

Executive Summary

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

1. Introduction

The City of Oklahoma City (the City) is a federal Entitlement Community under the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant (CDBG) program. In conjunction with CDBG and HOME Investment Partnerships Act (HOME) Programs, the City is required to prepare a Consolidated Plan every five (5) years for submittal to HUD. The purpose of the Consolidated Plan is to provide an updated community-based analysis of current demographics, economic, and public policy trends, and a timely reassessment of the needs of low and moderate income populations relating to housing, shelter, public service, and economic development opportunities. This analysis, along with input received during a comprehensive citizen and stakeholder consultation process, forms the foundation of the City's five (5) year strategic plan for addressing unmet community needs. Each year of the five (5) year strategy, the City is required to prepare an annual Action Plan to inform citizens and HUD of planned activities for the program year. Each Action Plan is due to HUD annually on or before May 15th. The Action Plan serves as the City's application for CDBG and HOME funds. At the end of each fiscal year, the City is required to present to HUD 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 CAPER is due to HUD by October 1st of each year. Regulations governing the CDBG program require that each activity undertaken must meet one of the following three (3) National Objectives:

- Benefit people with low and moderate incomes
- Aid in the prevention or elimination of slums and blight
- Meet an urgent need (such as earthquake, flood, or tornado relief)

The goal of the CDBG program is 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. The HOME program supports the development of affordable housing, expands capacity of affordable housing developers, and leverages private sector investment. The Housing Opportunities for Persons with HIV/AIDS (HOPWA) program is the only Federal program dedicated to addressing the housing needs of persons living with HIV/AIDS and their families. Grantees partner with nonprofit organizations and housing agencies to provide housing and support to these beneficiaries. The Emergency Solutions Grant (ESG) program provides funding to: (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters; (4) provide essential services to shelter residents, (5) rapidly re-house homeless individuals and families, and (6) prevent families and individuals from becoming homeless.

The Consolidated Plan details the City's strategy for meeting National Objectives and HOME program goals, as well as identifying proposed uses for ESG and HOPWA grant funds. Funding provided through HOME, CDBG, ESG, and HOPWA is crucial to the City's ability to meet community needs. The five (5) year Consolidated Plan prioritizes housing as a primary objective, specifically within the Neighborhood Revitalization Strategy Area (NRSA) and the Strong Neighborhoods Initiative (SNI) neighborhoods where 80% of available grant resources are targeted. Each Annual Action Plan Year, funding recommendations are reviewed and vetted according to the goals and objectives of the Consolidated Plan.

2. Summarize the objectives and outcomes identified in the Plan

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

Second program year allocations are based on the most recent projections available at the time of reporting. CDBG and HOME allocations in future years are projected to remain steady with no significant cuts anticipated. The estimated HOME funding for future years is projected at 90% of the first year estimate. ESG and HOPWA funding are projected to remain steady. In the Second Action Plan Year, The City of Oklahoma City recognized a minimal increase in CDBG and HOPWA funding and a 5% increase in HOME funding. ESG funding was relatively unchanged.

In 2015, the City was successful in an application for Section 108 funding to support a new 21C Museum Hotel in the historic Film Row District. Section 108 Loan Guarantee capacity will be utilized Annual Action Plan during the First and Second Action Year Plans to support the development which includes a 138 room boutique hotel, restaurant and museum. The 21C site is located within the Oklahoma City Round III Empowerment Zone as designated by HUD (Census tract 1030.000). If additional opportunities materialize in the FY 2016-17 Action Plan year, Section 108 Loan Guarantee applications may be submitted to further the City's ongoing economic development initiatives. The City continues to concentrate resources strategically within the SNI neighborhoods to promote a holistic approach to neighborhood revitalization, rather than funding isolated stand-alone activities throughout the metropolitan area with nominal impact. Reductions in formula grant funds in recent years have increased the need for local subsidy and private investment to meet the needs of the community.

In the 2016-17 Second Action Plan Year, the City of Oklahoma City has continued to place emphasis on affordable housing, with specific emphasis on the Neighborhood Revitalization Strategy Area (NRSA). HOME funding has been allocated for down payment assistance to low income homebuyers, whole house rehabilitation, non-profit housing construction, and owner-occupied rehabs within the SNI neighborhoods. Public service activities continue to be a priority of the community, and funding has been allocated for free and reduced bus and taxi fares for special populations, graffiti removal, securing abandoned houses, after school programming, hazardous tree removal, legal assistance, and public education. CDBG unding for public facilities has been allocated to support rehabilitation of a child advocacy center for abused children, two (2) community parks, and sidewalks and tree planting efforts within the SNI neighborhoods. Additional funding for public facilities and infrastructure remains in contingency while new applications are being vetted and reviewed by Staff.

