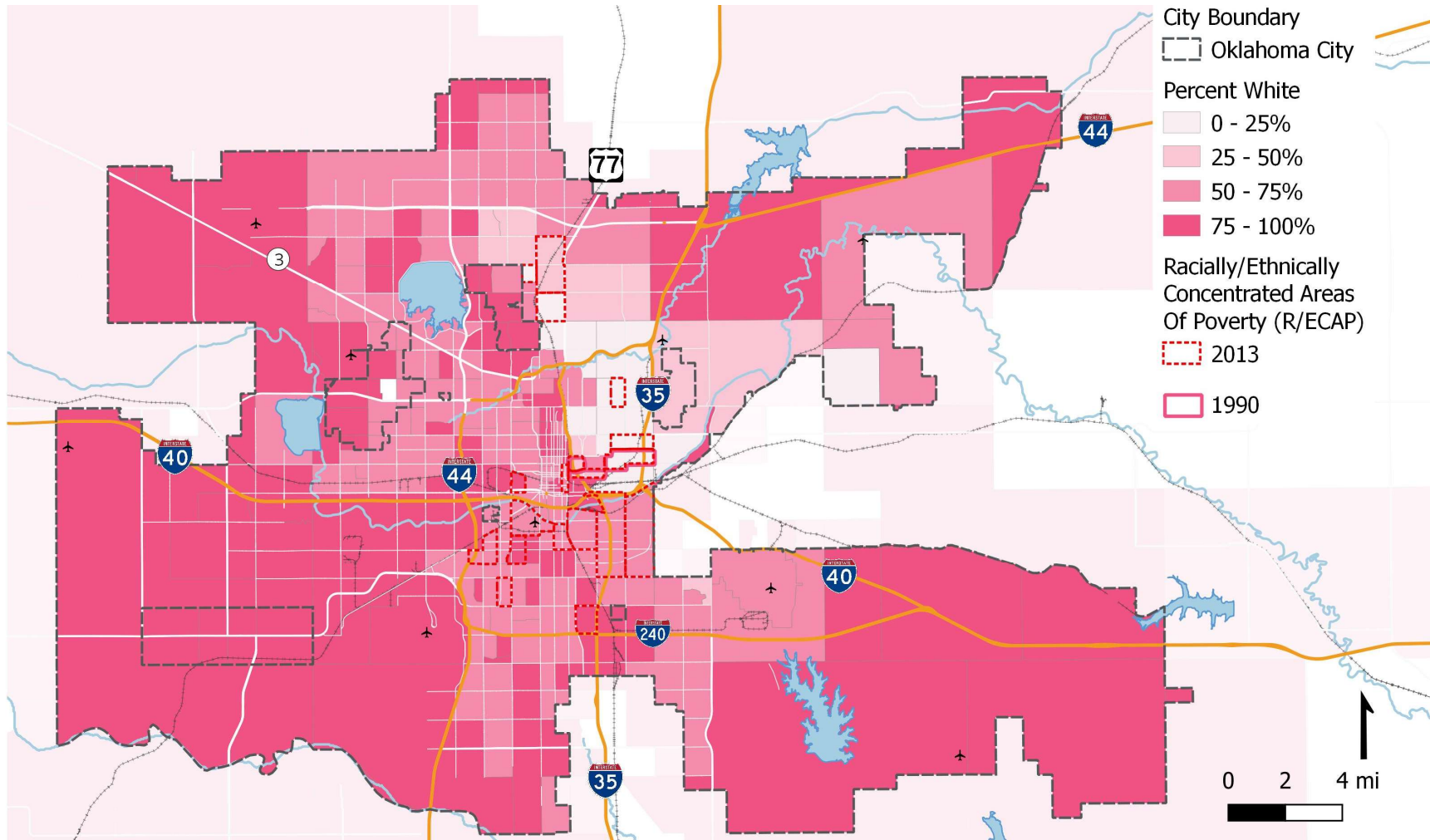
Source: 2018 ACS 5 year estimates, HUD AFFH Raw Data, February 2018.

Figure I-13.
Percentage Point Change in Percent Native American by Census Tract, 1990-2018



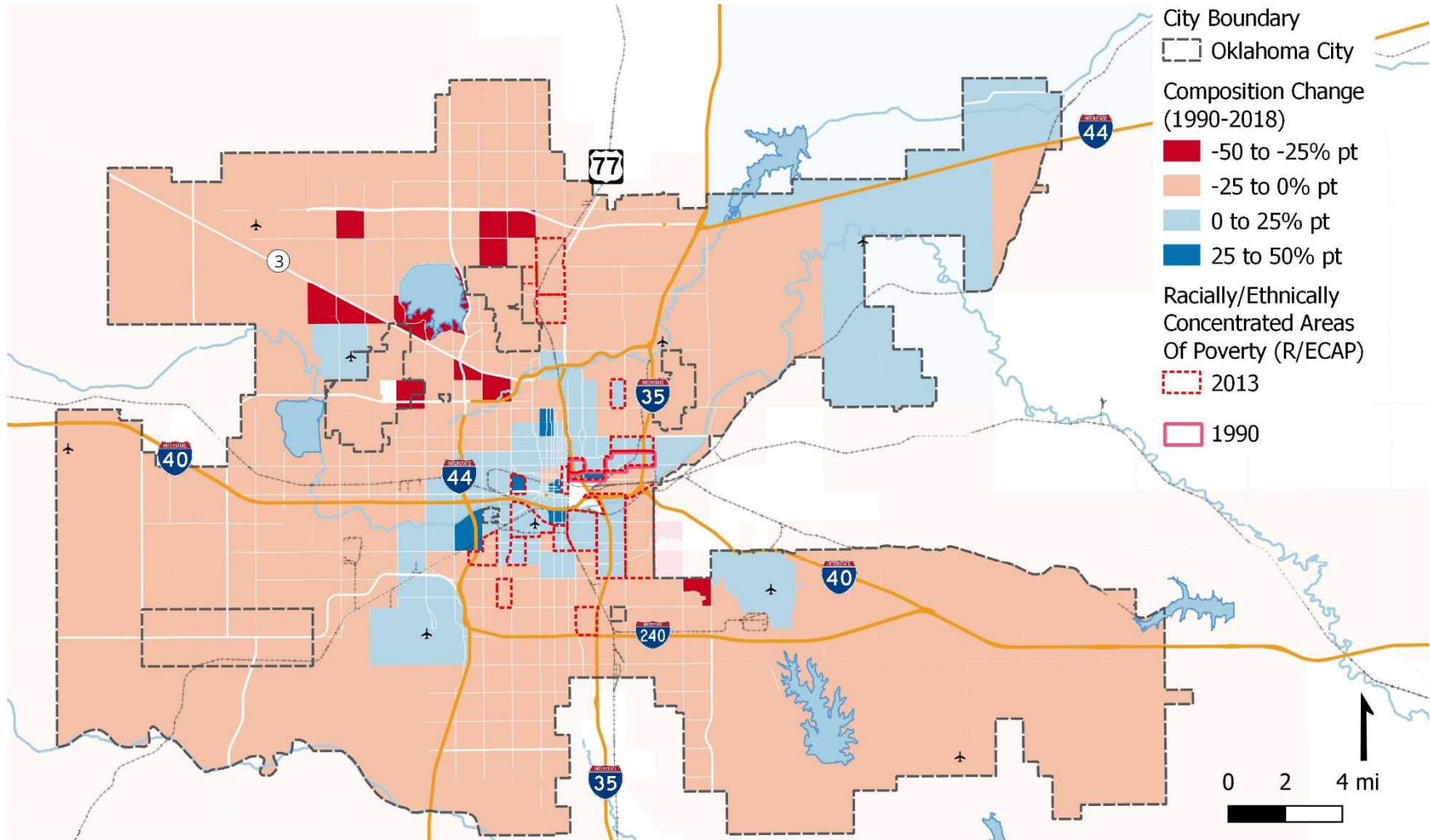
Source: 2018 ACS 5 year estimates, HUD AFFH Raw Data, February 2018

Figure I-14.
Percent White by Census Tract, 2018



Source: 2018 ACS 5 year estimates, HUD AFFH Raw Data, February 2018.

Figure I-15.
Percentage Point Change in Percent White by Census Tract, 1990-2018



Source: 2018 ACS 5 year estimates, HUD AFFH Raw Data, February 2018.

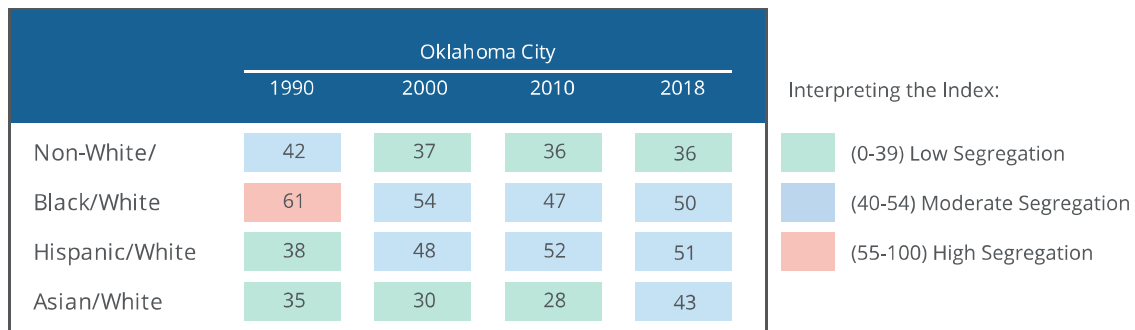
Severity of segregation. A common measure of segregation used in fair housing studies is the dissimilarity index (DI). The DI measures the degree to which two distinct groups are evenly distributed across a geographic area, usually a metropolitan area or county. DI values range from 0 to 100—where 0 is perfect integration and 100 is complete segregation. The DI represents a “score” where values between 0 and 39 indicate low segregation, values between 40 and 54 indicate moderate segregation, and values between 55 and 100 indicate high levels of segregation.

Like all indices, the DI has some weaknesses: First, the DI provided by HUD uses Non-Hispanic White residents as the primary comparison group. That is, all DI values compare racial and ethnic groups against the distribution of Non-Hispanic White residents.

Another limitation of the DI is that it can conceal practices that lead to racial and ethnic exclusion. Communities without much diversity typically have very low dissimilarity indices, while counties with the most diversity will show high levels of dissimilarity. Thus, a “low” dissimilarity index for a jurisdiction is not always a positive if it indicates that racial and ethnic minorities face barriers to entry in a community. These limitations are not significant for this study but are noted in the event that the city’s DI is used to evaluate segregation against peer cities.

Figure I-16 shows trends in DI for Oklahoma City. For Non-White residents overall, the DI has declined since 1990 and is now “low.” This is largely a factor of decline in the DI for Black/African American residents, which was “high” in 1990 and is now moderate, yet increasing. Hispanic/White segregation has been increasing, and is approaching a high segregation level. Asian segregation has also increased since 2010 after being stable.

Figure I-16.
Regional Dissimilarity Index Trends, 1990 - 2018



Note: 2018 Dissimilarity Index calculated by Root Policy research using methods that vary slightly from previous HUD calculations. Partial Census tracts are not weighted.

Source: HUD AFFH Raw Data, February 2018.

Figure I-17 graphically represents these trends.

Figure I-17.
Oklahoma City
Dissimilarity Index
Trends, 1990 - 2018

Note: 2018 Dissimilarity Index calculated by Root Policy research using methods that vary slightly from previous HUD calculations.
 Source:
 HUD AFFH Raw Data, February 2018, 2018 ACS 5 year estimates

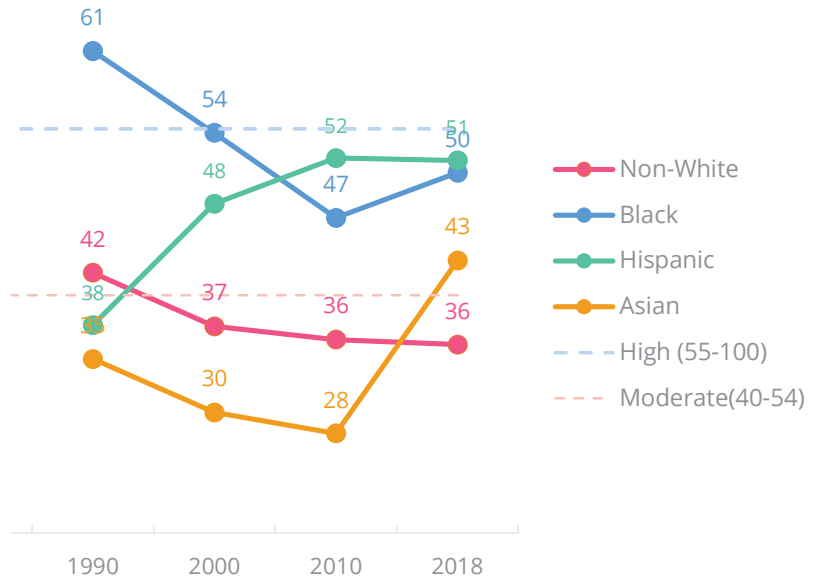
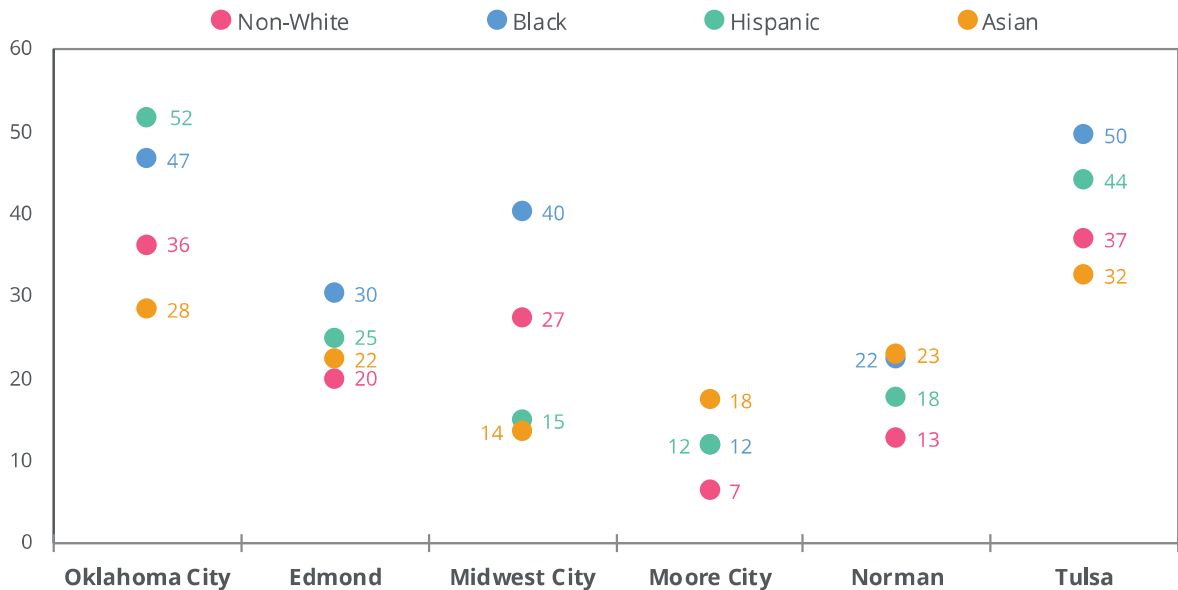


Figure I-18 compares the DI to other cities in the region, and to Tulsa. Compared to Tulsa, Oklahoma City's Hispanic residents are more segregated, and Black/African Americans are similarly segregated, as measured by the DI. Segregation is lowest in Moore City and Norman and moderately low in Edmond.

Figure I-18.
Dissimilarity Index by Jurisdiction, 2010



Source: HUD AFFH Raw Data, 2010.

Economic Segregation

A critical aspect of expanding economic opportunity is addressing economic segregation. A growing body of research has consistently found that reducing economic segregation, especially for young children, has long-term, positive outcomes for families, and decreases the public sector costs of addressing the consequences of poverty.

Overall, the poverty rate of Oklahoma city is 17 percent. Figure I-19 compares the overall, youth, and older adult poverty rates of Oklahoma City to peer cities and Tulsa. Oklahoma City's poverty rate for children is relatively high.

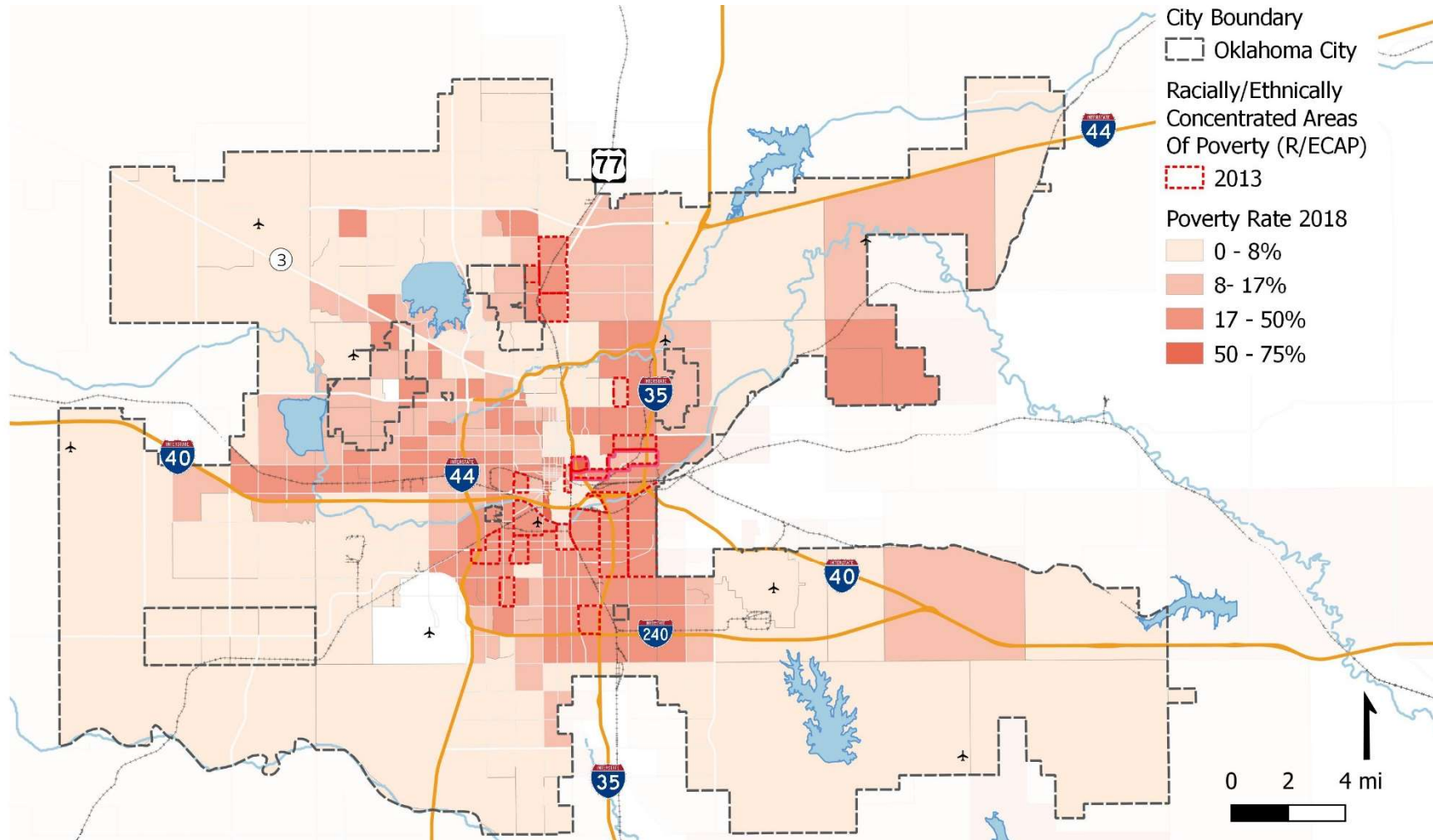
Figure I-19.
Poverty Rates, 2018

Source:
2018 ACS 5 year estimates.

	Total	0 to 18 yrs	65 yrs and Older
Oklahoma City	17%	25%	15%
Edmond	11%	13%	6%
Midwest City	15%	23%	13%
Moore City	9%	11%	16%
Norman	18%	17%	10%
Tulsa	20%	30%	15%

The map in Figure I-20 reveals that poverty is concentrated in census tracts in a crescent around the central business district below Interstate 40 and East of Interstate 235 as well as in the neighborhoods in and surrounding the industrial areas that flank Interstate 35 to Interstate 240 and north of Interstate 40 west of downtown. Other areas of concentrated poverty are more scattered throughout the northwest quadrant of the city. There is also a concentration in the areas to the west of Highway 77 in the north of the city and to the east in more rural areas near Spencer, north of Midwest City.

Figure I-20.
Poverty by Census Tract, 2018



Source: 2018 ACS 5 year estimates

Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

HUD has developed a framework to examine economic opportunity at the neighborhood level, with a focus on racial and ethnic minorities. That focus is related to the history racial and ethnic segregation, which, as discussed in the beginning of this section, often limited economic opportunity.

“Racially or ethnically concentrated areas of poverty,” also known as R/ECAPs, are neighborhoods in which there are both racial concentrations and high poverty rates.

HUD’s definition of an R/ECAP is:

- A census tract that has a non-white population of 50 percent or more (majority-minority) or, for non-urban areas, 20 percent, and a poverty rate of 40 percent or more; of
- A census tract that has a non-white population of 50 percent or more (majority-minority) and the poverty rate is three times the average tract poverty rate for the county, whichever is lower.

Why R/ECAPs matter. The 40 percent poverty threshold used in the R/ECAP definition is based on research identifying this to be the point at which an area becomes socially and economically dysfunctional. Conversely, research has shown that areas with up to 14 percent of poverty have no noticeable effect on community opportunity.²

Households within R/ECAP tracts frequently represent the most disadvantaged households within a community and often face a multitude of housing challenges. By definition, a significant number of R/ECAP households are financially burdened, which severely limits housing choice and mobility. The added possibility of racial or ethnic discrimination creates a situation where R/ECAP households are likely more susceptible to discriminatory practices in the housing market. Additionally, due to financial constraints and/or lack of knowledge (e.g., limited non-English information and materials), R/ECAP households encountering discrimination may believe they have little or no recourse, further exacerbating the situation.

It is very important to note that many R/ECAPs, while not economically wealthy, are rich in culture, diversity, and community. R/ECAPs are not meant to cast broad judgments on an area, but rather to identify areas where residents may have historically faced discrimination and continue to be challenged by limited economic opportunity.

² The Costs of Concentrated Poverty: Neighborhood Property Markets and the Dynamics of Decline.” In Nicolas P. Retsinas and Eric S. Belsky, eds., *Revisiting Rental Housing: Policies, Programs, and Priorities*. Washington, DC: Brookings Institution, 116–9.