The City of Oklahoma City continues to support economic development activities using CDBG funding. Funded activities include small business training, staff support for the Urban Renewal Authority, Section 108 loan fund, and an economic development revolving loan fund to support businesses within approved commercial district revitalization areas. ESG funding continues to support a myriad of activities to address chronic homelessness, and HOPWA funds have been allocated to provide Tenant Based Rental Assistance (TBRA) and Short Term Rental, Mortgage, and Utilities assistance to persons with HIV/AIDS.

3. Evaluation of past performance

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

The 2015-20 Five (5) Year Consolidated Plan includes strategies, with a particular focus on low and moderate income individuals and families, to provide safe, decent and affordable housing; to end homelessness by moving individuals and families from homelessness to permanent housing; to provide a safe and suitable living environment with adequate public facilities and services to ensure a high quality of life; and, to expand economic opportunities by providing financial resources and technical assistance to businesses in creating jobs and providing retail and commercial services with particular focus in the Neighborhood Revitalization Strategy Area (NRSA) and SNI neighborhoods.

Annual Action Plan

In the First Action Plan Year, the City of Oklahoma City has been successful in attaining the goals and objectives contained in the 2015-20 Consolidated Plan and 2015-16 First Action Plan Year strategies. The activities undertaken addressed the overall program goals of the formula grant programs and include providing decent housing and suitable living environment, and expanding economic opportunities principally for persons of low and moderate income.

The Consolidated Plan addressed **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 ; support for down payment and closing cost assistance to expand homeownership opportunities; funding for activities that support the City's housing rehab program, and housing and services for persons with HIV/AIDS. Activities undertaken in the 2015-16 First Action Plan Year have addressed each of these goals and are on target to meet projected outcomes by fiscal year end on June 30, 2016.

The goal of providing a **suitable living environment** was addressed in the Consolidated Plan and First Action Year Plan strategies by continuing ongoing programs that address specific community needs. The 2015-16 First Action Plan 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; 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, making tax incentives available in the City's Empowerment Zone, and investing Section 108 Loan Guarantee funds in businesses to create jobs for low and moderate income persons.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The principal goal of the Citizen Participation Plan is to provide for and encourage citizen participation, with particular emphasis on persons of low/moderate income who reside in slum/blighted areas; areas in which funds are proposed for use; and low/moderate income neighborhoods as defined by the City. Objectives are:

1. To provide citizens with reasonable and timely access to local meetings, information, and records relating to the City's proposed use of Federal grant program funds administered by the City, as required by the Secretary of HUD, and relating to the actual use of funds under the HCDA, etc., as amended;

2. To provide technical assistance to groups representing persons of low/moderate income in developing proposals for applicable funding opportunities;

3. To provide for public meetings and public hearings to obtain citizen views and to respond to proposals/questions at all stages of the community development process. This includes the identification of needs, development and review of proposed activities, and evaluation of program performance. Hearings are held after adequate notice, at times and locations convenient to potential or actual beneficiaries, and with accommodation for minorities and non-English speaking persons, as well as persons with mobility, visual or hearing impairments in all stages of the process;

4. To encourage participation of residents of public and assisted housing developments, and residents of targeted revitalization areas;

5. To consult with, and provide information to housing agencies about Consolidated Plan activities that may relate to developments and surrounding communities within their jurisdiction for use in formulating their required housing agency plans;

6. To provide written responses to formal complaints and grievances, within fifteen (15) working days where practicable, and;

7. To publish a synopsis of the draft Consolidated Plan, and provide citizens the opportunity to inspect the full draft document on the City's website or at the City of Oklahoma City Planning Department, Community Development Division-420 W. Main Street, Suite 920, Oklahoma City, OK within a thirty (30) day comment period prior to the final public hearing and adoption of the Consolidated Plan. A record of public comments received will be maintained and will be submitted with the Consolidated Plan indicating responses to all comments;

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

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

5. Summary of public comments

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

The public participation process for the completion of the 2016-2017 Second Action Plan Year began in December 2015 with the publication of a Notice of Public Meetings for two (2) community input sessions held at Sunbeam Family Services facility on January 7, 2016 at 2:00 p.m., and January 12, 2014 at 6:00 p.m. Meetings were held at varying times, with one meeting held during the afternoon to accommodate persons working evening hours. A total of forty (40) citizens and representatives of local organizations and service providers attended these meetings. Eight (8) Staff members were present at each meeting. Citizen input touched on many different topics which are itemized in the attached appendix. The most common were requests for additional public services support, the need for new and repaired sidewalks, affordable housing, more bicycle lanes, continued support for the Strong Neighborhoods Inititaive (SNI) program, and the need for additional resources to assist domestic violence victims and homeless youth.

Additional opportunities for community input were provided at the Citizens Committee for Community Development meetings on January 19, 2016 and February 16, 2016. Final recommendations were presented by Staff to the Neighborhood Conservation Committee (NCC) of City Council on March 1, 2016. A thirty (30) day Notice seeking public comment on the proposed Second Year Action Plan was published in *The Oklahoman* on March 12, 2016. A final opportunity for input was provided in a public hearing before City Council on April 26, 2016 at the time of Plan approval.

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

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

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

Feedback received from the public was overwhelmingly in favor of providing additional support for public service activities. Although the need is great, the CDBG 15% public services cap provides minimal opportunity to increase support to these types of activities. In addition, subrecpients must demonstrate both financial and organizational capacity to ensure non-dependence on federal funds in a time of declining resources. Although the City of Oklahoma City is sensitive to the need for additional public services support, we were unable to support new activities in the Second Action Plan Year. We did, however, maintain support for activities supported in prior years. These include the provision of vouchers to the homeless and disabled for bus and taxi fares, graffiti removal, and securing abandoned housing.

All public feedback was given due consideration, although not every requested activity could be funded. Some comments were in direct opposition with one another, requiring either substantial compromise between two worthy alternatives, or rejection of a viewpoint not in conformance with the larger majority. Other suggestions were non-compliant with program regulations and strategic goals. For example, multiple comments were received about the need for investment in neighborhoods other than NRSA and SNI target areas; however, the City has committed 80% of available resources to those neighborhoods with support from the City Council to ensure a holistic and sustainable approach to revitalization. The need for greater community investment is apparent; however, resources (both monetarily and administratively) are insufficient to enlarge the targeted neighborhood boundaries at the present time.

7. Summary

Oklahoma City's strategic mission for community development is to provide for ongoing community revitalization by leveraging Federal and local resources with private investment and non-federal sources to ensure the provision of decent housing, suitable living environment and expanded economic opportunity for all residents of the community. In addition to the City's formula grant activities, local efforts have been undertaken to ensure economic momentum. The citizens of Oklahoma City passed a third Metropolitan Area Projects (MAPS) tax referendum estimated at \$777 million which was implemented in April 2010 and continues through April 2017. This third initiative provides for a new convention center, a downtown regional (Core to Shore) park, a 4.5 mile rail based streetcar system, a new exposition center at the state fairgrounds, and creation of a community trails network. It is anticipated that most, if not all, of these projects will be completed during the 2015-2020 time frame covered by this Consolidated Plan. Projects at the State Fair Grounds and the Boathouse District are expected to be completed during the Second Action Plan Year. Substantial private investment is also planned and underway throughout the City. .

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 Second Year Action Plan.

During the 2015-16 First Action Plan Year, the falling prices of commodities, specifically the price of crude, has adversely affected local growth due to the City's disproportionate reliance on the energy industry. Rapidly declining oil prices have led to substantial corporate layoffs among some of the City's largest employers, and a significant decrease in sales tax revenues which has impacted the area at both the state and local levels. Although development continues throughout the City, albeit at a slower pace, multiple large-scale project proposals have been either terminated, scaled back, or postponed indefinitely. Single family foreclosures are trending upward.

In 2015, a total of 2,472 apartment rental units were added in Oklahoma City, an increase of 122% over 2014. In the Second Action Plan year, completion of 3,391 new apartment rental units now under construction in the Oklahoma city MSA is expected to test the current market demand. An additional 2,525 units are in the late planning stages. Occupancy rates are currently averaging 91%. In the Urban Core, seven hundred (700) units will come online during 2016 which represents a 70% increase since 2012. To date, concessions have not been needed for lease-up; however, the anticipated increase in inventory is expected to test the market in the coming year. The rental housing market will be closely monitored in the coming year, and funding priorities will be revised as needed to address changes in the market.