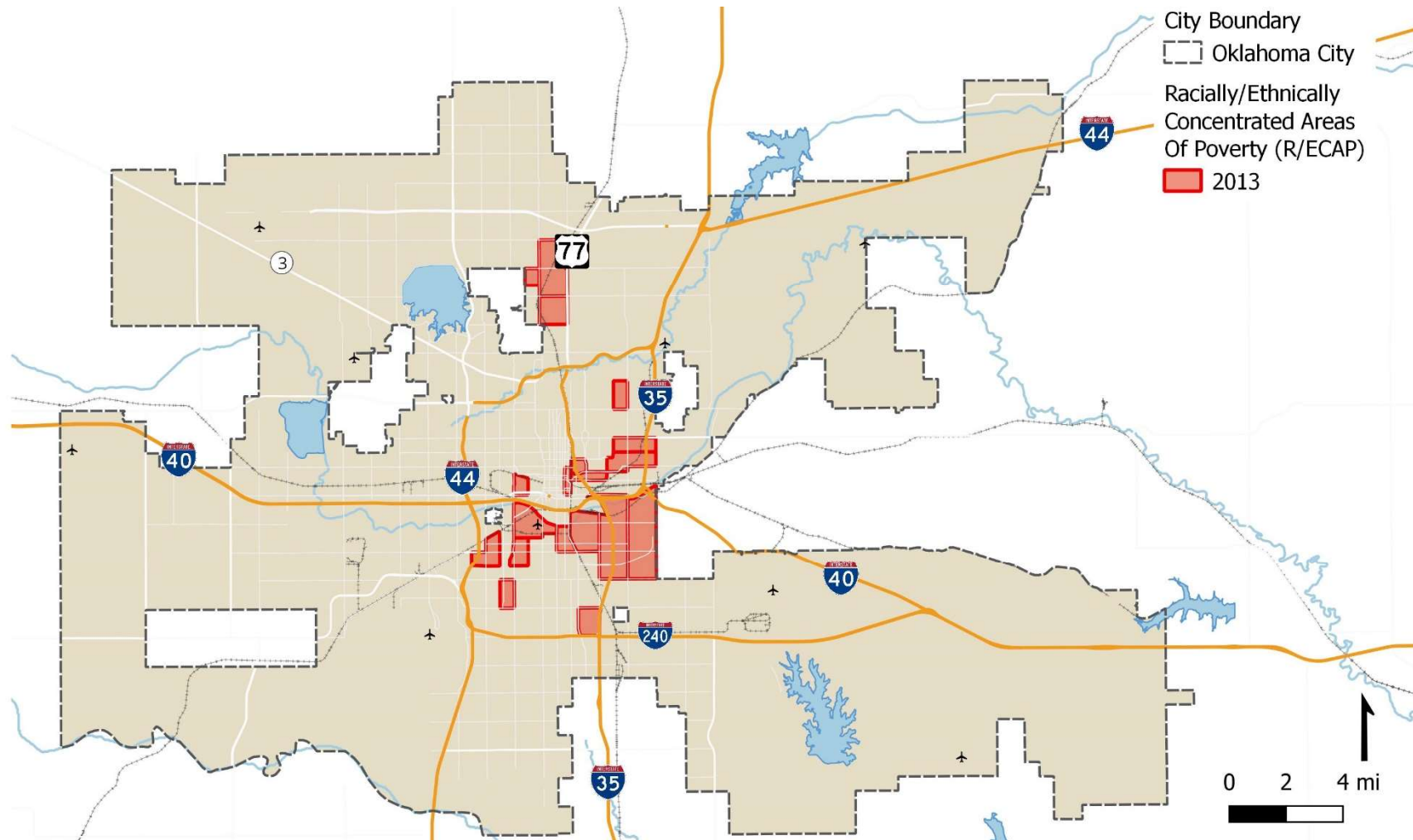
R/ECAP trends. According to HUD's current R/ECAP designations, there are 19 R/ECAP designated census tracts in Oklahoma City. All of the R/ECAP areas in the broader region are within city boundaries.

The map in Figure I-21 reveals that many of the R/ECAP tracts are clustered around the downtown area, directly to the south and northeast. There is also a cluster of tracts to the further from the CBD, north along Highway 77.

The number of R/ECAPs has increased significantly since 1990 when the total number of designated tracts was only three. The number of R/ECAP census tracts grew to five in 2000, 14 in 2010, and currently total 19. Figure I-21 shows the location of the R/ECAP designated tracts over this time period. The maps reveal that while racially and ethnically concentrated poverty was initially confined to a contiguous set of neighborhoods in and around the CBD, R/ECAPs developed in several new clustered and have expanded in those areas since.

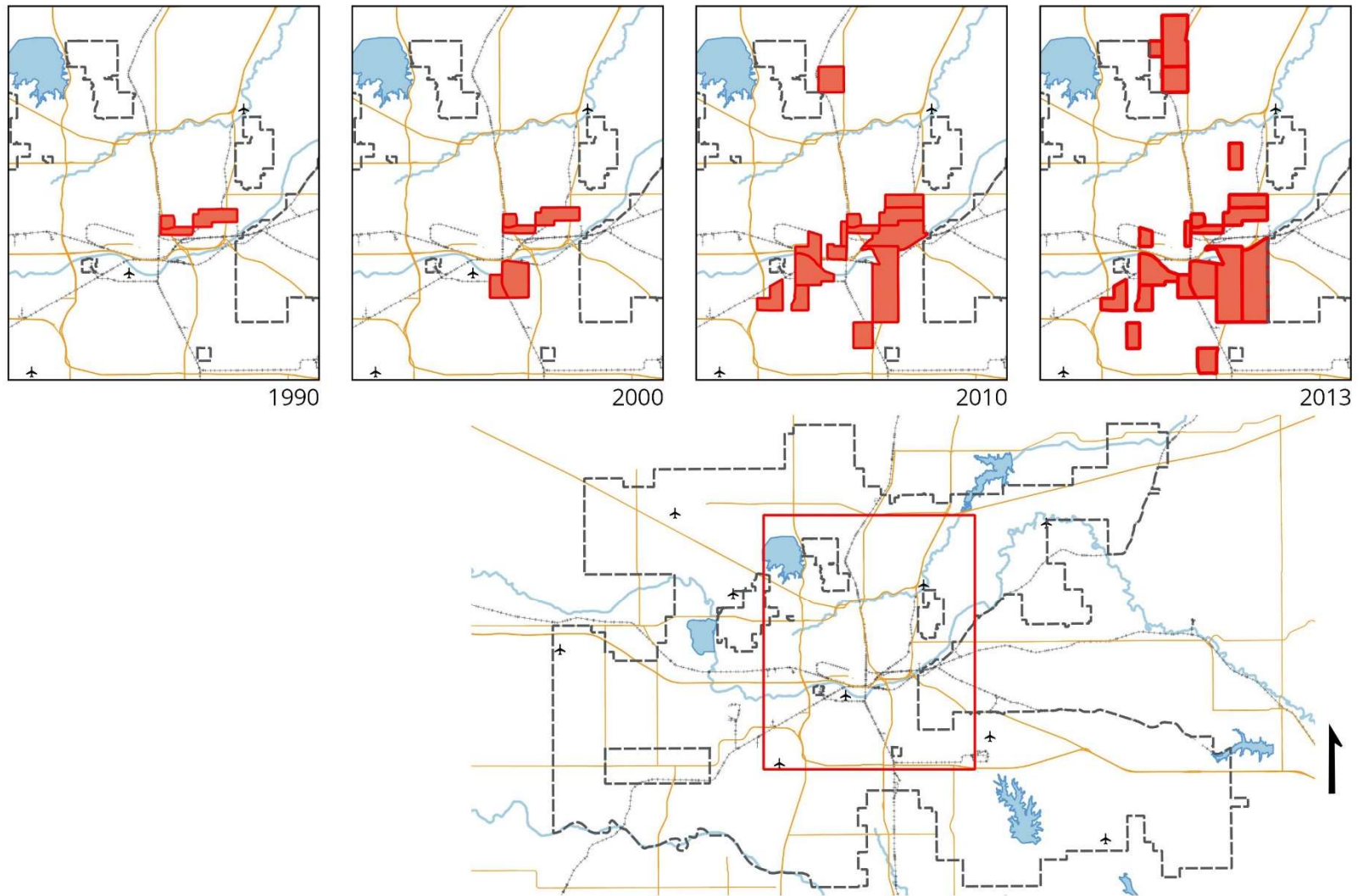
Comparing these geographic trends to the racial concentration trends, the 1990s R/ECAP tracts near downtown had higher concentrations of African American residents at the time but, since then, African American resident concentrations have declined as they have migrated into more suburban areas in the city. In several cases, these declines have exceeded 50 percent. Tracts that became R/ECAP designated tracts after 1990 have had relatively consistent racial and ethnic concentrations. The rise of R/ECAP designated tracts south of Interstate 40 coincide with the growth in the concentration of Hispanic residents since 1990.

Figure I-21.
Racially and Ethnically Concentrated Areas of Poverty, 2013



Source: HUD AFFH Raw Data, February 2018.

Figure I-22.
Racially and Ethnically Concentrated Areas of Poverty, 1990, 2000, 2010, and 2013



Source: HUD AFFH Raw Data, February 2018.

Characteristics of R/ECAPs. More than 40,000 residents of Oklahoma City live in R/ECAP areas. There are nearly 10,000 families living in R/ECAP designated areas and over half of those families are families with children. Overall, the Hispanic residents represent the highest proportion of residents in R/ECAP designated tracts (36%) while African American residents are similarly high (33%). Compared to their racial and ethnic representation in the city overall (15% and 19%, respectively), both African American and Hispanic residents are disproportionately represented in R/ECAPs.

White residents are less represented in R/ECAP designated tracts only constituting under one quarter of the total residents (23%).

Figure I-23 compares the overall R/ECAP demographics of Oklahoma City with the two other cities with R/ECAP designated tracts, Lawton and Tulsa. Compared to these cities, Oklahoma City has both a significantly larger population living in R/ECAPs but also a significantly higher proportion of Hispanic residents living in those areas with (35% compared to 10%). In contrast, Oklahoma City has a much lower representation of African American residents in R/ECAPs than both Lawton and Tulsa.

Figure I-23.
R/ECAP Demographics, Oklahoma City, Lawton, and Tulsa, 2010

	Oklahoma City		Lawton		Tulsa	
	Number	Percent	Number	Percent	Number	Percent
R/ECAP Race/Ethnicity						
Total Population in R/ECAPs	43,281	-	2,050	-	23,110	-
White, Non-Hispanic	10,040	23%	520	25%	5,030	22%
Black, Non-Hispanic	14,369	33%	991	48%	13,404	58%
Hispanic	15,377	36%	213	10%	2,277	10%
Asian or Pacific Islander	280	1%	44	2%	168	1%
Native American	1,424	3%	155	8%	854	4%
Other	33	0%	3	0%	25	0%
R/ECAP Family Type						
Families in R/ECAPs	9,794		472		5,340	
Families with Children	5,379	55%	248	53%	2,742	51%

Note: Lawton is included here because, in addition to Tulsa, it has R/ECAPs. No other entitlement cities in the state have R/ECAPs.

Source: HUD AFFH Raw Data, February 2018

Dissimilarity Index Reference Guide

What is the Dissimilarity Index?

A very common measure of segregation used in fair housing studies is the dissimilarity index (DI). The DI measures the degree to which two distinct groups are evenly distributed across a geographic area, usually a county. The DI uses a mathematical formula that compares the percentage of Non-Hispanic, White residents living in a Census tract to the percentage of minority residents living in that same Census tract to the overall city proportion of each.

What do the DI numbers mean?

DI values range from 0 to 1—where 0 is perfect integration and 1 (or 100, if decimals are not used) is complete segregation. The DI represents a “score” where values between 0 and .39 indicate low segregation, values between .40 and .54 indicate moderate segregation, and values between .55 and 1 indicate high levels of segregation.

Can the DI apply to neighborhoods?

The DI is not usually calculated at the neighborhood level; it is meant to be aggregated at the city or county level. At the neighborhood level the DI would examine racial and ethnic dispersion among city blocks, and a low-segregation score would mean even distribution of households along blocks, which is unusual in the United States.

Are there problems with the DI?

It is important to note that the DI generally uses White, non-Hispanic residents as the primary comparison group. That is, all DI values compare racial and ethnic groups against the distribution of white, non-Hispanic residents. This is a logical approach for the Regional AI because White, non-Hispanic residents are the largest racial and ethnic group in the region.

Another limitation of the DI is that it can conceal practices that lead to racial and ethnic exclusion. Counties without much diversity typically have very low dissimilarity indices, while counties with the most diversity will show high levels of dissimilarity.

SECTION II.

DISPROPORTIONATE HOUSING NEEDS

SECTION II.

Disproportionate Housing Needs

The primary purpose of a disproportionate housing needs analysis is to determine how access to the housing market and housing choice differ for members of protected classes—and to ensure that these disproportionate needs are part of housing plan goal-setting and strategic planning.

To that end, this section:

- 1) Identifies gaps in housing cost burden, for rental and for sale housing;
- 2) Examines differences in the ability to attain homeownership through mortgage loans;
- 3) Assesses how these differences affect housing choice. This includes geographic choice as well as differences in public and private housing options;
- 4) Examines differences in the races and ethnicities of beneficiaries of publicly supported housing and neighborhoods where publicly subsidized housing is concentrated; and
- 5) Identifies where gaps in housing choice are related to actions by the public or private sector, as reported by stakeholders and residents participating in focus groups and a review of fair housing complaint data.

Primary Findings

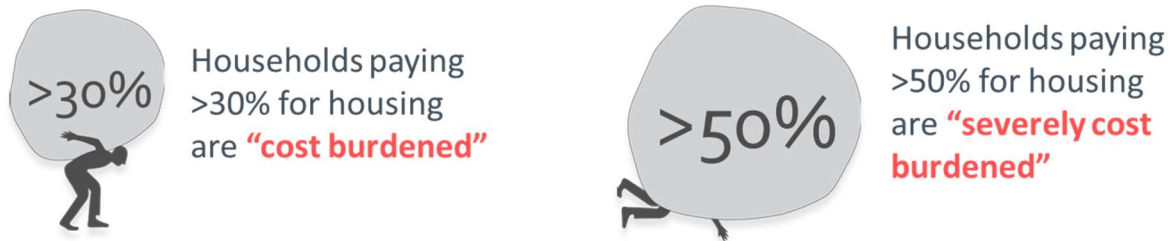
- Rising rents and tightening of the rental market has disproportionately hurt very low income single-person households and families, many of whom are racial and ethnic minorities, persons with disabilities, and elderly residents.
- Similarly, rising home prices has introduced predatory lending and home purchase activity—e.g., “we’ll buy your house as is” offers, rent to own scams, and predatory lending.
- Weak state laws to protect tenants from evictions without just cause exacerbates their vulnerability and increases homelessness, an undesirable outcome which is costly for the public sector.
- Residents and landlords would benefit from increased education and training, including fair housing laws and requirements and “good tenant” classes. Fair housing information should be more intentionally marketed through social service agencies and in grassroots newspapers and social media networks.

- There is growing concern about the effect of city-facilitated redevelopment efforts on displacement of low income and minority residents and skepticism that leadership is working in the best interest of these residents.
- Multifamily developments are not being built to comply with the accessibility requirements under the Fair Housing Act due to lack of inspection/testing and enforcement.

Cost Burden

A starting point for housing needs is the measure of “cost burden.” Cost burden exists when households pay more than 30 percent of their gross household income in housing costs. Housing costs include the rent or mortgage payment, utilities, renter or homeowner insurance, and property taxes.

Severe cost burden—paying more than 50 percent of monthly gross income on a household rent or mortgage—is an indicator of critical housing needs. Severe cost burden is also linked to a high risk of eviction or foreclosure, and homelessness.



Why policymakers should care about cost burden. From an economic perspective, Oklahoma City should aim to mitigate cost burden to allow households to invest in the local economy—through direct spending on goods and services, as well as investments in education, health, and well-being of their families. These investments bolster local revenues, increase job readiness, help renters become homeowners, lower the public costs of eviction and foreclosure, and, most importantly, increase the economic opportunity for children.

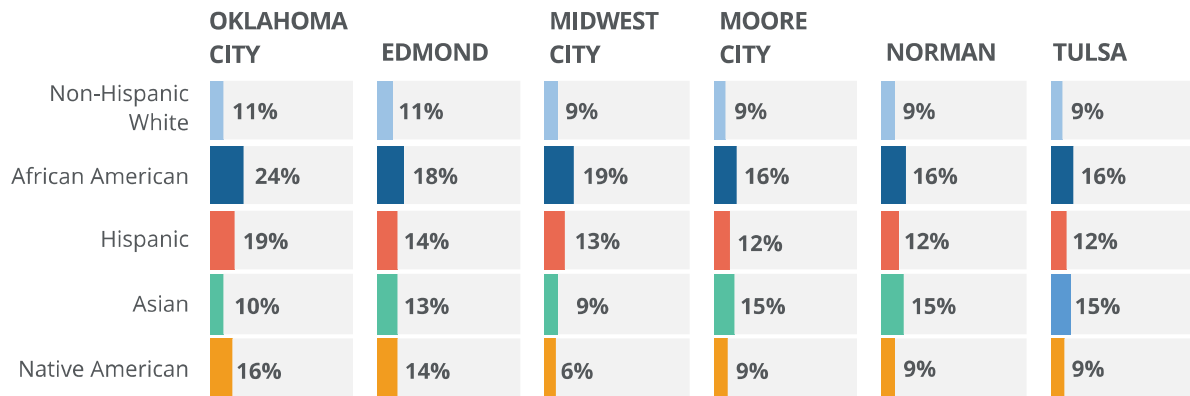
Differences in severe cost burden by race and ethnicity. As shown in Figure II-1, African Americans face the highest rate of severe cost burden of any resident group in Oklahoma City. Severe cost burden for African Americans living in Oklahoma City is much higher than in any other city in the region; this is also true for Hispanic and Native American residents.

Overall, in Oklahoma City:

- One in four African American households experience severe cost burden;
- One in five Hispanic households experience severe cost burden;

- One in six Native American households experience
- One in ten Asian and Non-Hispanic White households experience severe cost burden.

Figure II-1.
Households Experiencing Severe Cost Burden by Race and Ethnicity, by Jurisdiction, 2015



Note: Severe housing cost burden is defined as housing costs that are greater than 50 percent of income.

Source: HUD CHAS dataset using ACS 2011-2015. Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

Disparities in Homelessness

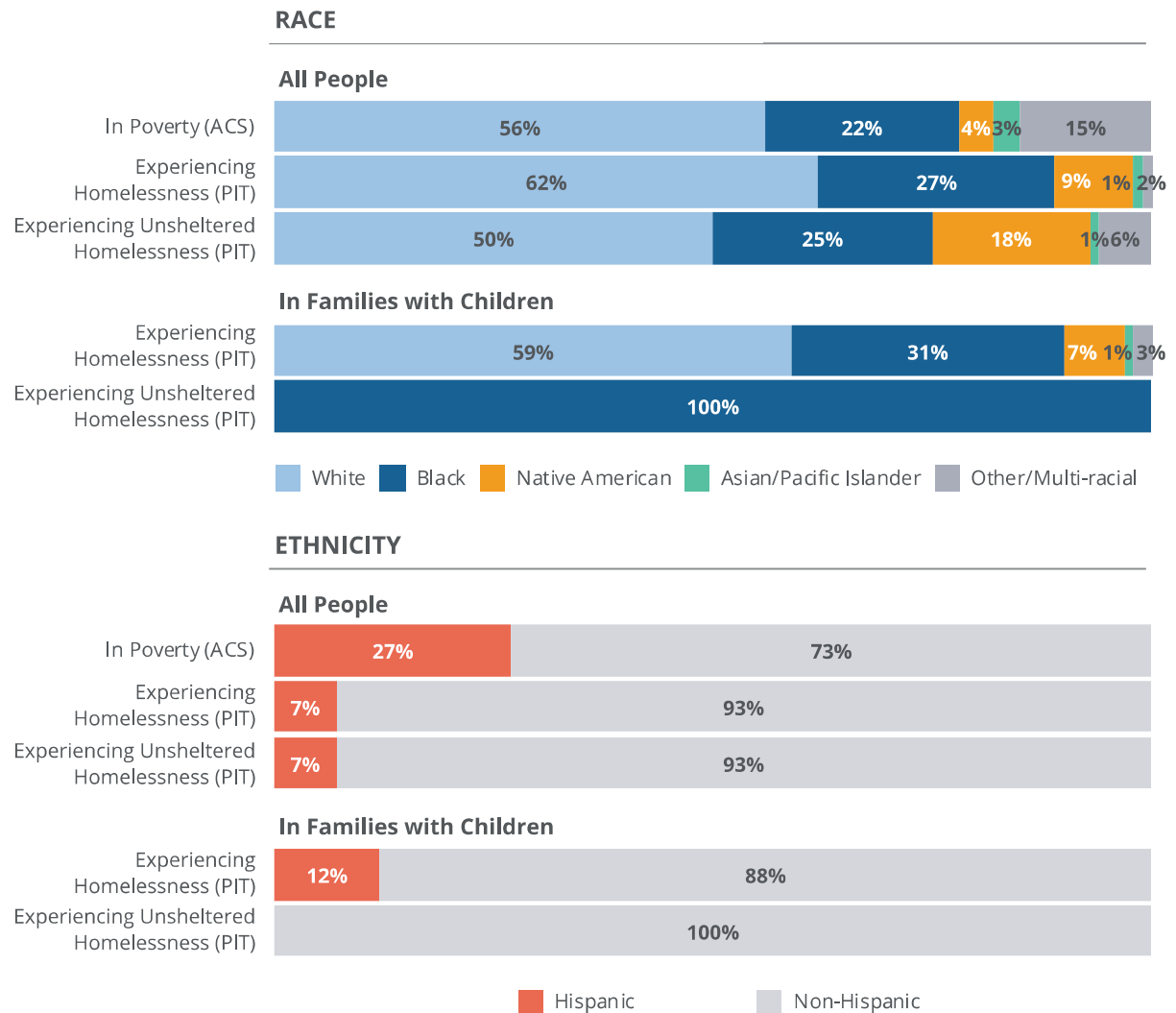
The most severe consequence of severe cost burden is homelessness, and, in Oklahoma City, the risk of homelessness is unequal among racial and ethnic groups, even after adjusting for poverty.

As demonstrated in Figure II-2, African Americans and Native Americans are disproportionately likely to experience homelessness:

- African Americans make up 22 percent of residents living in poverty in the Oklahoma City region. This compares to 27 percent of residents experiencing homelessness, 25 percent of residents who are homeless and unsheltered, and 31 percent of families experiencing homelessness.
- Native Americans make up 4 percent of residents living in poverty yet comprise 18 percent of residents who are homeless and unsheltered.
- White residents are also more likely to experience homelessness than their representation among residents living in poverty would suggest.

In contrast, residents of Hispanic descent represent 27 percent of residents in poverty and only 7 percent of residents experiencing homelessness.

Figure II-2.
Race and Ethnicity of Individuals in Poverty v. in Homelessness, 2015



Source: HUD Continuum of Care Equity data reflecting the Oklahoma City Continuum of Care region.

Evictions

According to the Eviction Lab project, Oklahoma City ranks 20th in the nation for evictions. This ranking is based on the city's eviction rate of 6.19 percent per 100 renters. In Oklahoma City, nearly 18 households are evicted every day ; 6,400 households are evicted each year. Tulsa is 11th in the nation with a rate of 7.77 percent.

Many stakeholders interviewed for this AI expressed concerns about the high rate of evictions in the city and the impact on families and the city:

- The costs of eviction are many, ranging from children moving schools to job losses to homelessness. A recent study in Philadelphia—which has an eviction rate half of that of Oklahoma City's—found that eviction costs the city \$45 million annually, which

could be avoided with a \$3.5 million investment in legal representation for renters to help avoid eviction.

- The University of Oklahoma’s Housing Eviction Legal Assistance Program (HELP) estimates that 9 out of 10 people are *not* represented in their eviction proceedings.
- Evictions disproportionately impact women/single mothers, people of color, and persons with mental health challenges.
- The city needs a three-pronged approach to eviction prevention:
 - 1) Invest in tenant education on rights and responsibilities;
 - 2) Provide renters at risk of eviction with legal representation to negotiate solutions other than eviction; and
 - 3) As part of code enforcement efforts, address “slumlords,” often out-of-state owners who do not keep their properties in good condition and use eviction as a threat against tenant complaints about condition. Some stakeholders feel that such landlords exploit poor families who have very limited choices in the housing market due to poor credit and/or lack of documentation. When code enforcement encounters such properties, officers could provide tenants with information about their rights (e.g., pamphlet with information in English and Spanish).

Gaps in Attaining Homeownership

For the majority of households in the U.S., owning a home is the single most important factor in wealth-building. Homeownership is also thought to have broader public benefits, which has justified decades of public subsidies to support ownership. The federal government has subsidized homeownership in various forms for nearly 100 years—yet the subsidies and wealth-building benefits of ownership have been realized by a narrow segment of households, largely due to the denial of ownership opportunity through restrictive covenants, lending bias, and direct discrimination.

Overall in Oklahoma City, 58 percent of households own their homes. This compares to 50 percent in Tulsa. Oklahoma City’s homeownership rate is also higher than similarly sized- and positioned-cities: Austin’s is 45 percent; Denver, 49 percent; and Sacramento, also 49 percent.

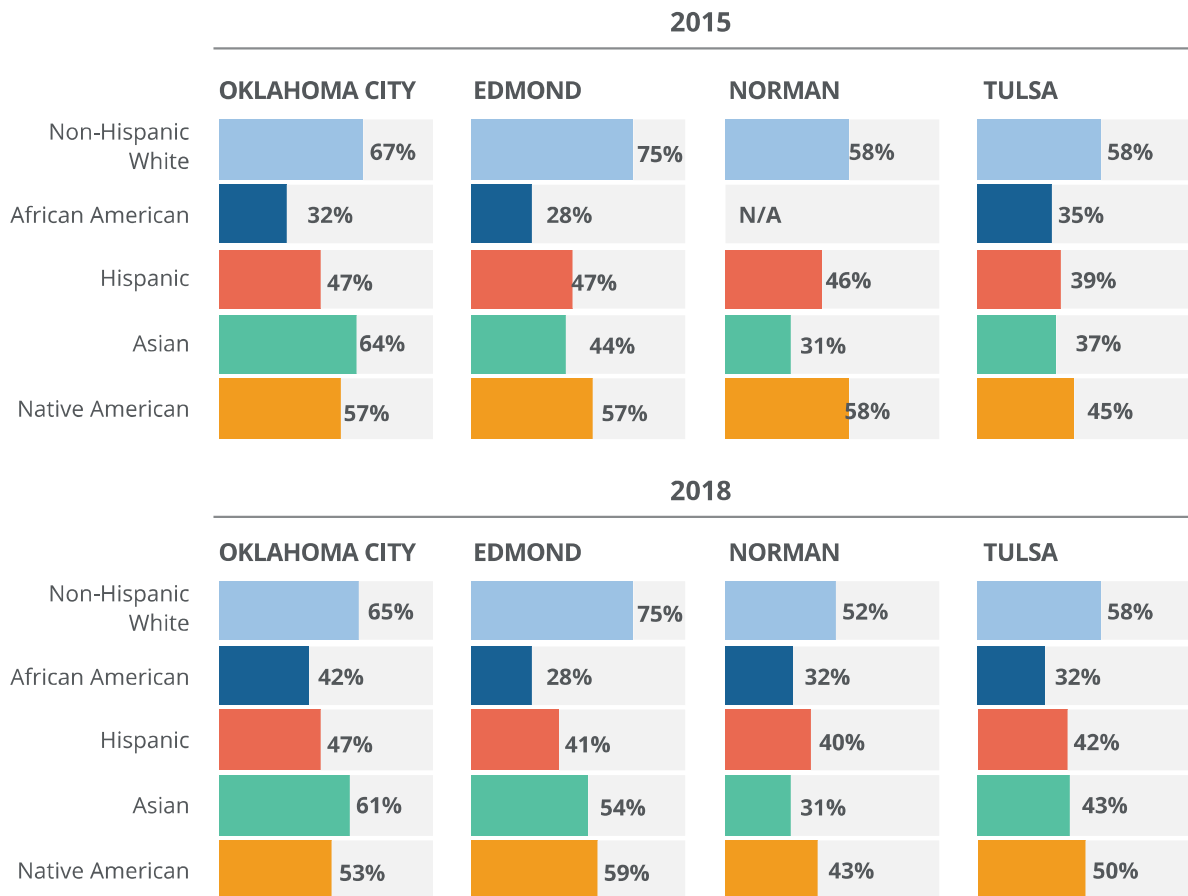
Yet homeownership rates vary considerably by race and ethnicity in Oklahoma City. Figure II-3 compares homeownership rates by race and ethnicity, in 2015 and 2018, and among jurisdictions for which 2018 data were available.

Oklahoma City shows a significant increase in homeownership for African Americans from 2015, although the rate of 42 percent in 2018 is still much lower than that of Non-Hispanic

White households. Oklahoma City's African American ownership rate is also much higher than peer cities, which did not show an increase from 2015.

Hispanic ownership did not change from 2015 and is lower than Non-Hispanic White ownership, yet remains higher in Oklahoma City than in other cities. For Asian and Native American households, the ownership rate declined slightly from 2015. Asian ownership in Oklahoma City is higher than in peer cities; Native American ownership is in the middle.

Figure II-3.
Homeownership by Race and Ethnicity, 2015 and 2018



Source: American Community Survey, 2013-2017.

A recent examination of the commonalities of cities with high rates of African American ownership found two important factors: 1) High levels of advocacy, organizing, and testing that guards against discriminatory practices and treatment; and 2) Inner-ring suburban areas that provide attractive alternatives to city living due to good schools, welcoming leadership, and affordability.¹ Ensuring that these factors are in place in Oklahoma City will

¹ <http://www.governing.com/topics/transportation-infrastructure/sl-black-homeownership-norm-in-these-cities.html>

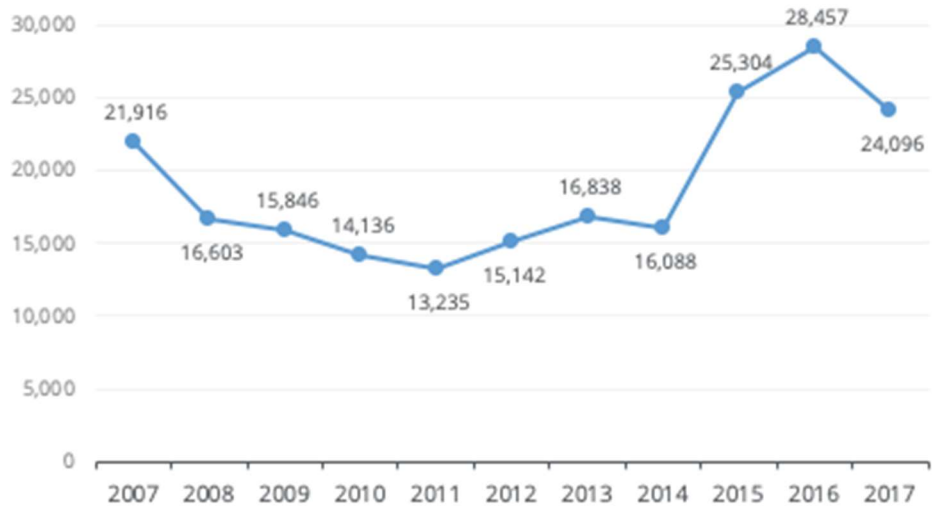
be important for the city to continue to boost ownership rates among under-represented households.

Differences in access to credit. The federal Home Mortgage Disclosure Act (HMDA) data are used to detect differences in mortgage loan originations by the protected classes reported in the data. The HMDA data analyzed in this section reflect loans applied for by residents in 2015, 2016 and 2017, with 2017 being the latest year for which HMDA were publicly available at the time this document was prepared. During this time period, nearly 78,000 households applied for a loan to buy a home, improve a loan, or refinance an existing loan, all in Oklahoma City.

In the past 10 years, applications were highest in 2016 and lowest in 2011. Loan applications declined significantly during the period of the Great Recession and bounced back beginning in 2015—yet declined by nearly 20 percent between 2016 and 2017.

Figure II-4.
Number of
Loan
Applications,
2007-2017

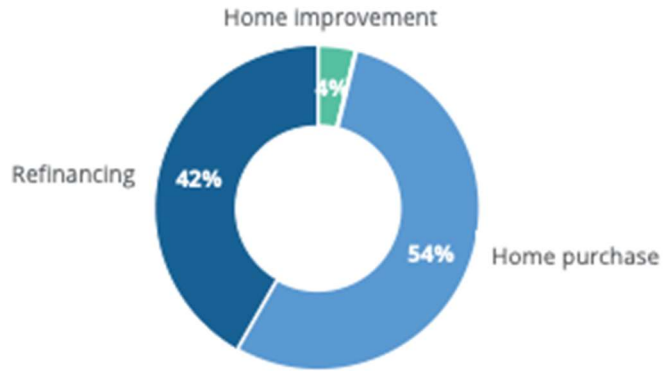
Source:
2015-2017 HMDA and
2014 AI.



Of the 78,000 loans applied for between 2015 and 2017, 54 percent were for home purchases, 42 percent were for refinancing existing loans, and just 4 percent were home improvement loans.

**Figure II-5.
Type of Loan Applications,
2015-2017**

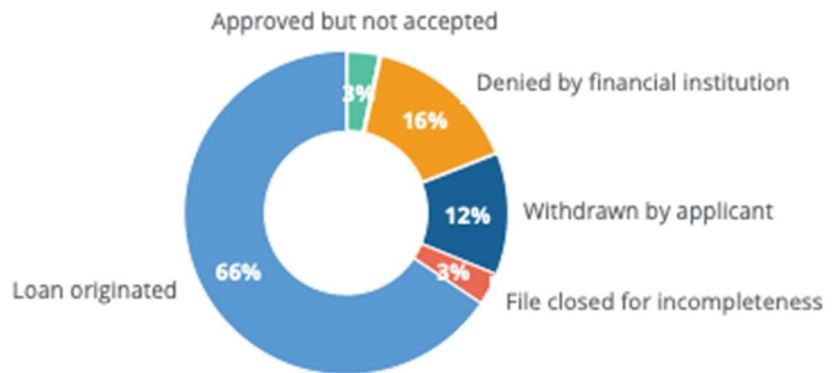
Source:
2015-2017 HMDA.



Overall, 66 percent of the loan applications were approved. Sixteen percent were denied. Another 12 percent with withdrawn by the applicant and the balance were not initiated because they were not accepted by the applicant or were incomplete.

**Figure II-6.
Action Taken on
Loans, 2015-2017**

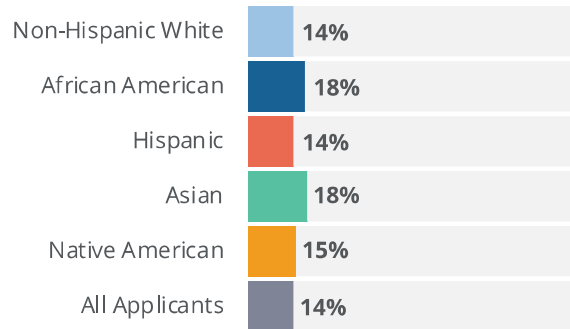
Source:
2015-2017 HMDA.



Overall, there was little variation in the proportion of loans denied by race and ethnicity. African American and Asian loan applications had the highest denial rate of 18 percent—4 percentage points higher than that of Non-Hispanic White applicants.

**Figure II-7.
Mortgage Loan Denial Rate by
Race and Ethnicity, 2015-2017**

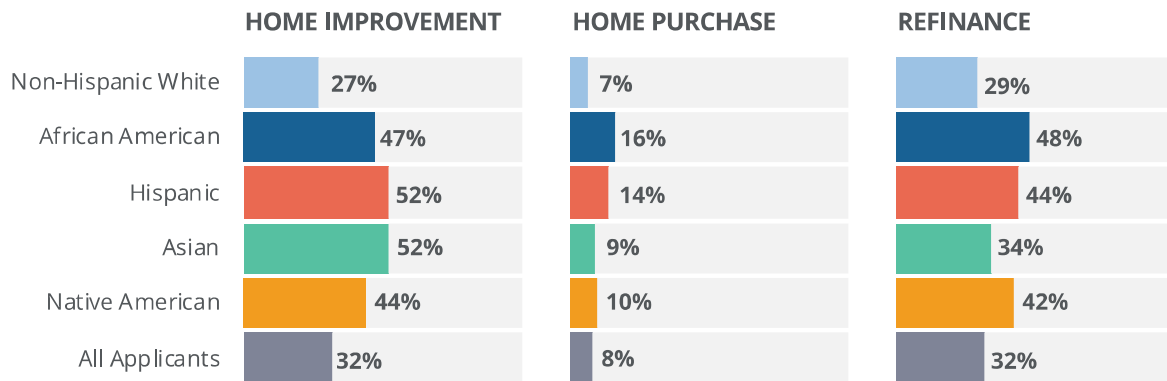
Source:
2015-2017 HMDA.



Variation is more pronounced by loan type, however, as shown in the figure below.

- For home improvement loans, around half of the applications submitted by African American, Asian, and Hispanic households were denied. This is much higher than the 27 percent denial rate for Non-Hispanic White applicants and 32 percent for all applicants.
- Refinances rates also differed widely among African American, Hispanic, and Native American applicants relative to Non-Hispanic White and all applicants.
- Home purchase denial rates showed the smallest percentage point differences.

Figure II-8.
Type of Mortgage Loans Denied by Race and Ethnicity, 2015-2017

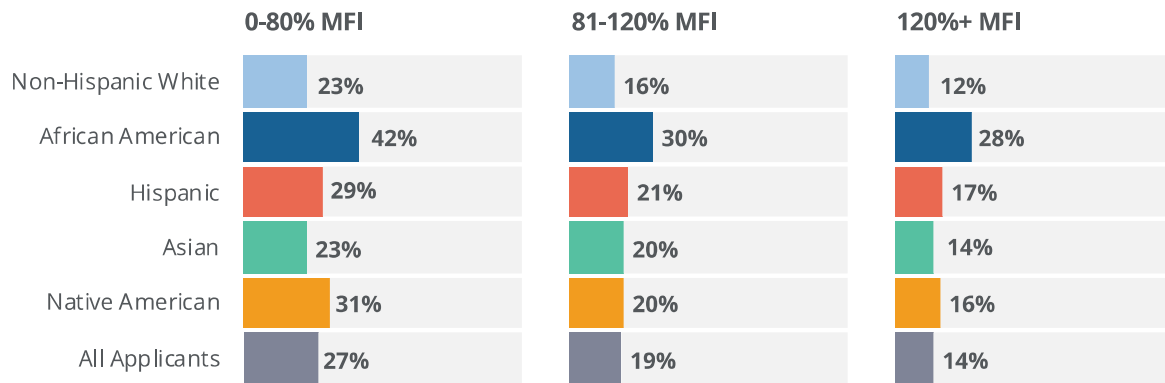


Source: 2015-2017 HMDA.

Figure II-9 shows differences in denial rates by race and ethnicity and applicant income.

- Across all ranges of Median Family Income (MFI) applicants, the denial rate is much higher for African American households than all applicants and all other racial and ethnic groups.
- African American applicants are unique in that their denial rate never approximates the “all applicants” rate. Even for the highest income applicant range, the African American denial rate is twice the all applicant rate.
- In contrast, Non-Hispanic White applicants have denial rates lower than all applicants across all income categories.
- The persistent differences in denial rates across income categories for African American applicants was also evident in the AI from 2014—although the denial rates overall were much lower.

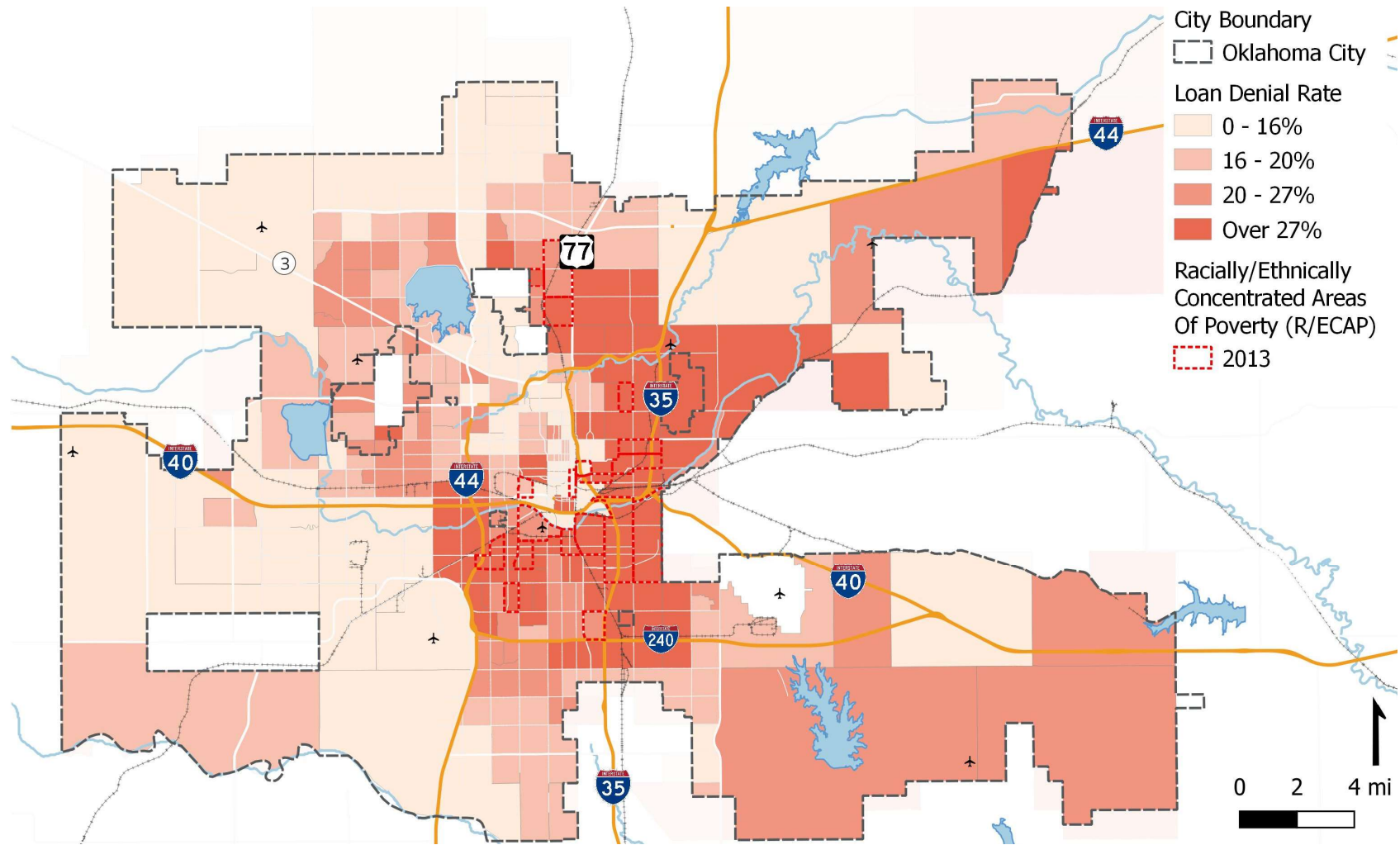
Figure II-9.
Denial Rate by Race/Ethnicity and Applicant Income, 2015-2017



Note: 2015-2017 HMDA.

Figure II-10 shows the geographic patterns in loan denials. The darkest shading shows areas where the denial rate was higher than that of all 0-80 percent MFI applicants. Nearly all R/ECAPs are in high-denial areas. High-denial areas are also those where the city's African American and Hispanic residents are most likely to live.

Figure II-10.
Loan Denial Rates, 2015-2017



Source: 2015-2017 HMDA .

Subprime lending. Nationally, in 2017, about 4 percent of conventional home purchases and 2 percent of refinance loans were subprime²—down from 25 percent in 2006.³

In Oklahoma City in 2017, 7 percent of mortgage loans carried subprime rates—much higher than the national proportion. As shown in the figure below, the proportion of subprime loans varied considerably by race and ethnicity, however, with one-fifth of the loans to Hispanic borrowers carrying subprime rates. The proportion of subprime loans made to African Americans is also relatively high at 13 percent.

Figure II-11.
Percent Loans Subprime by
Race and Ethnicity, 2015-2017

Source:
2015-2017 HMDA.