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 the Consolidated Plan is defined as an amendment that adds a new sub-grantee, transfers funds from one activity to another involving 30% or more of the funds, or cancels an activity.

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

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

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

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

Table 1 – Responsible Agencies

Narrative (optional)

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

Consolidated Plan Public Contact Information

AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

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

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

The City routinely communicates with the Oklahoma City Housing Authority (OCHA) to understand their programs and needs. The City continues to provide them with funding each year to rehabilitate some of their 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 will also be planting trees on several OCHA properties within the SNI as part of our neighborhood tree planting initiative. Early discussions have been held with OCHA to consider the possibility of making joint application for a future Choice Neighborhood Grant.

The City interacts routinely with the Oklahoma Housing Finance Authority (OHFA) as we direct clients to Section 8 programs, coordinate data sharing, and process Resolutions of Local Support for Low Income Housing Tax Credit (LIHTC) applicants proposing to build affordable housing in the City limits. In the past the City has provided some additional funding in support of selected LIHTC projects.

The City actively interacts on an on-going basis with our Continuum of Care (CoC) subrecipients, including a number of mental and private service agencies that provide various types of assisted housing. Several homeless service providers within 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 Committee, Community Development Division staff participates in the Coalition to End Poverty, and the Governor's Interagency Council on Homelessness which serves as a forum for communication with representatives from state agencies, community organizations, and non-profits.

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

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

While the City has permanent housing programs that focus on homeless families, the most extensive services to that population have been provided via the Emergency Solutions Grant though prevention and re-housing assistance. The services that ESG provides are the ones most often required by homeless families as few have the extensive needs that make supportive housing a necessity. ESG funds are typically the vehicle used to address the needs of those at risk of homelessness. If an individual or family demonstrates that they are at imminent risk of being homeless, ESG agencies can help address the issues leading to that situation and provide case management to avoid it.

The OKC CoC has an increasing focus on homeless youth. Be The Change, the City's primary outreach provider has, with an ESG grant, operated a youth outreach program for the last two years, and the Department of Human Services is working towards becoming a Road to Independence grantee. These organizations together formed the Homeless Youth Alliance, a group of local non-profit and government organizations focused on addressing the needs of homeless youth. Since that time, Be The Change opened the City's first youth drop-in center and is seeking funding for several others, plus a youth shelter.

Planning for the homeless strategies and outcomes starts 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 provides insight and feedback on the Plan objectives to meet the needs of people who are homeless and have special needs including people with HIV/AIDS. The Coalition updates the City's 10-Year Plan to End Homelessness and works to provide awareness to elected officials, interested parties and the public about homelessness and people who have special needs.

In collaboration with the City of Oklahoma City Planning staff and the Homeless Alliance, the Coalition organizes and executes the annual Point in Time Count (PIT) of the Homeless each January. This

information is used in the annual HUD Continuum of Care (CoC) competition. The information obtained from the annual count is used to calculate need and track trends that occur in the homeless population 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 for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

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

The geographic area served by ESG is the same as the Oklahoma City Continuum of Care (CoC) and ESG funded agencies are considered to be members of the CoC. All ESG and CoC funded organizations are members of the Coalition to End Poverty and several CoC subrecipients also receive ESG funding and conduct ESG eligible activities. As the CoC lead agency, the City of Oklahoma City Planning Department consults with ESG funded agencies to develop performance standards that serve as a measure for evaluating the outcomes of ESG assisted projects. The lead agency also collaborates with CoC and ESG funded agencies to develop local policies related to other ESG elements such as case management. The CoC Board ranks/determines funding allocations and monitors financial and programmatic elements of both CoC and ESG funded projects. The CoC board provides feedback on strengths and weaknesses 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 subrecepient 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, as well as several other funding sources. Recently, the CoC switched from a self developed HMIS system to Servicepoint which allowed a cost savings of \$77,000 which is being utilized to create a new permanent supportive housing project for chronically homeless individuals.

The Oklahoma City Emergency Medical Services Authority (EMSA) hired a HOPWA consultant (Center for Urban Community Services) in 2007 to conduct an area-wide Needs Assessment. The Assessment was completed in 2008 and provides the basis for CoC funding decisions. The study remains relevant in 2016 and has been instrumental in developing an overall strategy to direct funding to those individuals

and families with the greatest need. The Continuum of Care lead agency meets with the Oklahoma AIDS Care Fund and the HIV Networking Group monthly to determine progress and develop strategies for addressing the underserved needs of persons and families with HIV/AIDS.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Metropolitan Fair Housing Council
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Administration-Fair Housing Enforcement
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City contracts with Metropolitan Fair Housing Council to conduct fair housing activities and investigate housing discrimination complaints. The Metro Fair Housing Council provides periodic reporting on their activities, which is used to tailor strategies for promoting Fair Housing. Metro Fair Housing's Fair Housing complaints data and organizational input were essential to the completion of the 2014 Analysis of Impediments.
2	Agency/Group/Organization	OKLAHOMA CITY HOUSING AUTHORITY
	Agency/Group/Organization Type	РНА
	What section of the Plan was addressed by Consultation?	Public Housing Needs Homelessness Needs - Veterans Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	In preparation of the 2015-20 Consolidated Plan, the Oklahoma City Housing Authority was consulted directly by City Staff to gauge current needs for public housing and Section 8 tenants. Information was provided by OCHA about current inventories, waiting lists, capital needs, veterans' benefits, anticipated funding over the next five (5) years, and anticipated gaps in resources. The City of Oklahoma City continues to provide CDBG funding to support the rehabilitation of fifteen (15) public housing units in the Second Action Plan Year to enhance the quality of public housing.

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

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

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

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
		The Continuum of Care Committee generally adheres to recommendations and priorities identified
Continuum of Care	The City of	in the Consolidated Plan, and seeks to ensure a targeted distribution of resources based on need.
Continuum of Care	Oklahoma City	In the Second Action Plan Year, CoC, HOPWA, ESG and City Social services funding was allocated
		with oversight by the CoC Committee.
	The City of	In the Second Action Plan Year, The City of Oklahoma City adopted a new comprehensive plan
PlanOKC	The City of	(PlanOKC) that will inform all City planning strategies for the foreseeable future. It is anticipated to
	Oklahoma City	impact all funding priorities in the final three (3) years of this Consolidated Plan.
	Association of	The CEDS is a long range regional plan that analyzes the challenges and opportunities related to
Comprehensive ED		economic and community development in the Central Oklahoma region. The City of Oklahoma City
Strategy Central OK	Central Ok	continues to collaborate with ACOG to achieve economic development objectives and enhance the
	Governments	regional appeal of the metropolitan area to attract new business and industry.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

The City of Oklahoma City maintains an ongoing dialogue with local non-profit and for-profit housing providers and developers to gauge housing needs within 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 conversations and discourse with the Oklahoma City Housing Authority.

Two (2) public meetings were held in January 2016 at the Sunbeam Family Services facility at NW 14th and Classen. Attendance at these meetings by local service providers and neighborhood associations included representatives from Community Action Agency, Classen Ten-Penn Neighborhood Association, Central Ok Transportation and Parking Authority, Neighborhood Services Organization, Mustard Seed Development, Its My Community, Oklahoma City Afterschool Network, YWCA, Neighborhood Alliance, Sunbeam Family Services, Jefferson Park Neighborhood Association, OKQLP, Positive Tomorrows, Center for Economic Development, OK Voices of Victory, Positively Paseo, Be The Change, Neighborhood Housing Services, Arts Council of OKC, Oklahoma AIDS Care Fund, The Alliance for Economic Development, Oklahoma Commision on Children and Youth, and the State of Oklahoma Department of Human Services. Comments and input received during these public meetings are provided in the appendices of this report.

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

Collaborative efforts to promote economic growth are sometimes more difficult to achieve due to the competition for sales tax dollars between local communities. The funding of city services relies heavily on continued increases in sales tax receipts and the City of Oklahoma City often finds itself in direct competition with suburban municipalities for new businesses. In the Second Action Plan Year, a significant decrease in sales tax revenue state wide has only served to exacerbate the problem.

AP-12 Participation – 91.105, 91.200(c)

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

A Notice of Public Meetings was published in *The Oklahoman* on December 23, 2015 soliciting participation and feedback for the 2015-20 Consolidated Plan 2016-17 Second Action Year Plan. In addition, local stakeholders, non-profit organizations and other interested parties were notified of the public meetings via email on January 4, 2016. Meetings were held at the Sunbeam Family Services facilities at NW 14th and Classen at 2:00 p.m. on January 7, 2016 and at 6:00 p.m.. on January 12, 2016.