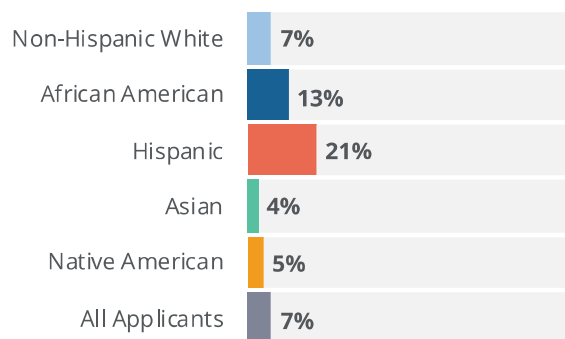
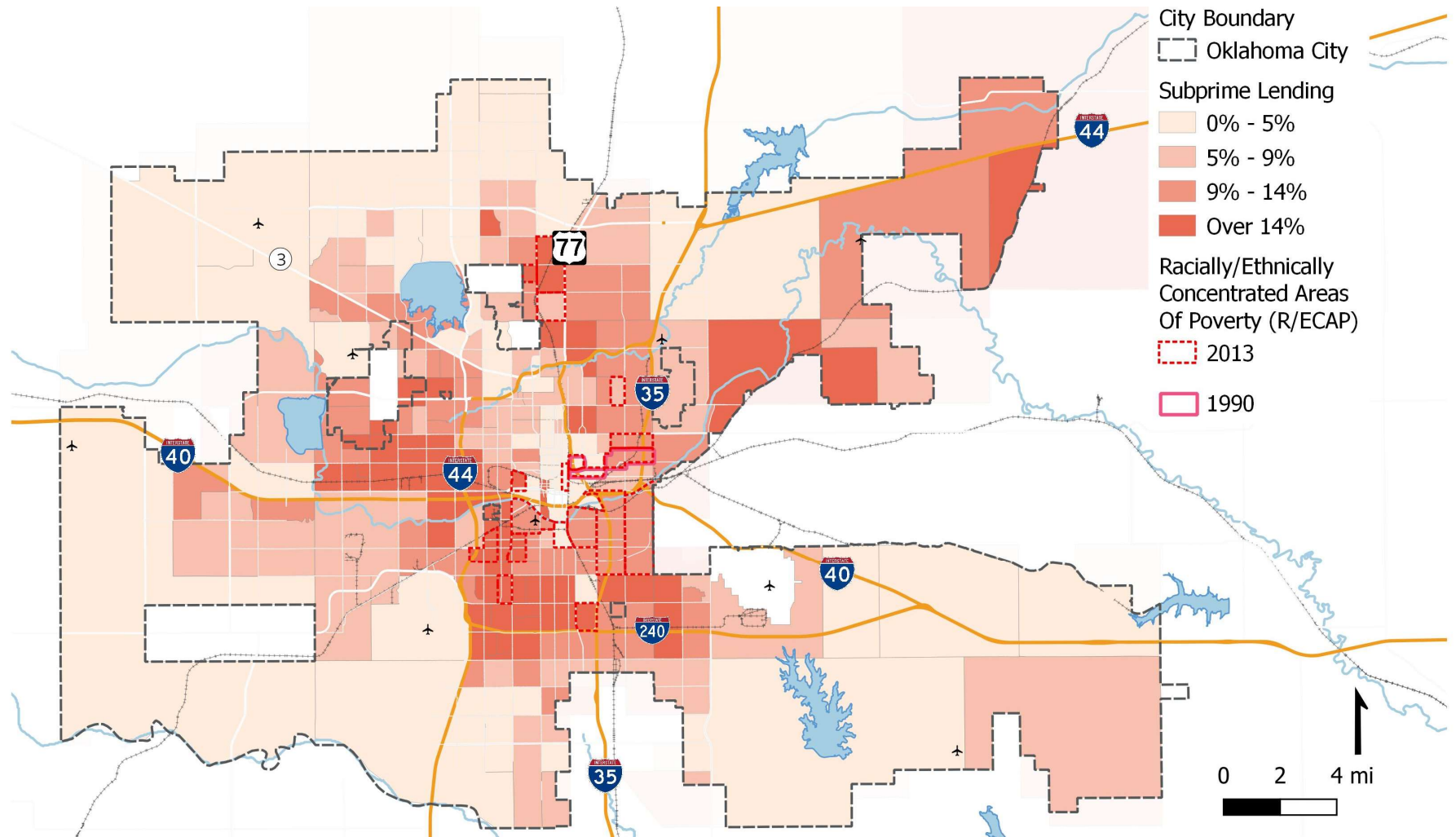


Figure II-12 is a map of subprime lending. Consistent with the data in Figure II-11, the geographic areas where subprime lending is most concentrated are also areas of Hispanic concentration. The exception are the neighborhoods on the western portion of the city which have moderate levels of poverty and Hispanic concentration.

² For the purposes of this section, “subprime” is defined as a loan with an APR of more than three percentage points above comparable Treasuries. This is consistent with the intent of the Federal Reserve in defining “subprime” in the HMDA data.

³ https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/bcfp_hmda_2017-mortgage-market-activity-trends_report.pdf

Figure II-12.
Subprime Lending, 2015-2017



Source: 2015-2017 HMDA..

Reasons for denials. Differences in denial rates are difficult to explain because of the variety of factors that influence the lending decision. HMDA data on reasons for denials are broad, and typically show little variation among racial and ethnic groups, with the primary reasons for denial being high debt to income ratios and poor credit history.

A growing body of research has looked more closely at the harder-to-detect reasons for differences in mortgage loan outcomes:

- A 2014 study found that much of the racial and ethnic variance in pre-recession subprime lending was determined by the lenders chosen by borrowers. Some lenders steered racial and ethnic minorities toward high rate loans, even when their risk profiles did not require a subprime rate.
- Many of these loans resulted in foreclosures, which disproportionately affected the communities in which racial minorities purchased homes.
- As discussed below, a more recent study has found that computer algorithms contain geographic biases that perpetuate differences in loan denials and subprime lending.

Effects of redlining on values. A recent study, conducted by researchers at UC Berkeley, suggests that past practices, which depressed home values in neighborhoods with minority residents, continues to have a negative effect in those neighborhoods. The computer algorithms used to determine mortgage pricing could treat some of these areas as higher risk.

The study found that, nationally, Latinx and African American borrowers paid between 5.6 and 8.6 basis points more for mortgage loans made between 2008 and 2015 regardless of the type (computer or human) of lender. This is equivalent to 11 to 17 percent of lender profit on the average loan, meaning that lenders earn significantly more from loans made to Latinx and African American homebuyers.⁴

There was little difference in the rate charged by computer or human, suggesting that the higher rate charged to minority borrowers is a factor of other variables, which are built into risk pricing and could be geographically related. The research also speculated that timing (urgency of getting a loan to buy a home once found) and lower frequency of comparison shopping among persons of color could also explain the interest rate differences.

There was, however, a difference in the denial rate for mortgage loans: humans rejected loans to these borrowers 4 percent more often than a computer did. Computer rejections did not discriminate on the basis of race and ethnicity at all.

⁴ The time period covered in that study includes the period when subprime loans were common; subprime loans are a much smaller part of the market today. Several lawsuits and challenges have demonstrated that minority borrowers received subprime loans that were not risk-justified.

Publicly Supported Housing and Neighborhood Access

A growing body of recent research has bolstered the evidence that where affordable and mixed-income housing is developed has a long-term impact on the households that occupy that housing. For example:

- Dr. Raj Chetty’s well known Equality of Opportunity research found positive economic returns for adults who had moved out of high poverty neighborhoods when they were children. The gains were larger the earlier children moved.
- A companion study by Dr. Chetty examining social mobility isolated the neighborhood factors that led to positive economic mobility for children. Children with the largest upward economic mobility were raised in neighborhoods with lower levels of segregation, lower levels of income inequality, higher quality schools, and greater community involvement (“social capital”).
- A similar study by researchers at Johns Hopkins University found that when assisted housing is located in higher quality neighborhoods, children have better economic outcomes. The study also concluded that because low income African American children are more likely than low income white children to live in assisted housing, the location of assisted housing in poor quality neighborhoods has a disproportionate impact on African American children’s long-term economic growth.

This research is counter to years of housing policies and programs that focused on building large multifamily complexes to house persons living in poverty, often placing these developments in the least desirable areas in a city.

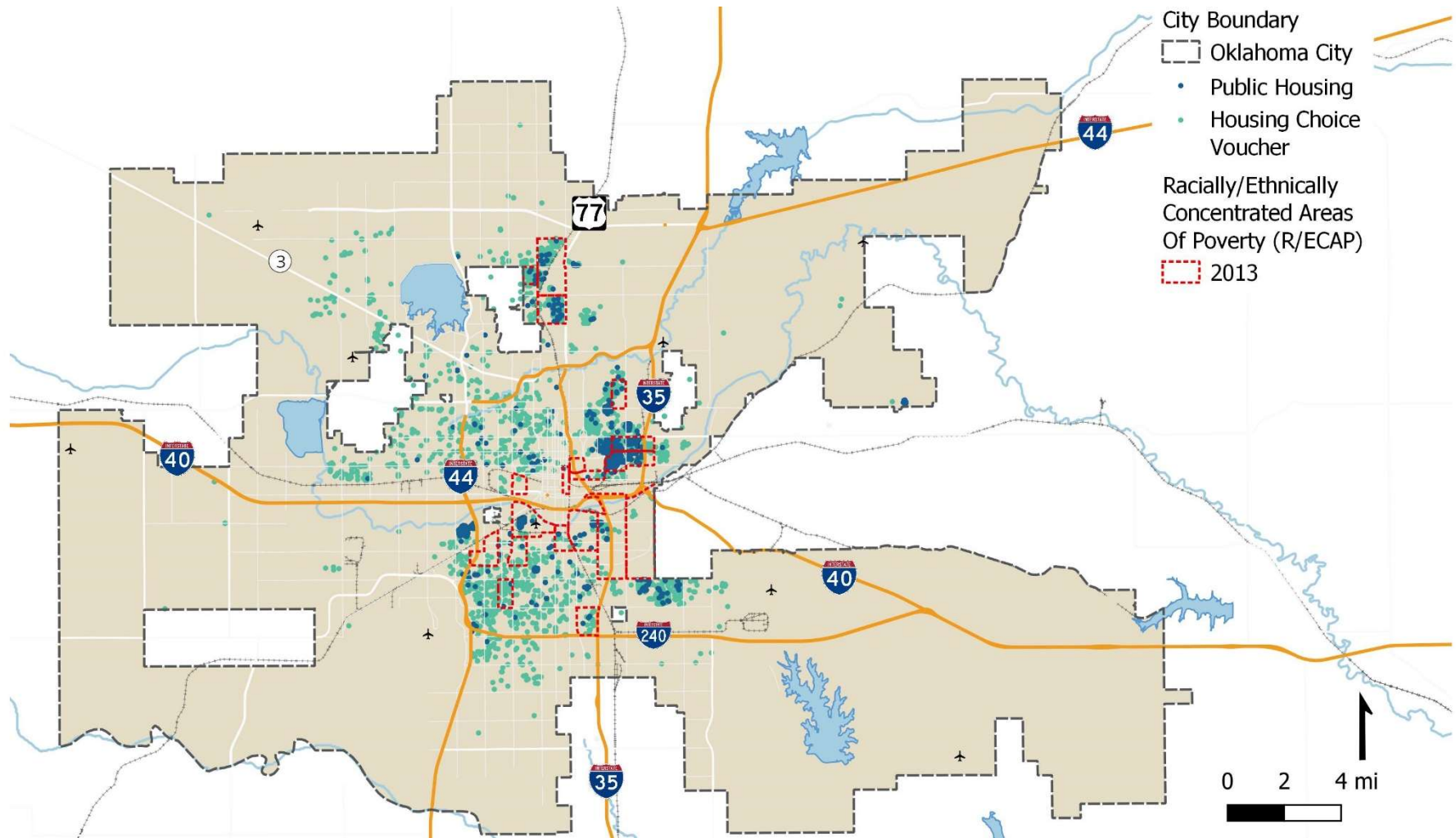
Public housing authority. The Oklahoma City Housing Authority administers more than 4,500 Housing Choice Vouchers and 2,900 traditional public housing units, with more than 400 scattered site units.

According to housing authority staff, demand is highest for 1 bedroom units to serve single, mostly elderly, households. In the past decade, demand has shifted toward smaller units and away from larger units. The housing authority offers preferences to senior and elderly households to help accommodate growing needs in the city.

Voucher holders seek housing that is close to strong schools—mostly in Edmond—yet units in those areas are the most difficult to find. Vouchers are easiest to place in the northwest and southwest portions of the city.

Figure II-13 shows the location of public housing, in addition to Housing Choice Vouchers. Housing Choice Vouchers are well distributed in the city with some modest concentrations in the south, reflective of where housing authority staff find the most available rental units. As with most housing authorities, traditional public housing is concentrated in a handful of neighborhoods, some of which are also R/ECAPs.

Figure II-13.
Public Housing and Housing Choice Vouchers, 2019



Source: Oklahoma City Housing Authority

Figure II-14 shows the racial and ethnic breakdown of households served by the housing authority. Except for “other multifamily” housing, racial and ethnic minorities benefit from publicly subsidized housing proportionate to their representation of households overall. In sum, the data do not reveal any significant concentrations of racial or ethnic groups in any type of publicly subsidized housing.

Figure II-14.
Race and Ethnicity of Publicly-Supported Housing Occupants

	Non-Hispanic White	African American	Hispanic	Asian	Native American	Total Minority
Other Multifamily	55%	12%	5%	2%	4%	22%
Project Based Section 8	17%	28%	3%	2%	7%	41%
Public Housing	13%	24%	17%	0%	2%	44%
Compared to Total Households	54%	15%	19%	5%	1%	46%

Note: HUD AFFH Raw Data, February 2018.

The greatest challenges in meeting the large and growing need for deeply subsidized housing, according to housing authority staff, include:

- Landlords in Oklahoma City are quick to evict tenants. The housing authority has a plan in place and legal staff working to lower evictions by enhancing resident services and “good tenant” programming.
- Past drug use and convictions, including the prevalence of opioid use, of clients are a major challenge in housing the city’s most vulnerable residents. The housing authority has a 5 year look back for drug use and considers convictions only, not just arrests, to avoid disproportionate impacts on persons of color.
- HUD does not typically fund housing authorities to provide the services necessary to support the needs of residents with mental health challenges.
- Tighter rules from HUD regarding immigration status complicate access to housing for those who do not have a social security card, regardless of their citizenship status. It is very time consuming and difficult to get a social security card in Oklahoma City; the office is not convenient for residents without a car.
- Lack of frequent public transportation is a major barrier for clients.
- Keeping up with the cost of rising utilities is a growing challenge for clients.

Resident and Stakeholder Input on Barriers to Housing Choice

Private barriers to housing choice were discussed with stakeholders and residents during the development of this AI. These discussions focused on both disproportionate housing needs, as well as affordable housing gaps in general. This section summarizes the primary findings from those discussions.

Rental Market and Gaps

- Rental housing very hard to find for extremely low income renters (earning less than 30% MFI) as well as middle class renters (those with incomes just above LIHTC income limits).
- The median rent consumes 80 percent of monthly assistance for a senior or resident with disability who cannot work and must live on Social Security/Disability Income.
- To adequately address the needs of extremely low income renters with special needs, Oklahoma City needs 5,000 units of truly supportive housing with onsite case management as part of the housing spectrum.
- Redevelopment of formerly low income areas is producing luxury rental units that are unaffordable for the residents who were displaced. These units are perceived as being for “newcomers,” not for long time OKC residents. Residents worry that plans for the areas around the medical campus will further exacerbate gentrification and displacement.

Homeownership Market and Gaps

- Residents are very concerned about gentrification in the city’s remaining and most affordable neighborhoods in the South and East/Northeast neighborhoods. They witness \$30K homes being scraped, replaced with \$250K+ homes. This raises concerns about rising property taxes that residents on a fixed income cannot afford.
- Affordable ownership products are lacking for middle class households, earning \$50,000 to \$75,000 per year.
- The city should prioritize preservation of traditionally “blue collar” neighborhoods with high homeownership rates for future families and workers.
- “Rent to Own” and predatory lending scams target Hispanic households and seniors with homes in need of repairs.

Services

Oklahoma City has been hit by the opioid crises and providers are under-resourced. The faith community fills the gap by providing substance abuse counseling and assistance, yet their resources are limited. There is only one medical detox provider with 25 beds; they are

oversubscribed and there is a two month wait to get in. Similarly, the city's mental health crisis centers can only accommodate worst case needs—immediate danger of harm, which a very narrow definition of crisis.

Leadership on Housing

- Many residents are skeptical of the city's plans for housing development and feel that affordability is not part of the plan. They perceive development as driven by people with long-time connections and old money—*"They're not for us or like us."* Lack of representation of residents who are not "connected" or economically powerful on city boards and commissions fuels this skepticism.
- Residents expressed a desire for better representation of the Black community living in East/Northeast CHDO Boards. Some residents feel that the homes being built by CHDOs are too small for a traditional Black or Hispanic family.
- Some residents believe that community engagement occurs *after* decisions have been made and is only conducted to check a box. *"We want more than a seat at the table; we want an invitation to the kitchen to help cook."*

Fair Housing Complaints and Enforcement

The 2014 AI reported that Oklahoma City residents had filed 325 complaints between 2004 and 2014, for an average of 30 complaints annually. The top reasons for the fair housing complaints were disability and race, followed by familial status. The two most common discriminatory acts that led to the complaints included: 1) Different terms or conditions in privileges, services or facilities; and 2) Coercion and related discriminatory acts.

Between 2015 and 2018, 79 complaints were filed, for an average of 20 complaints per year. Recent trends show the number of complaints on a declining trend: 26 were filed in 2015, 29 in 2016, 15 in 2017, and 9 in 2018.

The Metropolitan Fair Housing Council, discussed below, managed 356 fair housing cases in 2018, with approximately one-quarter related to disability and another one-quarter related to familial status. The balance were race and ethnicity related cases.

These trends are consistent with observations by fair housing advocates who noted that filings, as well as general advocacy, has been hampered by fear that landlords will evict tenants who complain about their treatment or conditions of their rental units. Both federal and state legislation has contributed to this fear, including bills that restrict public programs to U.S. citizens, as well as White nationalist movements.

According to the complaints filed between 2015 and 2018, the most common bases for complaints include:⁵

- Discrimination on the basis of disability at 62 percent of all complaints;
- Discrimination based on race at 25 percent of all complaints;
- Discrimination based on gender/sex at 15 percent of all complaints.

Refusal to rent, different conditions for rentals, and refusal to make reasonable accommodations were the most common violations alleged.

Interviews with stakeholders for this AI provided additional detail on the experiences of vulnerable residents:

- Hispanic residents, in particular, are reluctant to file complaints, report discrimination, or call code enforcement about rental units in poor condition. They worry that their landlords will report them to immigration officials or evict them.
- Discrimination against families is increasingly more subtle—e.g., regulations that prohibit where children can play within an apartment complex.
- Multifamily developments are not being built to comply with the accessibility requirements under the Fair Housing Act due to lack of inspection/testing and enforcement.
- Rising rents and tightening of the rental market has disproportionately hurt very low income single-person households and families, many of whom are racial and ethnic minorities, persons with disabilities, and elderly residents. Weak state laws to protect tenants from evictions without just cause exacerbates their vulnerability and increases homelessness.
- Similarly, rising home prices has introduced predatory lending and home purchase activity—e.g., “we’ll buy your house as is” offers, rent to own scams, and predatory lending.
- Fair housing knowledge and awareness among residents is still lacking, especially among vulnerable populations.

Fair housing organizations. Oklahoma City is very fortunate to have a well-established fair housing agency, the Metropolitan Fair Housing Council of Oklahoma (MFHC). The city funds the activities of MFHC annually as part of its commitment to fair housing. MFHC serves residents statewide with fair housing counseling, investigation and testing, mediation services, and legal and complaint referral.

⁵ Percentages total more than 100 due to multiple bases in some complaints.

In Oklahoma, fair housing complaints must now be filed with HUD because of the lack of a state fair housing investigative agency. MFHC facilitates the filing of HUD complaints and advocates for residents during the investigation process. This is a change from when the Oklahoma Human Rights Commission was active and investigations occurred at the state level; this expedited the resolution of complaints.

Residents of Oklahoma City can also be served by Legal Aid OK, a nonprofit law firm that provides legal assistance to low income residents and seniors. Legal Aid offers a range of services that include assistance to individuals who believe that they have been subject to discrimination and eviction assistance.

Since the 2014 AI, MFHC has settled two very high profile cases:

- In 2018, a \$50,000 settlement was achieved by a homeowner with a disability living in the Shady Acres Mobile Home Park in Oklahoma City. The plaintiff, who owned her mobile home and rented the lot space in the park, was denied a reasonable accommodation for an assistance animal.
- In 2017, MFHC settled a complaint for \$800,000 brought against Walter Ray Pelfrey by several defendants who alleged discrimination on the basis of sex, as well as sexual harassment and unwelcome sexual advances, in exchange for rent forgiveness, promises not to evict, and payment of utilities.

SECTION III.

ZONING AND LAND USE

SECTION III.

Zoning and Land Use

This review discusses areas where Oklahoma City's zoning ordinances and land use regulations could be improved to ensure compliance with federal laws related to fair housing choice.

Summary of Recommendations

The regulatory review of Oklahoma City's zoning and land use policies found many areas where the code could be clarified or strengthened to avoid fair housing challenges. The areas we recommend for priority action include:

- The code should add flexibility to the definition of family to avoid potential fair housing challenges and better reflect changing living arrangements.
- The code would benefit from a legal review on potential fair housing challenges associated with treatment of persons with disabilities living in group homes. Several areas of the code are unclear and may result in treating persons with disabilities differently from non-disabled persons and among people with different types of disabilities.
- The city's code update should consider revising densities and development standards to ensure they accommodate a wide range of housing types and products that are typically more affordable and avoid indirect effects of segregating protected classes into certain neighborhoods. This should include an assessment of where different housing types are allowed, how rezoning decisions affect housing type placement, and the impact of required approval processes for variances on the distribution of housing by type and level of affordability. Some cities are achieving this by building an equity framework into their updated comprehensive plans and codes.

Best practices that are not as critical in nature but would be beneficial during the update of the code or in text amendments include:

- Include a definition of disability that is consistent with the Federal Fair Housing Act.
- Establish standard processes for reasonable accommodate requests.
- Allow ADUs and other types of gentle density in some single family districts, potentially in exchange for affordability commitments.

Background on Federal Laws

The Federal Fair Housing Act (referred to as the Fair Housing Amendments Act, or FHAA, to acknowledge the full protections the act affords) requires that recipients of housing and community development funds affirmatively further fair housing choice. This includes avoiding policies and/or practices that limit the fair housing choice of the individuals and households protected by the FHAA.

Land development codes cannot contain standards, definitions, or procedures that result in differential treatment in housing on the basis of race, sex, religion, national origin, color, disability, or familial status (households with children under the age of 18). In addition, land development regulations that increase development costs, e.g., through density or design requirements that make residential development overly expensive, can limit the supply of affordable housing. In most communities, this has a direct impact on racial and ethnic minorities, larger households and families with children, and persons with disabilities because these groups are disproportionately represented among those residing in lower cost housing. Limits or prohibitions on multifamily housing or restrictions on household occupancy are other examples of how land development codes can negatively affect the groups protected under FHAA.

The Americans with Disabilities Act (ADA) prohibits discrimination based on disability, defined by ADA as a physical or mental impairment. The ADA requires accessibility in public places (i.e., open to and used by the public) and also requires that “reasonable accommodations” be allowed when necessary to permit persons with disabilities equal opportunity to enjoy such places. The accessibility provision in the FHAA governs residential accessibility, and requires that multifamily buildings built after March 13, 1991 have specific accessible design features and be adaptable. In addition, the FHAA ensures that persons with disabilities have the right to request and be granted modifications to residential units—as well as local regulations and standards—to make a residence or building accessible to them.

Common Regulatory Barriers

Some of the key factors in land development codes that most commonly result in barriers to fair housing choice and reasonable accommodation include:

- **Site standards.** Large lots or excessive setbacks between structures or from streets that can increase development costs, e.g., special infrastructure;
- **Limits on density.** Restriction on or prohibition of multifamily housing; low floor area ratios (FAR) for multifamily or mixed-use development; or low density requirements;
- **Use-specific standards.** Special site or operational requirements for group homes for persons with disabilities that are not required for other residences or groups;

- **Differences in quality and access to public services.** Additional requirements for infrastructure or essential municipal services not required for other residences or dwelling units;
- **Definition of family and occupancy restrictions.** Definitions of family or occupancy limits that prohibit or limit the number of unrelated persons in a household;
- **Procedures for development or rezone reviews.** Extensive review procedures, public hearings, or notice requirements for different housing types, housing for protected classes, or low-income housing;
- **Housing types.** Limits or prohibitions on alternative affordable housing options such as accessory dwelling units (ADUs), modular or manufactured homes, and mixed-use developments;
- **Spacing.** Minimum distance between group homes that are not required for other residences or groups and make development of group homes difficult;
- **Reasonable accommodations.** Regulations inhibiting modifications to housing for persons with disabilities or their ability to locate in certain neighborhoods; and
- **Code language.** Local land development codes and standards that are not aligned with federal and state regulations governing fair housing and reasonable accommodation.

Oklahoma City Regulatory Review

The Oklahoma City Zoning and Planning Code was reviewed based on a checklist developed by the Region IX HUD office (“Review of Public Policies and Practices—Zoning and Planning Code). The checklist poses a series of questions aimed at common zoning regulations that impact fair housing. The questions in that checklist are consolidated below and used to evaluate the zoning and planning code.

1. Is there a definition of “family” and does it discriminate against group living for persons with disabilities?

Family is defined in section 59.2150 of the Zoning and Planning Code as “one or more persons related by blood or marriage, including adopted children, or a group of, not to exceed five unrelated persons (not related by blood or marriage), occupying the premises and living as a single non-profit housekeeping unit, as distinguished from a group occupying a boardinghouse, lodging house, or hotel.”

This definition does not single out persons with disabilities and would include both related and unrelated persons as long as the group meets the other parameters of the definition: related by blood, marriage or adoption or an unrelated group not exceeding five persons, regardless of an individual’s disability.

Although not unusual in residential codes, the definition could come into conflict with FHAA since it limits the number of unrelated persons but does not limit the number of “related” persons. While all unrelated persons are treated the same, this definition could create disparate treatment if a related family of eight persons is permitted to reside in a residence similar to one inhabited by unrelated persons with disabilities or other protected classes who may be more likely to live in unrelated group settings (e.g., farmworkers, refugees), who are limited to five persons in the same residence.

The city’s definition may also create barriers to forming cooperative housing arrangements, which are becoming a more common solution to housing affordability constraints and growing in popularity among single, unrelated residents, including older adults seeking communal living arrangements.

To that end, some cities have moved away from defining “family” to avoid potential FHAA conflicts and instead rely on occupancy standards to regulate residential overcrowding. The recent “Scarborough 11” case in Hartford, Connecticut provides a strong case for removing narrow definitions of family from local codes.

The Planning and Zoning Code also defines different types of residential units in section 59-8200, Residential Use Unit Classifications. One type of residential unit listed is “group residential.” This is defined as “the residential occupancy of living units by a number of occupants, not constituting a family or otherwise related, but occupying the structure on a non-transient basis. Typical uses include occupancy of fraternity or sorority houses, dormitories, boardinghouses, lodging houses and monasteries...” It is unclear how this definition may relate to groups of persons with disabilities living in a single-family dwelling unit. Because of this there may be confusion about how to review a residential facility serving a group of persons with disabilities and to determine which zone district permits such facilities.

2. Are there any occupancy standards or maximum occupancy limits?

Except as noted in the definition of “family,” there are no occupancy standards or maximum occupancy limits established for residential dwelling units in the Zoning and Planning Code.

3. Is the number of unrelated disabled individuals residing together restricted but there is no restriction for other persons?

There does not appear to be any restriction for the number of unrelated disabled individuals residing together. As discussed above, the definition of family restricts groups of unrelated persons living together to a maximum of five.

4. Is “disability” defined and is the definition the same as FHAA?

“Disability is not defined. A best practice is to define disability in alignment with FHAA or to reference FHAA (note that the term “handicapped” is used in FHAA and is interpreted to have the same meaning as “disability”). This is helpful in determining

requests for reasonable accommodation and ensures that all disabilities encompassed by FHAA are acknowledged in the local zoning code—including persons with substance abuse challenges who are in recovery. This group has been found by the courts to meet the definition of “disability.”

5. Are housing opportunities for persons with disabilities restricted or mischaracterized as a “boarding or rooming house”?

No. The code allows a use called “low impact institutional: residential-oriented.” This use specifically states that a typical use is “group home for the mentally or physically handicapped,” and also states that persons adjudicated as “criminal, delinquent, or mentally ill” may not be residents. It is a permitted use in 17 zone districts, including all the lower density residential zones. The definition does not stipulate a maximum or minimum number of residents. It clearly states that such group living facilities may be public, quasi-public, or private. The code also includes a definition for “group residential,” broadly defined to include “boarding houses” and “lodging houses.” This use is permitted in five zone districts and only one of those is a residential zone.

These aspects of the code could benefit from clarification and revision in several ways:

- There may be some confusion in assigning a land use category to a group living facility, particularly if that facility provides housing for more than the number of individuals permitted in the definition of “family” for a group of unrelated persons. To that end, clarification is needed on whether either of these residential unit uses must also comply with the unrelated persons occupancy restrictions established in the definition of “family.” There also needs to be clarification regarding how larger residential facilities, not meeting the definition of “family,” are treated and where they are allowed.
- The definitions exclude some categories of disability, such as persons with developmental disabilities and persons in recovery, which are covered under the FHAA, and, as such, may have the effect of excluding these protected classes from a range of residential settings. The U.S. Department of Justice states that the FHAA term mental or physical impairment “may include conditions such as blindness, hearing impairment, mobility impairment, HIV infection, mental retardation, alcoholism, drug addiction, chronic fatigue, learning disability, head injury, and mental illness.”¹ The DOJ also provides an example of a violation of the FHAA that resembles the city’s code: “An example would be an ordinance prohibiting housing for persons with disabilities or a specific type of disability, such as mental illness, from locating in a particular area, while allowing other groups of unrelated individuals to live together in that area.”

¹ <https://www.justice.gov/crt/fair-housing-act-1#disability>

6. Does the zoning code allow housing with on-site support services for persons with disabilities?

The definition for “low impact institutional: residential-oriented” includes language that recognizes residents of such facilities may need “special care, supervision, or treatment.” It does not state if such care-givers may be live-in, and if so, if they are calculated in the determining the occupancy for the purposes of satisfying the limitations established for groups of unrelated persons living together found in the definition of “family.” The definition for “group residential” is silent regarding on-site support services, making it unclear as to whether a necessary support service would be considered an allowed accessory use or a primary use that also would need to be a permitted use in the zone district.

Clarification is needed on how live-in staff is counted for the purposes of determining compliance with the definition of “family” and whether on-site support services are an accessory use in “group residential.”

7. Are there definitions for “special group residential housing” and if so, do the definitions align with FHAA.?

Yes, there are several definitions for different types of group residential housing. The definitions do not limit the number of persons residing in the group housing, which minimizes potential conflict with FHAA. In addition to “low impact institutional: residential-oriented” and “group residential” (see items 5 and 6), the following types of “special group residential housing” are included in the residential use unit classification:

- Congregate Care Housing and Convalescent Homes: A residential facility with support services and 24-hour nursing home care.
- Senior Independent Living: Rental housing for independent elderly adults not needing 24-hour oversight. Services such as meals, laundry, transportation, housekeeping, and organized social activities may be provided.

Included under the civic use unit classification are also:

- Domestic Violence Shelters: A residential institution providing shelter and meals for domestic violence victims and their families and where counseling and other support services may be provided.
- Emergency Shelters and Feeding Sites: Transient sleeping and/or meals on a nightly basis provided by charitable organizations.
- Residential Facilities for Dependent and Neglected Children: A supervised residential institution caring for children who cannot reside in their natural home.
- Transitional Mental Health Residential Facilities: A supervised residence with treatment and counseling for stabilized mental health clients who are the responsibility of, and under the control of, the State mental health system or a similar authority.

- Forced Detention or Correction Facilities: Facilities for the confinement of persons accused or convicted of offenses, and may include prisons, jails, work release facilities, pre-release centers and halfway houses.

Although these are listed as “civic uses” the persons residing in these facilities may be a protected class. See the discussion in Item #9.

8. Is there a process to allow waivers of zoning and building code regulations for reasonable accommodation for persons with disabilities?

No process is set forth in the zoning code to allow waivers of zoning requirements for reasonable accommodation. The variance process allows the Board of Adjustment to grant relief from the requirements of the zoning code. However the variance must be necessary because of “conditions that are peculiar to the particular property involved.” This strictly limits the scope of the variance process to physical characteristics of the land and makes it unavailable to persons who are requesting a modification to zoning requirements based on reasonable accommodation. Such requests may include a wheelchair ramp that does not meet setback regulations, a modification to an exterior wall to accommodate certain equipment necessary to address a particular disability, or special exterior treatments.

A best practice is to establish a standard process for reasonable accommodation requests. Some codes identify typical requests, such as a setback waiver for wheelchair ramps, as administrative in nature when it does not exceed a certain amount. Such requests are processed the same as any other building permit. Other reasonable accommodation requests are processed with a more detailed administrative review using criteria that comply with FHAA and ADA. This clarifies how a reasonable accommodation is reviewed and removes such requests from consideration under procedures and criteria that do not fit the circumstances of the request. When the reasonable accommodation request does not qualify for administrative review, a review before an appointed body can be used. However, the same criteria for deciding the request must be used:

- Whether the person to be accommodated has a disability;
- Whether the modification requested is reasonably necessary to accommodate that disability; and
- Whether the modification would fundamentally and unreasonably alter the nature or purposes of the zoning ordinance. The burden is on the municipality to prove this would occur.

The International Building Code (IBC) allows appeal of decisions of the building official and decisions can be made based on “alternate equivalency” to meeting the IBC requirement. The building code does not tie the determination of an alternative to the physical characteristics of the property or building, making the standard appeal process

available to process requests for reasonable accommodation. Examples may include lower sink heights to accommodate a person in a wheelchair, or special positioning of grab bars to accommodate different types of disabilities.

9. Are public hearings required for exceptions to land use codes for disabled applicants but no hearing is required for all other applicants?

“Low impact institutional: residential-oriented” is a permitted use in all residential zone districts except the two mobile home zone districts, in all the downtown design districts, and in Tracts 1, 2, and 3, of the neighborhood conservation district. It is not allowed in any other districts except the historic preservation district where it requires a review through the special exception process. Multiple family also is processed as a special exception in this zone district, but single-family residential is a permitted use, with no special review beyond the requirements of the historic preservation zone district (HP). While the “low impact institutional: residential-oriented” is broadly defined to include a variety of group living situations which may or may not be for persons with disabilities, the special exception process in the HP District may conflict with FHAA when it is a residence for persons with disabilities. Since this use is permitted the same as single-family residential in all other residential zone districts (excepting the two zone districts for mobile homes) it is unclear why it would be treated differently in the historic preservation district. It should be noted that for the purposes of determining disparate treatment of persons with disabilities the comparison is to other single-family residential, not to how other groups in similar residential facilities are treated.

Urban Conservation Districts (UCD) are specific areas established by ordinance that set development regulations in addition to the underlying zone district. The regulations are specific to each UCD and may govern the use of land. Section 13650.4 states that “UCD regulations can supersede any provisions of the zoning code regulating “low impact institutional: residential-oriented” use.” The underlying zone district governs whether this use is permitted, how it is reviewed, and any special standards, not the UCD overlay. Note that in no case do the underlying zone districts subject to a UCD overlay establish special standards for “low impact institutional: residential-oriented” uses.

Also of note is that separate land use categories (use unit classification) are established for several specific types of residences. Contained in the “civic use classification,” these include domestic violence shelters, emergency shelters and feeding sites, and residential facilities for dependent and neglected children, among others (see Item #7). How these are considered under FHAA are nuanced based on length of stay and how the facility is operated. All three uses are allowed in all zoning districts with residential uses except Bricktown, two of the downtown design districts, and the historic preservation district. In all cases a special permit review is required. This necessitates a public notification and hearing process before two public bodies, the planning commission and the city council. Disparate treatment may occur if the comments of

decision-makers are discriminatory in nature or the final decision is made based on opinion rather than the criteria in the zoning code. In addition, special requirements that are substantially different than those for other similar residential structures (i.e., single-family) may trigger a claim of disparate treatment. Finally, it is unclear why such uses would be prohibited in the downtown and historic districts, which have strong access to neighborhood amenities.

10. Are mixed-uses allowed and is housing for persons with disabilities and other protected classes permitted where mixed-use is allowed?

Yes, a mix of commercial of residential and uses are allowed in all office and commercial zone districts and dwelling units above the ground floor are allowed in all industrial zone districts. However the land use categories that encompass housing for persons with disabilities are not allowed in all these zone districts. In those zone districts that allow mixed-use:

- “Congregate care housing and convalescent home” is a permitted use only in the C-CBD and all Downtown Design Districts and a conditional use in Tracts 2 and 3 of the Neighborhood Conservation District.
- “Low impact institutional: residential-oriented” is permitted only in the Downtown Design Districts and a conditional use in Tracts 1, 2 and 3 of the Neighborhood Conservation District. It is a special exception use in the Historic Preservation District.
- “Group Residential” is permitted only in C-CBD and three of the Downtown Design Districts.
- “Domestic Violence Shelters,” “Emergency Shelters,” and “Residential Facilities for Dependent and Neglected Children” are a special permit use in all zone districts except Bricktown, two of the Downtown Design Districts, and the Historic Preservation District.

It is unclear how a group of persons with disabilities who do not meet the definition of “family” would be classified, if such a group would be allowed in any zone district, and if so, how that determination is made.

The higher- and medium-density residential zone districts are described as allowing for conditional approval of limited non-residential uses with the intent to reduce dependence on the automobile and supporting population densities that support mass transportation. However none of the residential districts permit commercial uses such as retail sales (i.e., grocery stores) or offices (i.e., medical offices).

11. What types of residential land uses are allowed and what standards apply?

a. *Is there variety in allowed single-family and multi-family residential land uses?*

Yes, a range of housing types are allowed in all residential zone districts and a mix of uses are allowed in the office and commercial zone districts as well as the industrial zone districts. The residential unit classifications specify:

- Single-family residential, described as a single detached dwelling.
- Two-family residential, described as a duplex residence.
- Three- and four-family residential, described as a triplex or fourplex residence.
- Multiple-family residential, described as apartments, condominiums, and townhouses, and excludes “dwelling units and mixed uses” and “senior independent living.”
- Dwelling units and mixed use, described as a building with commercial or office uses and residential uses.
- Manufactured home residential, described as fabricated on or after July 13, 1994, assembled at the building site, and certified that complies with the Federal Manufactured Housing Construction and Safety Standards.
- Manufactured (mobile) home residential, described as a manufactured, detached, transportable single-family dwelling unit not meeting the single- and two-family structure requirements of the Building code.

The PUD process may allow for alternative housing types that are an option to address affordable housing. These include tiny homes, cottage housing, courtyard development, micro-homes, and cooperative housing.

A best practice is to incorporate residential unit classifications, zone districts, and site design requirements for the alternative housing types listed above. This minimizes delay in the approval process, reduces costs, and educates zoning and building officials and the entire community about these housing types and who it will serve.

b. *Do densities and development standards (lot size, height, etc.) support low- and middle-income housing options?*

Yes, densities and development standards support low- and middle-income housing—although improvements could be made.

Only single-family detached dwelling units are allowed in the five lowest density residential zone districts (AA, RA2, RA, R-1, and R-1ZI). Single-family dwelling units are permitted in all residential zone districts and buildings for two – four dwelling units are allowed in the medium- and higher-density residential zones. The two- and four-unit dwelling types are allowed at densities that could serve the “missing-middle” housing gap for low-middle-income households. A best practice is to allow flexibility for “gentle density” such as duplexes to triplexes, to accommodate demand for missing middle housing, promote economic integrate, and meet current preferences in housing. Some communities allow these densities if the units carry a level of affordability (e.g., 80-120% AMI to facilitate middle income ownership).

Infill development in some of these zones are allowed through a “manufactured home overlay district (MH).” The intent of this overlay district is to provide affordable infill housing in areas with little or no new construction. Manufactured homes meeting specific standards may be placed in all residential zone districts except AA, RA, Historic Preservation and Urban Conservation Districts. An area must request this overlay district and there may be opposition to it based on misperceptions about manufactured housing. A best practice is to allow manufactured housing in appropriate residential zone districts.

The R-3 zone district allows up to 17 dwelling units per gross acre and is the only zone that allows a three or four unit residential building and does not allow a “multi-family building.” Residential zone districts with both these unit types (R-3M, R-4M, and R-4) allow density between 19 and 34 dwelling units per gross acre. The R-3 zone may be the only zone district actively addressing the “missing-middle” housing market, but because the density in this zone goes as high as 17 dwelling units per acre, yet this level of density could have the effect of limiting true missing middle housing. Housing densities for these households are better targeted if a zone district with small lots and attached housing types is established with a density range of 8 – 12 dwelling units per acre and/or allows the gentle infill options recommended above. This is not to say that the existing zone districts and allowed housing types do not provide appropriate densities; instead, this statement reflects the tendency of developers to seek the greatest density or largest dwelling unit (i.e., the most units or the unit with the greatest return on investment) in order to maximize profit. When zone districts allow a broad range of densities, the middle-range, serving the lower- and middle-income household, may be squeezed out.

Multiple-family residential includes buildings with five or more dwellings, such as apartments, condominiums, and townhomes. This use is allowed in the higher density residential zone districts (R-3M, R-4M, and R-4), Neighborhood Business (NB), Central Business District (C-CBD), Bricktown, all Downtown Design Districts, and Tracts 2 – 5 of the Neighborhood Conservation District. In all these districts densities between 19 and 34 dwelling units per gross acre are allowed for multiple-family construction. The maximum height in most of these zone districts is 2-1/2 stories of 35 feet, which may constrain achieving the maximum allowed density. It may be difficult to supply the required parking at grade. This may result in parking underground or above ground with the dwelling units over a parking structure. This adds considerable cost to multiple-family construction, impacting the affordability of the dwelling units to both owners and renters. That said, if the city were to consider density bonuses to incentivize affordable housing, a below-market height cap is useful to ensure that developers take advantage of the opportunity.

The land use categories of “senior independent living” and “dwelling units and mixed use” are subject to the same development standards as multiple-family residential.

Manufactured home in a manufactured home subdivision (where the lots are owned by the home-owner), as allowed in the R-MH-1 zone district, requires a 5,000 square foot lot. Consideration for a process to allow smaller lot sizes may be merited to provide additional affordable housing options for this housing type. HUD guidance recommends a minimum lot size of 4,500 square feet and a maximum density of eight dwelling units/acre.

c. *Are accessory dwelling units (ADU) allowed?*

No. Accessory dwelling units are not defined in the zoning code and are not listed as a type of residential use. Section 12.100.1, Lot, area, yards, limits lots for single-, two-, three-, and four-family dwellings to one structure per lot except as allowed by the planned unit development process. It is unclear if ADUs would be permitted in a planned unit development. Typically two or more structures may be permitted in a PUD to allow different types of commercial or multi-family buildings on a single larger lot which is held in one ownership.

A manufactured home may be placed as a temporary second structure in certain zone districts for up to three years. This may be approved by the Board of Adjustment for a “medical hardship” through the special exception process. The occupant of the manufactured home must be the caregiver for the occupant of the primary residence on the lot and must be a relative by blood or marriage. While this provides a housing solution for persons who may be disabled or elderly, by allowing an option to remain in their own home, it is not a permanent housing option available to lower- and middle-income Oklahoma City households. In addition, restricting the caregiver to a person who is related by blood or marriage significantly reduces access to a caregiving option that is best suited to needs.

A best practice is to allow small second units, or accessory dwelling units, in existing single-family zone districts. Such units are smaller than the primary unit and may be internal to an existing single-family home, a detached or connected structure, or a second story on an existing accessory structure (e.g., garage). In some communities, ADUs are also permitted in two-family dwelling units and townhomes. The ADU offers an alternative housing type that may permit a household to age in place, make a home affordable to a family, and increase housing options for lower-income one and two-person households. Neighborhood concerns about the additional gentle density can be addressed by requiring that the owner renting the ADU live onsite and that ADUs not be used as vacation rentals.

d. *Is design review required for multi-family housing or group living?*

Design review is required in certain zone districts. Although design standards are useful in creating a desirable built environment, they can raise costs and may communicate exclusivity. As such, design standards should be reviewed frequently for such barriers and the committees reviewing design compliance must be aware of the potential negative impacts.