The citizen participation process and summary of feedback has been fully described in 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 Second Action Year Plan. Where possible, funding allocations and strategic goals were identified based upon the most urgent community needs. Staff will evaluate needs on an ongoing basis. Funding allocations in each Annual Action Plan will be adjusted as needed to promote a strategic and targeted allocation of resources, with the intent of creating a noticeable and sustainable community benefit.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of	Summary of	Summary of comments	URL (If
			response/attendance	comments received	not accepted	applicable)
					and reasons	
		Non-	Two (2) public meetings were held for public comment and feedback. The first on January 7, 2016 was scheduled at 2:00 p.m. to accommodate citizens working evening hours, and to provide an alternative time for	A summary of	All comments and	
1	Public Meeting	targeted/broad community Non-Profit Organizations and Service Providers	representatives from local non-profits and service providers during normal business hours. The January 7th meeting was well attended with thirty- six (36) community members present. The evening meeting on January 12th was attended by twenty (20) community members. Eight (8) City Community Development Staff members were present at each meeting.	community feedback is attached in the appendices of this report.	suggestions were given due consideration in the allocation process, although not all requests could be supported.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of	Summary of	Summary of comments	URL (If
			response/attendance	comments received	not accepted	applicable)
2	Newspaper Ad	Non- targeted/broad community	A Combined Notice of Thirty (30) Day Comment Period and Notice of Public Hearing was submitted to Oklahoma Publishing Company (OPUBCO) for publication on March 16, 2016 and printed on March 25th in the legal notices.	No additional comments were received in response to the published request for public comment about proposed activities.	Not Applicable	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
			In addition to the two			
			(2) public meetings			
			conducted for citizen			
			input, the proposed			
			Second Action year			
			Plan was also			
			presented at public			
			meetings of the			
			Citizens Committee			
			for Community			
			Development on			
			January 19, 2016 and	No additional		
		Non-	February 16, 2016.	feedback from the		
3	Public Hearing	targeted/broad	The Second Action	public was received	Not Applicable	
		community	Year Plan as	during the public		
			approved by the	hearings.		
			CCCD was presented			
			at a public meeting of			
			the Neighborhood			
			Conservation			
			Committee of City			
			Council on March 1,			
			2016. A final public			
			hearing before City			
			Council was			
			conducted on April			
			26, 2016.			
			Annual Action Pla	an	21	

Annual Action Plan 2016 Table 4 – Citizen Participation Outreach

Annual Action Plan 2016

Expected Resources

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

Introduction

Second program year allocations are based upon the most recent projections available at the time of report submission. The CDBG allocation remained relatively steady for the Second Action Plan Year, with an estimated 1.0% increase over last year. HOME funds for the Second Action Year Plan increased by 6.8%; however, the overall funding trend remains in decline with resources declining by 35.3% since 2011. The estimated HOME funding for future years is projected at 90% of the first year estimate, which may be somewhat optimistic. ESG and HOPWA funding are expected to remain steady.

In addition to the direct allocation of CDBG entitlement funds, The City was awarded from the Oklahoma Department of Commerce \$33.5 million CDBG-DR funding for disaster recovery unmet needs in the First Action Year Plan.

HUD released an interim rule for a National Housing Trust Fund (HTF) on January 30, 2015. These funds are presently administered by the State under a structure similar to Low Income Housing Tax Credits (LIHTC). Due to similarities with the HOME program, political discussion at the time of reporting suggests that this program may soon replace the HOME program due to the similarities in structure and intent. It is unknown at the present time if the City of Oklahoma 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 of Oklahoma City was approved for Section 108 funding during the First Action Year Plan to fund a new 21C Museum Hotel in the historic Film Row District, and anticipates the use of its Section 108 Loan Guarantee capacity during this Second Action Year Plan to support the development of a 135 room boutique hotel, restaurant and museum. The 21C site is located within the Oklahoma City Round III Empowerment Zone as designated by HUD (Census tract 1030.000). If additional opportunities materialize in the FY 2016-17 Second Action Plan year, Section 108 Loan Guarantee applications may be submitted to further the City's ongoing economic development initiatives.