- Urban Design Overlay District, including the Asian District, Paseo, Capitol Hill, and property along NW 23rd St. corridor
- Historic Preservation District and Historic Landmark Overlay District
- Neighborhood Conservation District – (Tract 4G and restrictions on materials in all tracts)
- Bricktown Urban Design District
- Downtown Design District
- Scenic River Overlay Design District, with six subdistricts
- Stockyards City Development District
- Northeast Gateway Urban Conservation District requires review to “Multiple-family (four or more units) uses or districts” as well as commercial and institutional (total of 11 Urban Conservation Districts)

e. ***Are there special site improvement standards for certain types of housing?***

No, there are no site improvement standards applicable to only certain types of housing. Special use standards apply to the following:

- Congregate care housing and convalescent home: Special setback requirements for off-street parking and loading spaces in certain zone districts when adjacent to specific residential zone districts.
- Domestic violence shelter, Emergency shelters and feeding sites, Residential facilities for dependent and neglected children, Forced detention or correction facilities, Residential facilities for drug or alcohol treatment centers, and Transitional mental health residential facilities: Program and staff details required in application, identification of other such facilities within one mile, consideration of “overconcentration” and decision made, in part, on “the differences or similarities in existing uses among these use units and the compatibility or incompatibility of such uses in the particular area.” (see Item #9)

Spacing requirements imposed on housing occupied by certain protected classes can be found to violate the FHAA. Spacing requirements should also be reviewed carefully to ensure that they do not in effect prohibit housing for certain protected classes. Furthermore, spacing requirements can be challenged on the basis that they lack scientific evidence or demonstrated public health

benefits. Considerations regarding overconcentration is a legitimate concern—yet one that needs to be balanced against the right of persons with disabilities and other protected classes to choose where they live.

12. Does the zoning code describe any areas as exclusive?

No areas are described as exclusive.

13. Are there restrictions for senior housing and if so, do the restrictions comply with Federal law on housing for older persons?

“Senior Independent Living” is a defined residential use unit. Since the definition does not include any age-specific requirements, there may be confusion regarding compliance with FHAA and the Housing for Older Persons Act (HOPA), which could be bolstered in the code.

The familial status protection prohibits exclusive communities of “adults only” that do not allow families with children. HOPA was enacted to allow an exemption to this protection for senior housing communities. To qualify for the exemption, 100 percent of the dwelling units in such communities must be for persons aged 62 or older. In addition communities may be exempt if 80 percent of the dwelling units are limited to at least one of the residents of the unit being aged 55 or older. The 55 or older communities must follow HUD’s age verification requirements and publish policies that shows the intent to operate as a “55 and over” community.

14. Is senior housing a specific land use and if so, is a special or conditional use permit required but is not required for single-family or multi-family residential uses?

“Senior Independent Living” is a residential use allowed by right in four zone districts: R-4M, R-4, C-2, and C-3. These are the only zone districts where this use is permitted. This use receives the same review process as single-family and multi-family uses in the R-4M and R-4 zones.

It should be noted that several other residential zone districts also allow the same single-family and multi-family dwelling units as in the two residential zone districts that support Senior Independent Living, but the other zone districts do not permit Senior Independent Living as a use (R-3, R-3M). The reason is unclear. Multiple-family residential is allowed as a conditional use in the C-3 zone district and not allowed in the C-2 zone, while Senior Independent Living is a permitted use in both these commercial zone districts. However, both these zones permit “dwelling units and mixed-use.”

15. Is a conditional or special use review permit required for housing for persons with disabilities but is not required for single-family or multi-family residential uses?

“Low impact institutional: residential-oriented” is a permitted use in all residential zone districts except the two mobile home zone districts, in all the downtown design districts, and in Tracts 1, 2, and 3, of the neighborhood conservation district. It is not

allowed in any other districts except the historic preservation district where it requires a review through the special exception process. Multiple family also is processed as a special exception in this zone district, but single-family residential is a permitted use, with no special review beyond the requirements of the historic preservation zone district. While “low impact institutional: residential-oriented” is broadly defined to include a variety of group living situations which may or may not be for persons with disabilities, there may be a conflict with FHAA when it is a residence for persons with disabilities. This use is permitted the same as single-family residential in all other residential zone districts (excepting the two zone districts for mobile homes) and it is unclear why it would be treated differently in the historic preservation district.

Since the code is silent on the number of persons that can reside in a “low-impact institutional: residential-oriented” facility, it is likely that a facility that does not meet the occupancy limit of five or fewer unrelated persons, set in the definition of “family,” is enforced. A single-family dwelling is defined as “a building designed for occupancy by one family.” This means that a “low-impact institutional: residential-oriented” for six or more persons, with or without a disability, is not allowed in any of the residential zone districts. There is no definition for a facility for six or more persons, making it unclear where such facilities could be located. The “group residential” category may where the six or more facility is placed, but this type of facility is only allowed in five zone districts, only one of which is residential in nature (R-4). While the definition does not limit “group residential” to persons with disabilities, and all groups fitting this use classification are subject to the same zone districts, the comparison is to how a facility for persons with disabilities is treated with regard to other residential uses, not how it is treated compared to other groups in the same land use classification.

Also of note is that separate land use categories (use unit classification) are established for domestic violence shelters, emergency shelters and feeding sites, and residential facilities for dependent and neglected children. How these are considered under FHAA are nuanced based on length of stay and how the facility is operated. All three uses are allowed in all zoning districts with residential uses except Bricktown, two of the downtown design districts, and the historic preservation district. In all cases a special permit is required. This necessitates a public notification and hearing process before two public bodies, the planning commission and the city council. Discriminatory treatment may occur if the comments of decision-makers are discriminatory in nature or the final decision is made based on opinion rather than the criteria in the zoning code. In addition, special requirements that are substantially different than those for other similar residential structures (i.e., single-family) may trigger a claim of disparate treatment.

16. Are there any references to fair housing or a statement about fair housing in the zoning code?

There are no references to FHAA. Section 25-39, Discrimination in housing, prohibits discrimination based on age, familial status, disability, race, color, sex, sexual orientation, gender identity, religion, creed, ancestry, or national origin in lending and real estate transactions.

17. Are there specific references to the accessibility requirements of FHAA or ADA in the development codes?

a. Are there minimum standards for handicap parking for multi-family housing?

Section 59-10650, Accessible Parking Space Requirements, establishes accessible parking space requirements based on the total number of required parking spaces. The accessible spaces must be provided for any commercial, industrial, and residential use that has a parking requirement established by the zoning code. The same accessible parking requirements are in the Building Code, and these reflect the ADA standards for minimum number of accessible parking stalls.

b. Are there standards for accessible routes (e.g., sidewalks and access through parking lots)?

Section 12100.2, Use and Structure Regulations, requires sidewalks along major and minor arterial streets in the case of new construction and when residential is converted to a more intense use. Sidewalks are to be constructed "in accordance with the Subchapter II of the American With Disabilities Act, 42 U.S.C. § 12131, et seq., as amended, and the regulations promulgated there under ("ADA')." Single-family residential lots fronting arterial public streets, used for residential purposes, are exempt from this requirement. Single-family and two-family lots platted prior to 2007, with frontage on an arterial, are also exempt.

Section 10600.4 Parking Lot Design, also requires internal pedestrian access ways, a minimum of five feet in width, be incorporated in parking lot design. Specific references to ADA requirements for surfacing materials and demarcating the pedestrian routes are included.

Other considerations. Somewhat unique to Oklahoma City is a state-enacted zone district known as the "Capitol-Medical Center Improvement and Zoning District" (CMC). Title 73 of the state statutes sets the boundary of this zone district and authorizes the Capitol-Medical Center Improvement and Zoning Commission to establish and enforce zoning and improvement regulations for the district. These regulations are based on a master plan for the area and are contained in administrative rules adopted by the CMC Commission. Although not responsible for the enactment nor the processing of land use and development permits in this zone district, the zoning regulations for this district are adopted by the City Council of the City of Oklahoma City for the purposes of enforcement (Oklahoma City Municipal Code, 2010 Section 59.7400-2). Code violations of this zone district are prosecuted in municipal court upon action by the CMC Commission.

Some zoning regulations are the same between the two codes, such as the definition of “family.” Where the regulations are similar, the concerns identified in the assessment of the Oklahoma City Zoning and Planning Code hold true for the CMC zone district. There are also some differences in the two sets of regulations regarding the range of land uses allowed and certain procedures. This means that group living facilities may be treated differently in the CMC zone district than the zone districts established by the Oklahoma City Zoning and Planning Code.

Examples of different land use categories for “special group residential housing” found in the CMC zone district that are not found in the Oklahoma City Zoning and Planning Code are:

- Drug treatment center or halfway house—defined as a temporary residence for persons recovering from treatment for chemical dependence, alcoholism, or psychological illness and no counseling or treatment is provided, excluding "halfway house or sober houses" as defined by the Americans with Disabilities Act;
- Group home, for temporary residency in independent sleeping and living quarters;
- Geriatric care center;
- Rehabilitation center;
- Intermediate care facility; and
- Juvenile treatment center, residential.

Group residential housing options not specifically listed as an allowed use in the CMC zone district would require a determination as to whether it meets the definition of one of the listed uses or needs a hearing to determine if it should be added as a land use category.

The most notable difference in procedures between the two sets of regulations is that the CMC zone district has a reasonable accommodation process while the Oklahoma City Municipal Code does not. Section 120:10-5-25, Reasonable accommodation permit, allows the owners or operators of a halfway house to seek a conditional use approval of this use “when such accommodation may be necessary to afford persons with disabilities an equal opportunity to use and enjoy a dwelling.” All halfway houses for persons with disabilities in a zone district with residential uses must be approved through the reasonable accommodation process, and this is different from the review processes and procedures that may be required in the zoning districts regulated by the Oklahoma City Zoning and Planning Code. Because the definition of “drug treatment center or halfway house” includes persons recovering from “psychological illness,” it is unclear how facilities for persons with mental disabilities may be treated. It should be noted that HUD guidance on the application of FHAA in land use laws states that:

“Although a group home for persons in recovery may commonly be called a “sober home,” the term does not have a specific legal meaning, and the Act treats persons with disabilities who reside in such homes no differently than persons with disabilities who reside in other types of group homes.”²

The reasonable accommodation process in the CMC district allows for equal treatment, although the use of the term “halfway house” in the reasonable accommodation process implies the process may be limited only to a group living situation meeting the definition for “drug treatment center or halfway house” in the CMC district regulations.

Also of note is that accessory dwelling units (ADUs) are allowed in the CMC zone district but are not allowed under the Oklahoma City Zoning and Planning Code. ADUs may be approved in the RD-1 and RD-2 residential districts through a conditional use permit. Such units may be occupied by no more than one person, constructed on the rear property line, and have a floor area of 50 percent or less of the main building on the parcel. ADUs are allowed only on property with owner-occupied homes. As noted previously, ADUs allow for infill development and help to increase affordable housing options in the community.

² Joint Statement of the Department of Housing and Urban Development and the Department of Justice, State and Local Land Use Laws and Practices and the Application of the Fair Housing Act, November 10, 2016

SECTION IV.

ACCESS TO OPPORTUNITY

SECTION IV.

Access to Opportunity

This section examines the extent to which members of protected classes experience disparities in access to opportunity measured by access to education, employment, and transportation. It also discusses challenges faced by persons with disabilities. The analysis is based on HUD opportunity indicators, interviews of stakeholders, findings from the resident and stakeholder focus groups.

Primary Findings

- Compared to other cities in the Oklahoma City region and Tulsa, African American and Hispanic residents in Oklahoma City are more likely to live in high poverty neighborhoods. In fact, Non-Hispanic White and Asian residents living below poverty in Oklahoma City have better access to low poverty neighborhoods than do African American and Hispanic residents overall. This is a factor of the concentration of many African American and Hispanic residents in a handful of high-poverty neighborhoods within the city.
- African American, Hispanic, and Native American children have lower access to high performing elementary schools relative to Non-Hispanic and Asian children. This is true for many cities in the region and for Tulsa. Only Edmond demonstrates high levels of proficiency for students across races and ethnicities and income levels.
- Oklahoma City offers equal access to jobs among races and ethnicities and income levels. Yet there is significant disparity in unemployment and educational attainment among residents, meaning that not all residents can benefit from city's labor market. Expanding employment access and opportunities for Hispanic, African American, and Native American residents would benefit these residents and the city overall.
- Residents and stakeholders who participated in focus groups about barriers in access to economic opportunity focused on inadequate transportation—especially public transit to serve persons with disabilities; needed accessibility improvements and more equitable distribution of quality parks; and equity in education.

HUD Opportunity Indicators

HUD provides several “opportunity indices” to assess and measure access to opportunity in a variety of areas, including education, poverty, transportation, and employment. The opportunity indices allow comparison of data indicators by race and ethnicity, for households below the poverty line, and among jurisdictions. They are also a good starting point for the opportunity analysis, identifying areas that should be examined in more detail.

The HUD opportunity tables—specifically the following six indices in the tables—were the starting point for this Access to Opportunity analysis.

To interpret these indices, use the following rule: a higher number is always a better outcome. The indices should be thought of as an “opportunity score”, rather than a percentage.

The indices include the:

- **Low Poverty Index.** This index measures neighborhood exposure to poverty, with proximity to low poverty areas considered to be an advantage. Higher index scores suggest better access to economically strong (i.e. low poverty) neighborhoods.
- **School Proficiency Index.** This index measures neighborhood access to elementary schools with high levels of academic proficiency within 1.5 miles. Proficiency is measured by 4th grade scores on state-administered math and science tests. HUD uses elementary school scores only for this index because they are typically more reflective of school quality and access at the neighborhood level. Middle and high schools draw from larger boundaries and, especially in high school, have more transportation options.
- **Labor Market Engagement Index.** This index measures the employability of neighborhood residents based on unemployment, labor force participation, and educational attainment. Higher index scores suggest residents are more engaged in the labor market.
- **Jobs Proximity Index.** The jobs proximity index indicates how close residents live to major employment centers. The higher the index, the greater the access to nearby employment centers for residents in the area.
- **Transit Index.** The transit index measures use of public transit by low income families that rent. The higher the index, the more likely that residents in the area are frequent users of public transportation.
- **Low Cost Transportation Index.** This index measures the cost of transportation, based on estimates of the transportation costs for low income families that rent. Higher index values suggest more affordable transportation.

Low poverty index. Figures IV-1a and IV-1b present the values of the low poverty index for Oklahoma City and comparative jurisdictions by race and ethnicity. The top figure shows the index for all residents, while the bottom figure is restricted to residents with incomes below the poverty level. Higher values mean better access to low poverty environments and, conversely, lower numbers mean residents are more likely to live in neighborhoods of concentrated poverty.

For residents overall, Oklahoma City shows the largest variance between Non-Hispanic White and Asian residents and African American and Hispanic residents. This is true even for residents living in poverty. The indices suggest that African American and Hispanic residents in Oklahoma City are more likely than comparable residents in other cities to live in high poverty neighborhoods.

Figure IV-1a. Low Poverty Index, Total Population

Note:
Higher numbers indicate greater access to low poverty neighborhoods.

Source:
Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Low Poverty Index.

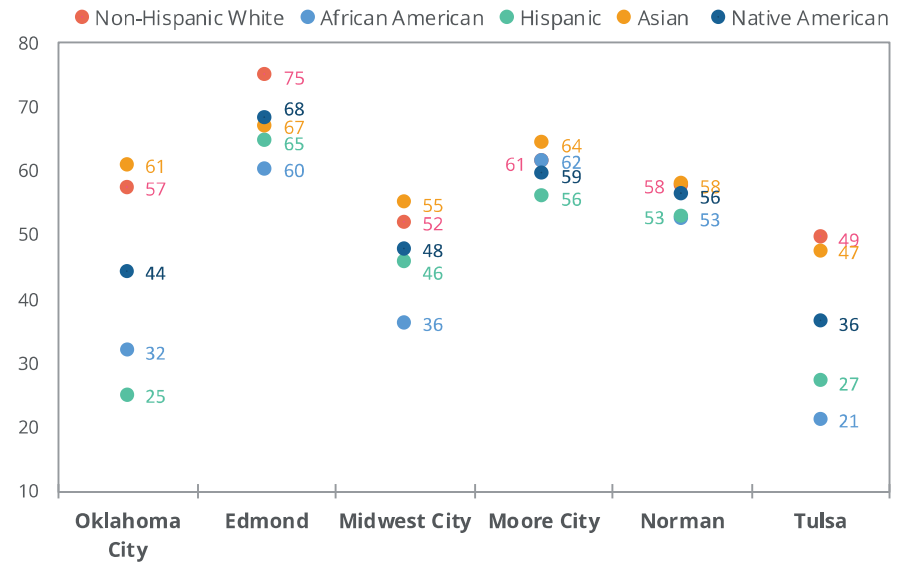
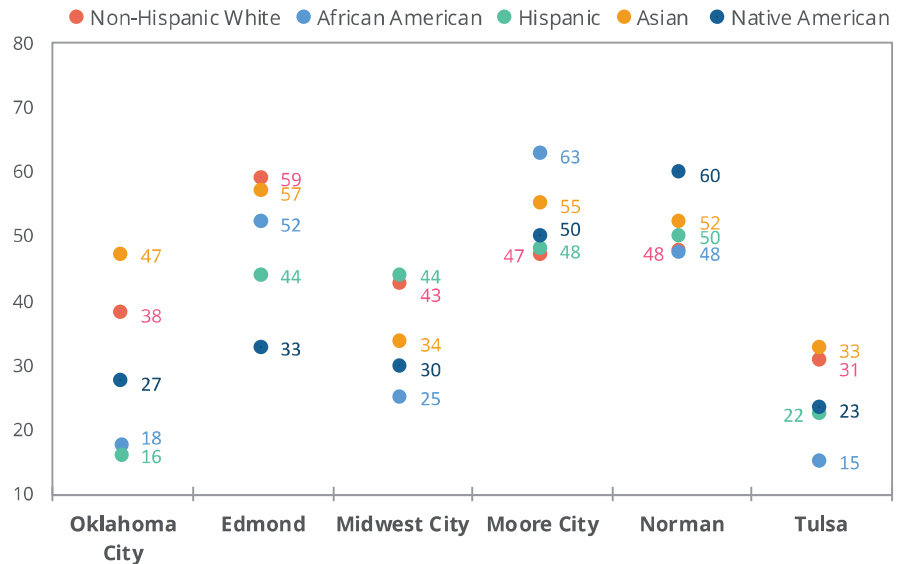


Figure IV-1b. Low Poverty Index, Population Below the Poverty Line

Note:
Higher numbers indicate greater access to low poverty neighborhoods.

Source:
Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Low Poverty Index.



School proficiency index.

Figures IV-2a and IV-2b present the values of the school proficiency index by race and ethnicity. Higher values mean better access to high-performing schools and lower numbers mean worse access.

Edmond stands out for having equal access to high-performing schools regardless of a child's race or poverty level. Oklahoma City shows a moderate variance to access by race and ethnicity, similar to Tulsa. Oklahoma City shows better access for African American children than Tulsa, particularly for children living in poverty. Access for Native American children is moderate in most communities, with Edmond being the exception.

Figure IV-2a. School Proficiency Index, Total Population

Note:
Higher scores indicate greater likelihood of access to proficient schools.

Source:
Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, School Proficiency Index.

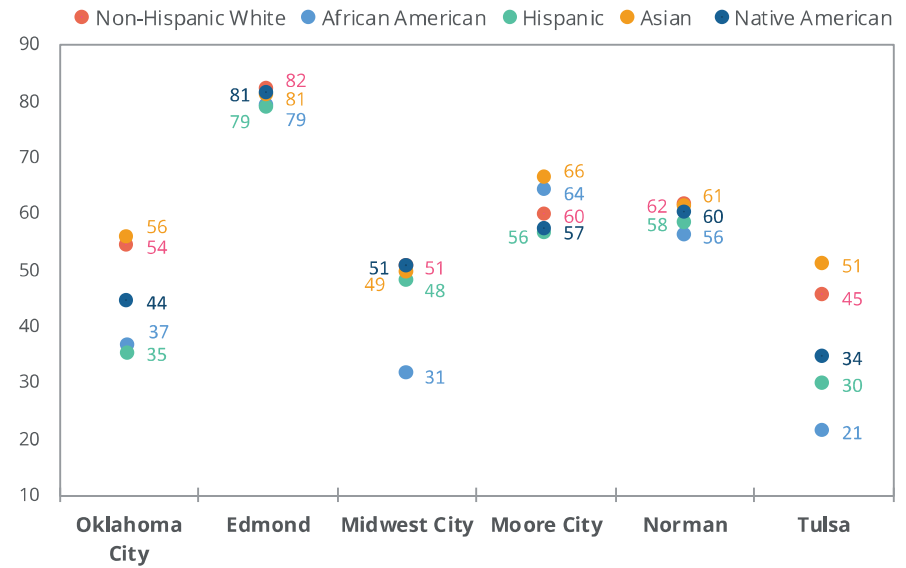
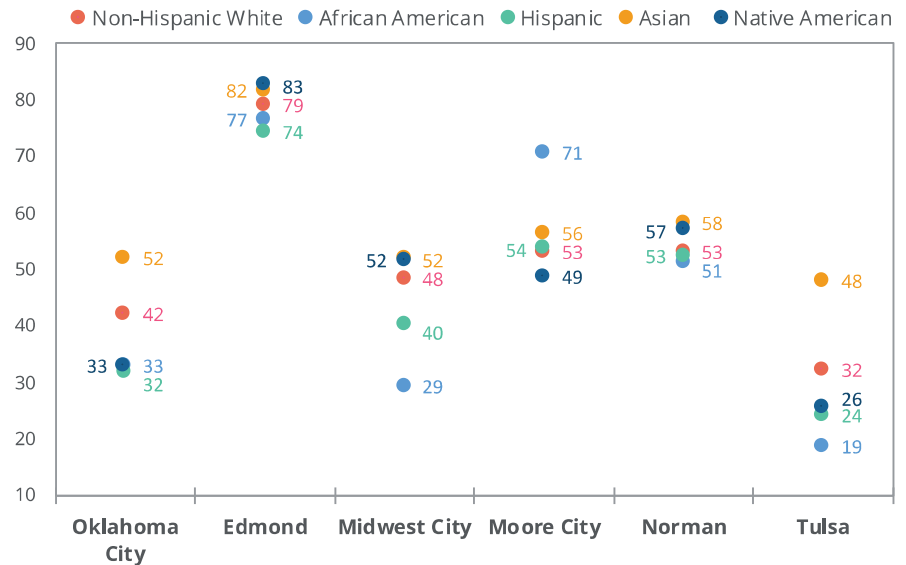


Figure IV-2b. School Proficiency Index, Population Below the Poverty Line

Note:
Higher scores indicate greater likelihood of access to proficient schools.

Source:
Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, School Proficiency Index.



Labor market engagement index. Figures IV-3a and IV-3b present the values of the labor market engagement index for each by race and ethnicity. Higher values indicate higher employability of residents.

Oklahoma City and Tulsa both stand out for their relatively low levels of labor market engagement for Hispanic residents. Oklahoma City has stronger labor market engagement for African American residents than Tulsa and is about the same as Midwest City.

For residents living in poverty, engagement is low in Oklahoma City and Tulsa. Midwest City, Moore City, and Norman show little variation by income. Edmond shows the largest shift in labor market engagement for residents in poverty. To the extent that residents occupy jobs in the communities in which they live, this indicator reflects opportunities within local job markets.

Figure IV-3a. Labor Market Engagement Index, Total Population

Note:
Higher numbers indicate greater levels of employability of residents.

Source:
Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Labor Market Engagement Index

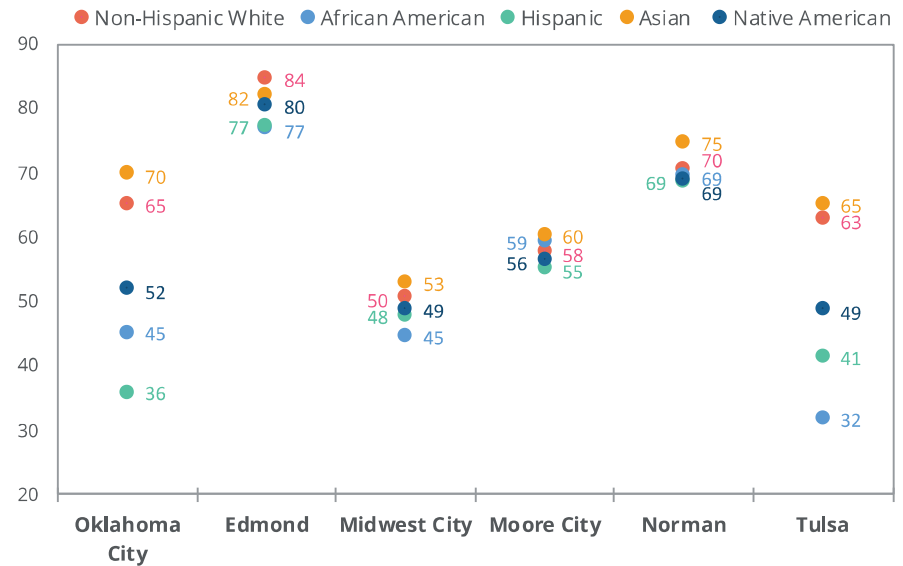
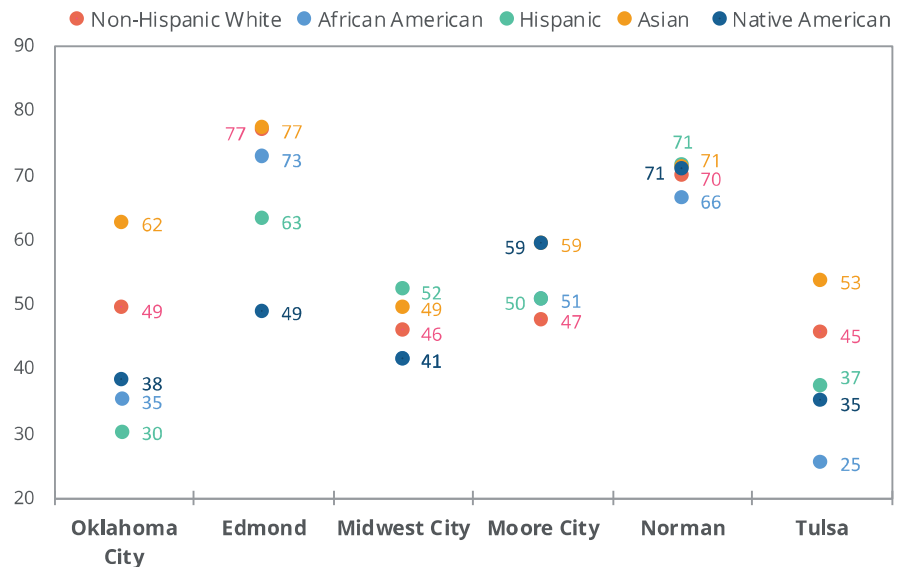


Figure IV-3b. Labor Market Engagement Index, Population Below the Poverty Line

Note:
Higher numbers indicate greater levels of employability of residents.

Source:
Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Labor Market Engagement Index



Job proximity index.

Figures IV-4a and IV-4b present the values of the job proximity index for each jurisdiction by race and ethnicity.

This is the only indicator where the results differ dramatically between all residents and residents living in poverty. For all residents, proximity to jobs is moderate and differs little by race and ethnicity (with two exceptions).

Oklahoma City offers equal access to jobs, both among races and ethnicities and between all residents and residents living in poverty.

Edmond scores highest on access to jobs for Hispanic and African American residents living in poverty. Midwest City, Moore City, and Normal show more variation for residents in poverty, while Tulsa shows little change.

Figure IV-4a. Job Proximity Index, Total Population

Note:
The higher the index, the greater the access to nearby employment centers for residents in the area.

Source:
Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Job Proximity Index.

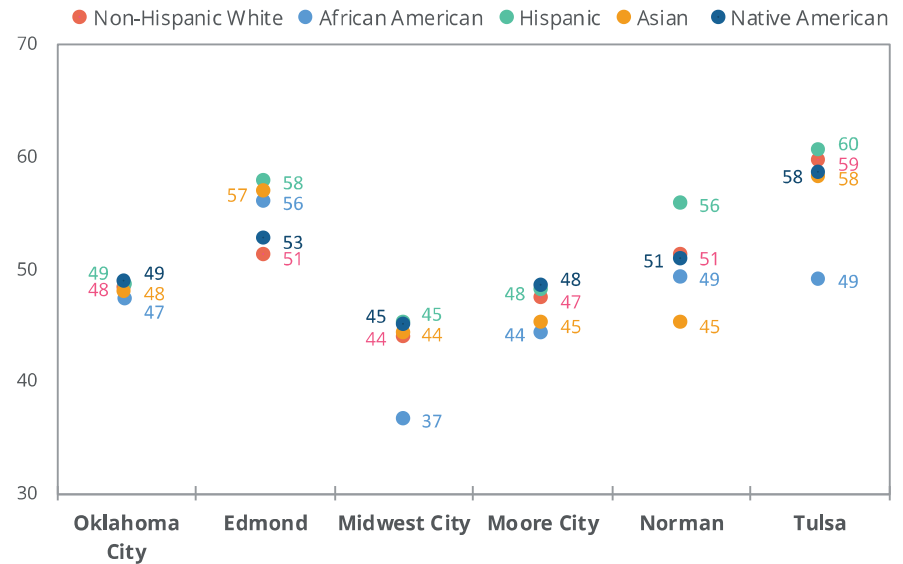
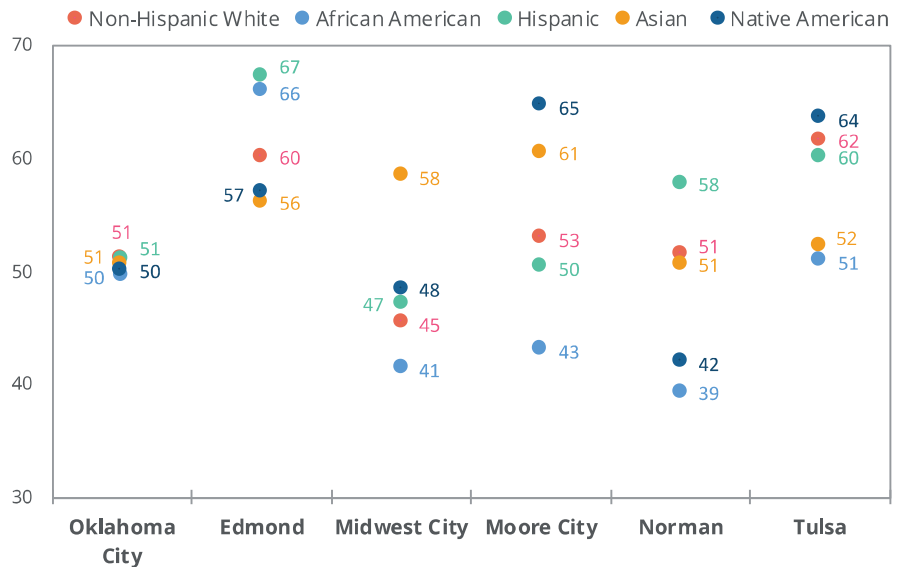


Figure IV-4b. Job Proximity Index, Population Below the Poverty Line

Note:
The higher the index, the greater the access to nearby employment centers for residents in the area.

Source:
Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Job Proximity Index.



Transit index. Figures IV-5a and IV-5b present the values of the transit index for each jurisdiction by race and ethnicity.

The indicators suggests no meaningful differences by race or ethnicity within the jurisdictions. Tulsa has the best access to transit of any of the jurisdictions yet the overall score is still low—less than 40 on a scale of 0 to 100.

Figure IV-5a. Transit Index, Total Population

Note:
The higher the index, the more likely that residents in the area are frequent users of public transportation.

Source:
Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Transit Index.

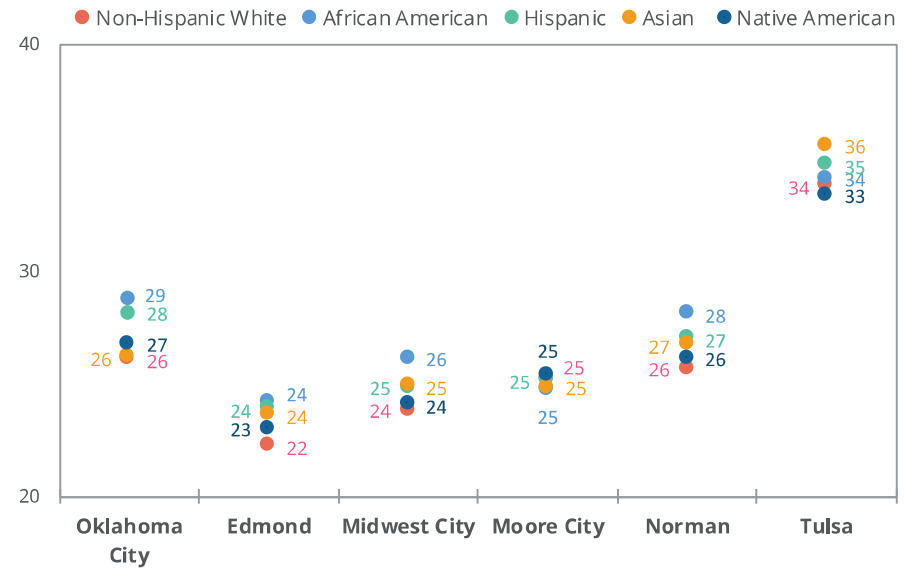
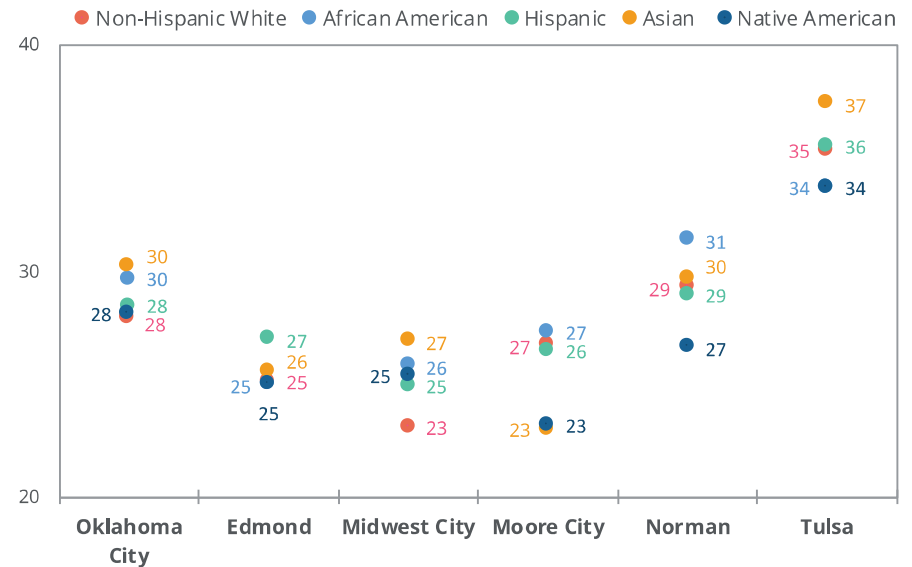


Figure IV-5b. Transit Index, Population Below the Poverty Line

Note:
The higher the index, the more likely that residents in the area are frequent users of public transportation.

Source:
Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Transit Index.



Low cost transportation index. Figures IV-6a and 6b present the values of the low cost transportation index.

There is little variation among communities, among racial and ethnic groups, and among all residents and those living below the poverty level. In general, transportation is moderately affordable for residents in the region regardless of where they live or their income level.

Figure IV-6a. Low Cost Transportation Index, Total Population

Note:
Higher index values suggest more affordable transportation.

Source:
Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Low Cost Transportation Index.

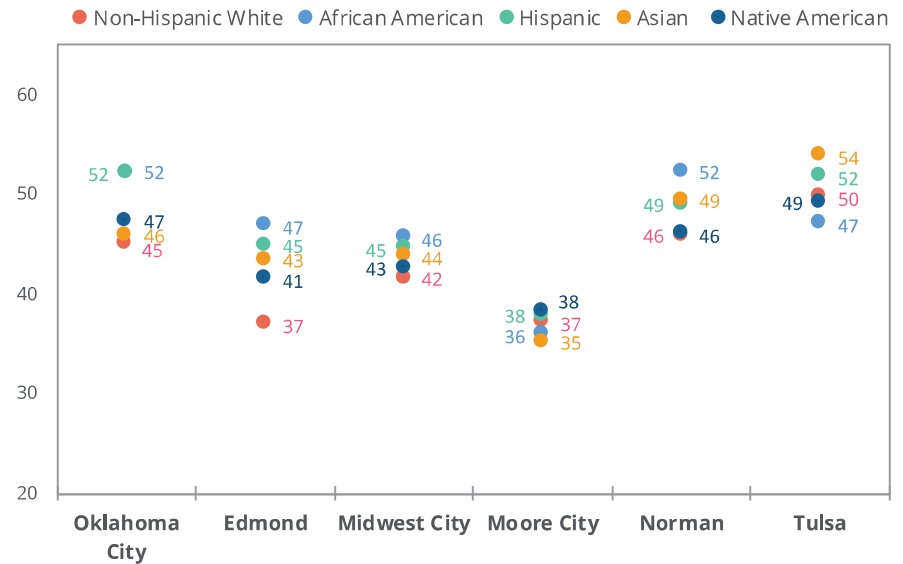
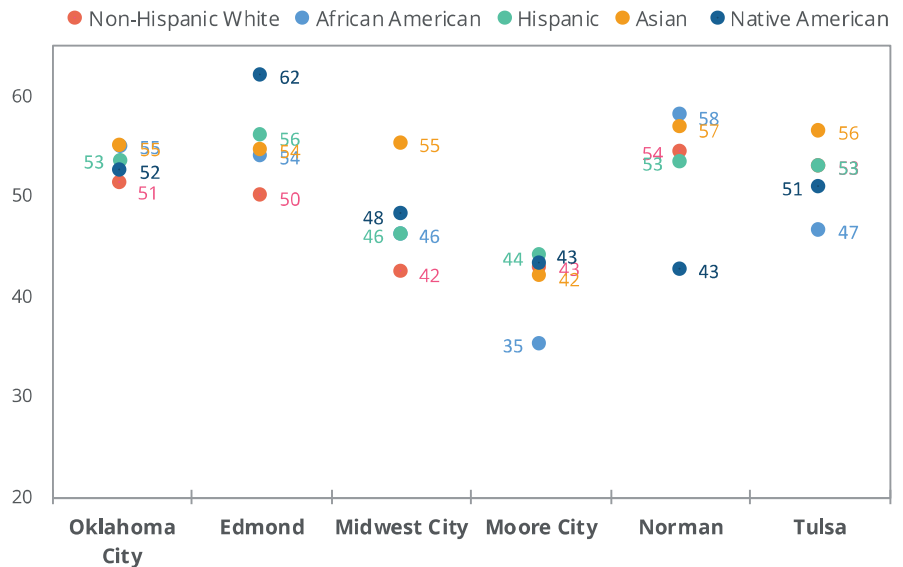


Figure IV-6b. Low Cost Transportation Index, Population Below the Poverty Line

Note:
Higher index values suggest more affordable transportation.

Source:
Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Low Cost Transportation Index.



Resident and Stakeholder Perspectives

The balance of this section discusses access to opportunity from the perspective of the residents and stakeholders who participated in focus groups for the AI. The focus groups reveal barriers that cannot be found in the data indicators. They are also useful to understand how typically under-represented groups view equity within the city. These perspectives are organized by access to opportunity topic.

Education. At the time this AI was prepared, Oklahoma City schools was in the process of implementing its “Pathway to Greatness” or P2G. Since enrollment peaked at nearly 80,000 students in the mid-1960s, Oklahoma City school enrollment has fluctuated around 40,000 students and has been trending downward since 2014. Racially and ethnically, a little more than half of children in the district are Hispanic, 22 percent are African American, 14 percent are Non-Hispanic White, and 5 percent are multi-racial. Students in the district move frequently, with less than 60 percent enrolled during the entire school year. Three quarters of students qualify for free and reduced lunch programs.

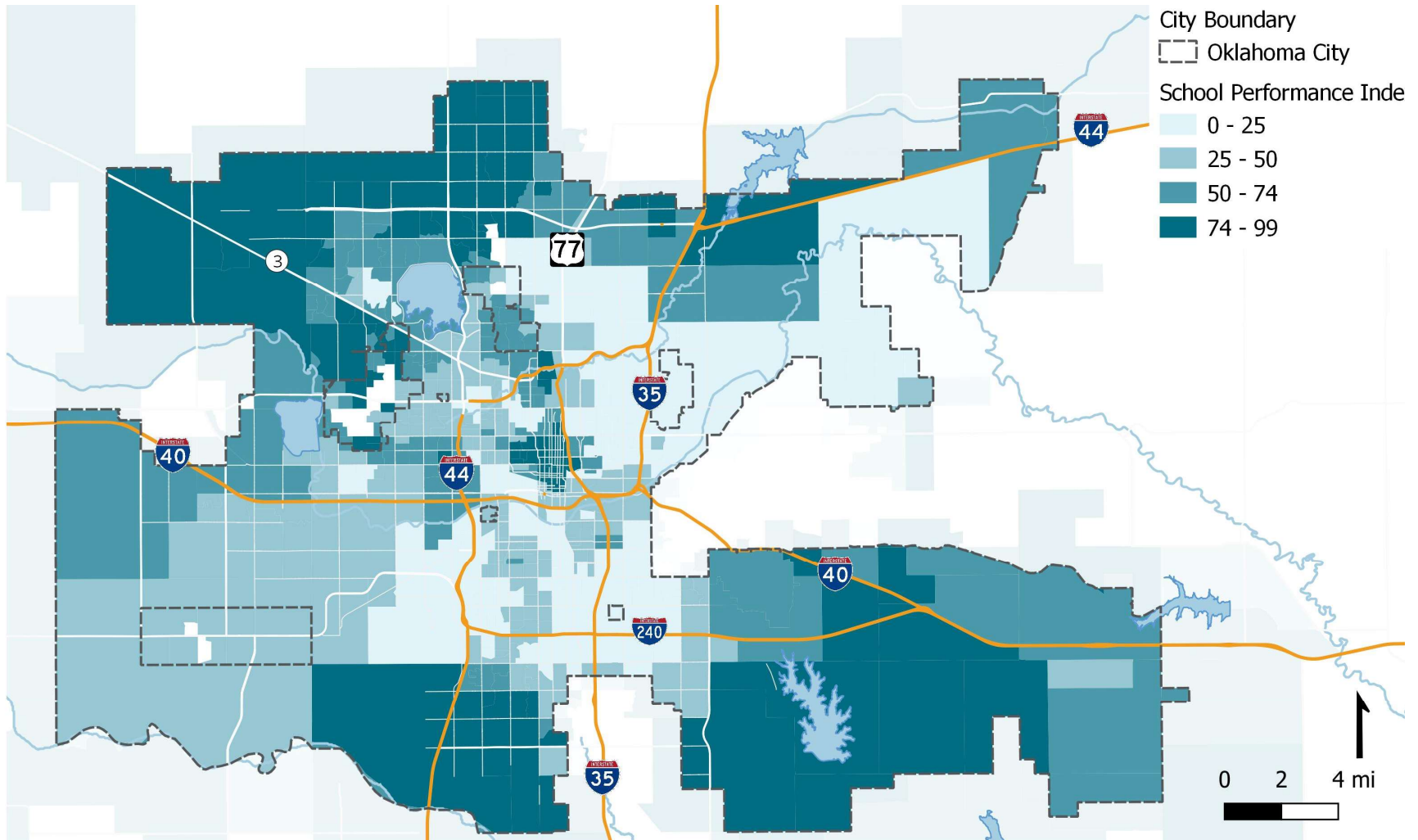
P2G is an ambitious plan that required closing schools, relocating schools, and reconfiguring existing schools. As reported in the Black Wall Street Times, before P2G, the Oklahoma City school district served more than 40,000 students among 79 schools. That means that there is an average of 506 students attending each school. In contrast, the high-performing Edmond Public Schools services 23,966 students in a total of 25 schools, with an average of 958 students per school.¹ Consolidating schools should improve academic and enrichment offerings and align the district’s budget with the core components of academic success—instruction rather than building maintenance.

These changes are being implemented throughout the city according to a map in P2G, with many school closures and relocations in the central portion of the city, and new middle schools in the south. Although some of these areas align with Hispanic and African American concentrations and R/ECAPs, the impact is broader than those areas and more closely correlated with school performance.

Figure IV-7 shows differences in access to high performing schools at the elementary school level, according to the HUD school proficiency index.

¹ “Why school closings in OKCPS may be a step toward equity,” Autumn Brown, December 27, 2019.

Figure IV-7.
Access to High Performing Schools by Census Block Group



Source: HUD AFFH Raw Data, February 2018.

It is too early to tell how P2G will address the inequities in access to high proficiency schools discussed earlier in this section. A mid-January 2020 update from the district reports positive progress in utilization, better student-teacher ratios, lower class sizes, and expanded sports, arts, and STEM programming.

Some residents expressed concern about the plan, mostly about schools being closed in the northeast and the lack of grassroots engagement for the plan. Residents would have liked more transparency about the decision to close schools. Residents also felt that the district events about P2G should have been more intentional in places where neighbors gather—e.g., after church services.

Residents perceive inequities in resources among the city's schools, with lower income schools the most under-resourced. Some questioned the process for deciding how voter-approved funding (MAPS) is allocated and perceive that schools in the northeast never seem to benefit from increased funding.

General community amenities. When asked about equal distribution of community amenities in the city, residents identified several areas where they feel neighborhoods in the northeast and the south are underserved:

- Lack of safe and quality recreation opportunities (pool, gym, parks) and grocery stores in the northeast.
- Lack of grocery stores and gas stations in Capitol Hill.
- Neighborhoods in the south never had the same quality of parks or other amenities as found in other parts of the city.
- There is a general perception that residents living south of the river are not part of OKC; the city has historically ignored the neighborhood and now the neighborhood is cut off from new amenities (the example provided is the sidewalk path of Scissor Tail Park which ends before a neighborhood that is largely Hispanic).

Some residents attribute these differences in amenities to lack of representation by leadership and access to leadership. One resident mentioned frustration that City Council meetings are on Tuesdays at 8:30 a.m., making it difficult for working residents to attend. Important planning meetings held on Wednesday evenings when most of the Black community is at church. There is also a perception that board members of Community Housing and Development Organizations (CHDOs) are not true representatives of neighborhoods and are instead “friends of power brokers.”

Transportation. Lack of reliable and accessible transportation, particularly for persons with disabilities, was frequently raised as an access to opportunity barrier.

- Many residents said they do not use the bus because it is unreliable: *“It can take an hour to reach a destination that’s a 10 minute drive.”*
- Many stops are not accessible to people with mobility disabilities.

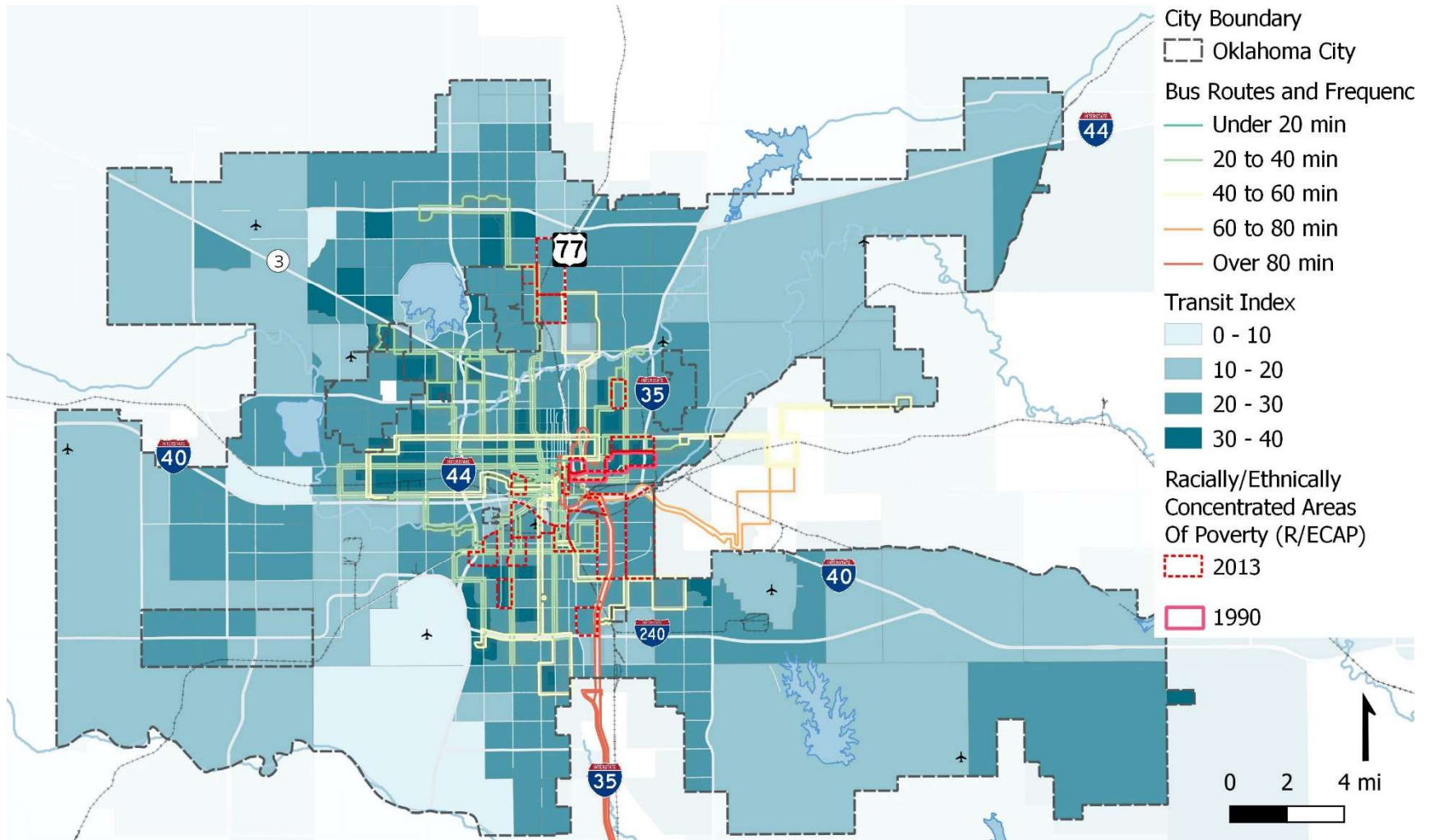
- There are no shelters for shade or protection from the elements.

The Center for Neighborhood Technology (CNT) measures gaps in transit connectivity, access, and frequency. CNT analyzes data on station, stop, and frequency data for bus, rail and ferry service for areas with populations greater than 100,000, as well as some subareas.

According to CNT data, 42 percent of households in Oklahoma City are underserved by transit. Geographically, the CNT-identified underserved areas are clustered in the east and northeast, north of downtown, and in suburban neighborhoods to the west. Much of the southern part of the city is adequately served by transit.

Figure IV-8 shows the frequency of buses in 20 minute increments, overlaid with R/ECAPs. The map is generally consistent with the CNT findings in that it shows that frequent transit is more limited in the northeast, east, southeast, and southwest—particularly in the more suburban areas of the city.

Figure IV-8.
Transit Frequency and R/ECAPs



Source: EMBARK General Transit Feed Specification data and posted frequencies.

Access for persons with disabilities. Many residents complimented the city for its persistent work on repairing sidewalks and streets and public facilities. Stakeholders reported that many areas of the city that draw visitors are accessible, making residents with disabilities feel very welcome. The exception is some parks and older neighborhoods, whose infrastructure can be challenging.

Where improvements need to be made to address barriers for persons with disabilities, they are mostly in housing and transportation. These include:

- A significant lack of accessible housing for very low income people with disabilities (0-30% AMI, equivalent to SSI income).
- Lack of proper building inspection by the city to ensure compliance with Fair Housing Act requirements for new construction and design—both for market rate multifamily units and units with federal funds. Some stakeholders noted that units may meet Fair Housing Act requirements on paper (plans), but not as constructed. City compliance audits should occur throughout the building process.
- Group homes have a lot of staff turnover, which is very hard on consumers.
- Many residents said there is a lack of access to parks for persons with disabilities, due to location and design.
 - *“I really wish there were a park closer to my house I could go to.”*
 - *“The zoo is accessible, but it is very hilly!”*
 - *“My wheelchair is very heavy and sometimes gets stuck in the mud. I really wish there were a park with swings I could use with a flat surface underneath”*
- Inadequate transportation for persons with disabilities was a common theme for residents. Most agreed that there is essentially no functional paratransit in the city for people with heavy powerchairs. Paratransit is also expensive at \$3.50 for a one way trip.
- The Oklahoma Foundation for the Disabled supplements transportation to fill gaps in provision—but they are significantly under-reimbursed. They serve 60 people *per day* and receive reimbursement of \$35 *per person per month*.
- Discrimination by the public at large still exists and is a problem in the city and statewide.
 - *“People with disabilities are ‘the forgotten ones.’ People at the Capitol don’t think about this world.”*

SECTION V.

IMPEDIMENTS AND FAIR HOUSING ACTION PLAN

SECTION V.

Impediments and Fair Housing Action Plan

The city of Oklahoma City, as a recipient of federal housing and community development funds, is required to take actions to reduce barriers to fair housing choice. This document—the city’s updated Analysis of Impediments to Fair Housing Choice, or AI—identifies the primary impediments to fair housing choice and recommends a five-year action plan to reduce barriers. It addresses both barriers to housing choice and access to opportunity, as economic factors play a significant role in attaining housing.

Community Engagement

The community engagement activities that supported the development of the AI and identification of impediments included:

- Three focus groups with private and public affordable housing developers and social service providers and case managers;
- Interviews with housing providers, including those serving extremely low income residents and persons experiencing homelessness, as well as civil rights and housing advocates;
- Focus groups with residents most vulnerable to housing discrimination and impediments to housing choice. These included residents of Hispanic descent living in the southern part of the city (8 participants), African Americans living in the northeast (4 participants), and residents with developmental disabilities and staff (9 total).

Past Impediments to Fair Housing Choice

The city’s last Analysis of Impediments to Fair Housing Choice (AI) was completed in 2014. That AI found the following barriers to housing choice. Those barriers that were also identified in this AI update are noted:

Impediment: More frequent denial of home purchase loans to Black, Hispanic, and female applicants, based on a review of home purchase loan data collected under the Home Mortgage Disclosure Act (HMDA). The analysis also found higher loan denials in areas with high concentrations of Black and Hispanic residents.

This impediment remains, particularly for African Americans even after adjusting for income.

Recommended actions to address: Enhance outreach and education to first time homebuyers and track the number of homebuyer education and training sessions offered. This should include financial literacy training.

Impediment: Predatory style lending —as defined by high interest loans—falls more heavily on Black and Hispanic borrowers and neighborhoods in which they are concentrated.

This impediment remains: Hispanic borrowers received subprime rates on mortgage loans 21 percent of the time; African Americans, 13 percent of the time v. 7 percent of the time for all applicants. Stakeholders report that predatory rental and loan practices are on the rise with the tightening of the ownership market.

Recommended actions to address: Improve resident understanding of the attributes of predatory lending, and discourage borrowers from utilizing predatory lending. Publish information regarding predatory style lending on the city website, including how to identify such loans, inclusion of this information in homebuyer education and credit counseling sessions, number of such sessions held and record of participation. Reach out to local bankers and solicit their input on methods to make consumers better aware of the attributes of such loans.

Impediment: Discriminatory terms, conditions, privileges, or facilities relating to rental; refusal to rent as evidenced in housing complaints submitted to HUD and the Metropolitan Fair Housing Council by Oklahoma City residents.

This impediment remains, although complaints have declined as residents have become more fearful of the consequences of filing (e.g., eviction by landlords).

Recommended actions to address: Enhance outreach and education to renters and housing providers.

Impediment: Failure to make reasonable accommodations and neighborhood opposition to group homes, as evidenced in fair housing complaints and reported by stakeholders.

Failure to make reasonable accommodations remain, as evidenced by fair housing complaints and cases. Although NIMBYism against group homes was not found in this AI, the city's zoning code could be modified to better clarify allowance of group homes by zoning district.

Recommended actions to address:

- Conduct audit tests of new market rate construction, and publish the results of such testing
- Conduct outreach and education for providers of multifamily housing
- Encourage developers and builders of housing to attend fair housing training sessions that include reasonable accommodations

Impediment: Lack of understanding of fair housing laws by residents, based on the survey conducted for the AI.

This impediment remains.

Recommended actions to address:

- Engage parties for co-sponsoring events in April during Fair Housing Month
- Conduct educational training sessions for consumers, providers of housing, and program management staff
- Add selection criteria to assisted housing location proposals that give credit to developers and others who have attended fair housing trainings
- Conduct educational training sessions for consumers, providers of housing, and program management staff
- Promote and distribute fair housing flyers

Impediment: Concentration of subsidized and assisted housing in areas with high concentrations of minority residents and households in poverty.

Although public housing is concentrated in some neighborhoods, overall, publicly subsidized housing and particularly Housing Choice Vouchers, are relatively well dispersed citywide.

Recommended actions to address:

- Add selection criteria to assisted housing location proposals that give credit to considering the racial, ethnic, and income characteristics of the neighborhood in which the housing facility is to be placed
- Review planning and zoning ordinances to allow for the greater geographic distribution of such multi-family units or affordable housing units

Impediment: NIMBYism prevents developments of group homes and apartment complexes.

Although NIMBYism against group homes was not found in this AI, the city's zoning code could be modified to better clarify allowance of group homes by zoning district.

Recommended actions to address:

- Consider methods to overcome NIMBYism
- Enhance understanding for affordable housing in alternative locations through outreach and education
- Prepare case studies that highlight the benefits of affordable housing development intermixed with other land uses
- Convene a work group to address which zoning codes represent barriers in some areas, determine which zoning codes those represent, and where, and assess policies or practices to eliminate or modify the codes so that such impacts are lessened or eliminated

Impediment: Lack of adequate public transit in the city, based on stakeholder input.

This impediment remains.

Recommended actions to address:

- Determine which transit routes need to be modified or created
- Solicit input from the affected public on ways to improve the overall transit system
- Solicit input from the transit agency to better understand the institutional reasoning of why some of the suggested options may not be feasible

Impediment. Insufficient fair housing protections in city anti-discrimination law. The statute does not provide for protections from discrimination in the housing market based on disability or familial status. As well, it has not kept pace with State Law, since State Law has protections for age.

No longer an impediment.

Recommended actions to address: City Council pass legislation recognizing disability, familial status, and age as protected classes under Oklahoma City law.

City Progress in Addressing Impediments

Oklahoma City describes its efforts to address barriers annually in its HUD-required Consolidated Annual Performance and Evaluation Report, or CAPER. The city's CAPER is an excellent source of information on efforts to mitigate barriers.

The city partners with the Metropolitan Fair Housing Council (MFHC) to carry out much of its fair housing action plan. The Council has been instrumental in fulfilling many of the 2014 AI fair housing action items, most of which focus on education and outreach. The city has funded the Council to:

- Conduct educational seminars and trainings for first-time homebuyers, public and private housing providers, and faith-based housing providers;
- Monitor and investigate fair housing discrimination complaints; and
- Proceed with legal action when needed, settle complaints, and/or seek damages.

City staff also conduct outreach and education activities, including:

- Hosting housing and legal workshops;
- Using social media to broaden awareness and understanding of fair housing;
- Working with neighborhood groups to provide fair housing education and outreach.

The city has updated its fair housing ordinance to include the protected classes of age, disability, and familial status, in addition to sexual orientation and gender identity.

To address zoning concerns, the city hired a consulting firm to review the city's code. The overhaul of the entire code will continue through 2021 and will include movement to a form-based approach that will allow multifamily housing in more areas of the city, as well as modifications to requirements that raise housing costs.

In September 2017, the city passed a municipal bond that will, in part, add more sidewalks and advance the public transit system. The city's General Obligation Limited Tax Bonds (GOLT) included a \$10 million set aside for affordable housing that will facilitate development of housing near employment, transit, quality schools, and grocery stores for households earning less than 80 percent of the Area Median Income. The joint resolution adopting the allocation limits annual allocations to \$1 million.

Despite these efforts, impediments to housing choice and economic opportunity continue to exist. Decades of exclusionary policies at the federal, state, and local level limited the ability of many racial and ethnic minorities, people with disabilities, women, and non-traditional households from exercising housing choices and building wealth. The effects of these policies are challenging to reverse—yet, as demonstrated by many of the indicators in this AI, and the above discussion, progress is being made within Oklahoma City.

Six priority areas for 2020-2024. The areas where the city should continue to work to break down barriers to housing choice and economic opportunity include:

- **Expand affordable rental housing options** for extremely low income residents who are most vulnerable to discrimination, evictions, displacement, severe cost burden, and homelessness. These residents are disproportionately likely to be racial and ethnic minorities, women/single mothers, persons with disabilities, and persons with mental illness challenges;
- **Improve resident and landlord understanding of fair housing rights** and responsibilities, as well as good tenant and good landlord practices;
- **Narrow the gap in mortgage loan denials and subprime loans** among minority residents, improving low homeownership rates, and combatting predatory lending activity. Work with partners to narrow the gap in mortgage loan denials and subprime loans among minority residents through education and outreach activities that combat predatory lending and expand alternative ownership products (e.g., attached and land trust products).
- **Mitigate displacement** as part of urban renewal and revitalization efforts. Some residents and stakeholders view urban renewal activity as a threat to affordable housing and neighborhoods that have historically housed people of color. The city should be proactive with future urban renewal activities to ensure urban renewal does not result in displacement of low income residents, residents of color, and cultural enclaves;
- **Address gaps in economic opportunity** by lowering concentrated poverty and improving access of African American and Hispanic children to high quality schools; and
- **Improve access to public transit and parks** for underserved areas and residents, including persons with disabilities.

MAPS 4 and fair housing. The recently approved MAPS 4 initiative will be instrumental in addressing barriers. Many MAPS 4 priorities—e.g., developing 500 new ADA-accessible bus shelters—will address some of the barriers identified in this report.

Implementation of MAPS 4 should be viewed through an equity lens and consider the barriers identified in this study. For example, the \$87 million in funds to transform the public transit system should prioritize expanding access to low income households and families and improve the effectiveness of para- and accessible transit. Similarly, investments in sidewalks and placemaking should improve equitable distribution of parks and trails, including accessibility improvements, and yet be mindful of the risk of stimulating market investment that leads to gentrification.

Current Impediments and Fair Housing Action Items

This section details the current impediments to fair housing choice and outlines a recommended set of action items to address the impediments.

Impediment No. 1—Homeownership barriers.

African American, Hispanic, and Native American households find it more difficult to access credit to purchase homes, refinance existing mortgage loans, and/or improve their homes. African American borrowers face high denials even after adjusting for income levels, and Hispanic borrowers are more likely to get high-rate loans. These practices not only have the effect of limiting homeownership opportunities, they also negatively affect housing conditions in certain neighborhoods and perpetuate inequities caused by historic discrimination.

As the city's market has improved, speculative purchases have raised the cost of entry-level ownership housing and property taxes.

Action steps:

- Monitor HMDA data on mortgage loan denials and subprime lending activity including the disproportionate impact on minority borrowers. Fund education and outreach to teach vulnerable residents how to avoid predatory lending, rent to own scams, and high-risk loans.
- Eliminate rezoning requirements for homeownership developments and land trust communities that add affordable products through gentle infill.
- Integrate land trusts into redevelopment activities to mitigate resident displacement and expand affordable homeownership options. While several land trust models exist nationally, the common element is that the land trust retains ownership of the land, thus buying down the cost of homeownership by taking expensive land values out of the equation. The Lowry neighborhood in Denver, a major urban redevelopment/urban infill project, integrated land trust homes into the new neighborhood to expand homeownership across the income spectrum.¹
- Fast track approval of affordable housing developments. Waive, discount, or defer fees for affordable housing, with greater discounts for deeper levels of affordability. Consider exempting affordable units from property taxes.

¹ <https://coloradoctl.org>

- Ensure that city-funded rental and ownership developments built in high opportunity areas exercise affirmative marketing to encourage applications from racial and ethnic minorities living in areas of concentrated poverty.

Impediment No. 2—Discrimination in rental transactions and lack of affordable rental and accessible housing.

The city's shortage of affordable rental options disproportionately affects residents with low incomes who include racial and ethnic minorities, single mothers, residents with disabilities, residents with mental health challenges, and residents with substance abuse challenges. These residents are very vulnerable to being denied housing, being evicted, facing challenges finding housing near quality schools, facing challenges finding accessible and affordable housing, and falling into homelessness—all of which are outcomes that negatively affect the public sector.

Action steps:

- Prioritize city funding to greatly expand the number of affordable housing units with supportive services to serve households who are most vulnerable to discrimination, evictions, and homelessness.
- Fund nonprofit legal representation for renters in the process of eviction to negotiate solutions other than eviction and avoid homelessness. Connect city code enforcement officers with nonprofit legal representation to help negotiate improvements to rental properties without eviction threats.
- Improve the city inspection process for accessibility requirements of the Fair Housing Act to ensure that developers are creating accessible units.
- Consider funding a local program similar to that in Reno, Nevada (administered by Silver State Fair Housing) in which developers are notified of their accessibility requirements at the permitting stage and are regularly inspected during construction.
- Fast track approval of affordable housing developments. Waive, discount, or defer fees for affordable housing, with greater discounts for deeper levels of affordability. Consider exempting affordable units from property taxes.
- Ensure that city-funded rental and ownership developments built in high opportunity areas exercise affirmative marketing to encourage applications from racial and ethnic minorities living in areas of concentrated poverty.

Impediment No. 3—Lack of understanding of fair housing laws and good tenant practices by residents and fair housing compliance by landlords.

Residents are increasingly reluctant to report fair housing violations for fear of losing their housing and facing retaliation. Fair housing complaints and cases processed by the

Metropolitan Fair Housing Council demonstrate a continued need to enhance tenant and landlord fair housing awareness and enforce fair housing laws.

Action steps:

- Continue the commitment to fund the Metropolitan Fair Housing Council to assist residents with fair housing complaints and to conduct fair housing education and training.
- Include fair housing and general housing services on the city's website, including links to the Metropolitan Fair Housing Council's webpage and Legal AidOK. A current search for "fair housing" on the city's homepage returned no fair housing information.
- Ensure that outreach and educational announcements are positioned in newspapers and social media sites that are visited and viewed by vulnerable residents. Continue working with neighborhood groups to raise awareness and transmit fair housing rights information.
- Build public understanding, awareness and support for housing affordability, integration, diversity and inclusion. Recruit a public relations firm to donate or discount time to test messaging to residents and landlords and develop a campaign for execution by the Council and city staff. The city already has an excellent webpage with messaging for some areas ("Snow routes & winter weather tips") and could easily rotate a fair housing campaign through its resident messaging efforts.

Impediment No 4—Zoning code and land use regulations discourage housing type diversity.

As detailed in Section III of this report, there are many areas in the city's zoning code that could be improved to facilitate affordability and more housing type diversity.

Action steps:

- Adopt the recommendations from the zoning review in this AI. Briefly, 1) add flexibility to the definition of family; 2) conduct a legal review on potential fair housing challenges associated with treatment of persons with disabilities living in group homes; and, 3) as part of the code update, consider revising densities and development standards to ensure they accommodate a wide range of housing types and products that are typically more affordable and avoid indirect effects of segregating protected classes into certain neighborhoods.
- As part of continued efforts to update the city's code and add flexibility in residential development consider incorporating the best practices referenced in the zoning review: 1) include a definition of disability consistent with the Federal Fair Housing Act; 2) establish standard processes for reasonable accommodation requests; and 3) allow ADUs and other types of gentle density in some single family districts, potentially in exchange for affordability commitments.

Impediment No. 5—Challenges with affordable and reliable transit access for low income residents and residents with disabilities.

Action steps:

- Assess the results of investments in transit to ensure that they have expanded access in underserved neighborhoods. MAPS 4 should expand transit access to low income households and families and improve the effectiveness of para- and accessible transit.

Impediment No. 6—Limited access to high performing schools for African American and Hispanic students.

Action steps:

- Work with Oklahoma City Public Schools to monitor the results of the P2G transformation on improving access to high performing schools for African American and Hispanic children.
- Continue to invest CDBG public service dollars in afterschool and summer programming and academic activities in low income neighborhoods; increase as resources allow.