Priority Table

Program	Source	Uses of Funds	Expe	cted Amour	nt Available Y	ear 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Reminder of ConPlan \$	
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	4,365,726	171,027	151,693	4,688,446	12,918,758	Prior year resources include 2015 unprogrammed funds, and recaptured program funds. Future allocations assume flat funding over the five (5) year life of the Plan.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,785,041	122,000	52,111	1,959,152	4,233,633	Prior year resources include unallocated 2015-16 program funds, and recaptured program funds. Future allocations assume a minimum 10% cut in funding over the five (5) year plan period.

Program	Source	Uses of Funds	Expe	cted Amour	nt Available Ye	ear 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Reminder of ConPlan \$	
HOPWA	public -	Permanent						Future allocations assume flat funding
	federal	housing in						from year to year.
		facilities						
		Permanent						
		housing						
		placement						
		Short term or						
		transitional						
		housing facilities						
		STRMU						
		Supportive						
		services						
		TBRA	544,334	0	0	544,334	1,579,474	

Program	Source	Uses of Funds	Expe	cted Amour	nt Available Ye	ear 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Reminder of ConPlan \$	
ESG	public -	Conversion and						Future allocations assume flat funding
	federal	rehab for						from year to year.
		transitional						
		housing						
		Financial						
		Assistance						
		Overnight shelter						
		Rapid re-housing						
		(rental assistance)						
		Rental Assistance						
		Services						
		Transitional						
		housing	388,987	0	0	388,987	1,169,577	

Table 5 - Expected Resources – Priority Table

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

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

The City has a CHDO set-aside that includes the 15% CHDO statutory minimum and a pool of HOME funds loaned to Community Housing Development Organizations for new home construction and rehabilitation/sale activities. CHDOs are encouraged to utilize private bank financing along with the CHDO loan pool of HOME funds in providing affordable housing. Proposals for new projects are 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. The primary lot recipients include CHDO's and Habitat for Humanity. The new home construction is typically funded with private financing and other resources. When resources allow, the City also provides local funding (general funds) to agencies that provide services to the homeless.

Federal funds provided by HUD are utilized in several ways to leverage public and private resources. The City's down payment and closing cost assistance program assists in the achievement of home ownership, and has proven to be an attractive program that stimulates significant interest among private lenders. During the 2014-2015 reporting period, the City leveraged its Down Payment Assistance program funds with private financial institution mortgage investments totaling \$TBD. 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 most funding cycles, provides bonus points for applications that receive a minimum level of funding granted to the project from the local community. LIHTC credits provide significant leverage in affordable housing developments.

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

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

The City owns thirty-six (36) residential lots on the north side of Northwest 10th Street between Ellison Avenue to the east, and Blackwelder Avenue to the west. These lots were offered in a Request for Proposals (RFP) released on March 25, 2015 to solicit project proposals for residential, commercial and/or mixed-use development on these sites. The City is currently in negotiations with a local builder to develop a mixed income housing and retail development on these lots. It is anticipated that redevelopment of these parcels will occur within the five (5) year Consolidated Plan period. Construction is anticipated to begin during the Second Action Year Plan.

Discussion

Regarding required 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 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. The City of Oklahoma City continues to prioritize funding of projects that leverage private capital and non-federal funding. It is anticipated that sufficient match will be generated from funded activities to fulfill the match requirement without the use of banked credit.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Whole-House	2015	2020	Affordable	NEIGHBORHOOD	Quality of	HOME:	Homeowner Housing
Rehabilitation-HOME			Housing	STRATEGY AREA	Affordable Owner	\$2,723,674	Rehabilitated: 30 Household
				Strong	Housing		Housing Unit
				Neighborhoods			
				Initiative			
Exterior Maintenance	2015	2020	Affordable	NEIGHBORHOOD	Quality of	CDBG:	Homeowner Housing
and Storm Shelters-			Housing	STRATEGY AREA	Affordable Owner	\$1,234,000	Rehabilitated: 35 Household
CDBG				Strong	Housing		Housing Unit
				Neighborhoods			Other: 15 Other
				Initiative			
Emergency Repairs-	2015	2020	Affordable	NEIGHBORHOOD	Quality of	CDBG:	Homeowner Housing
CDBG			Housing	STRATEGY AREA	Affordable Owner	\$587,242	Rehabilitated: 100
				Strong	Housing		Household Housing Unit
				Neighborhoods			
				Initiative			
Downpayment and	2015	2020	Affordable	NEIGHBORHOOD	Affordability of	HOME:	Homeowner Housing Added:
Closing Costs			Housing	STRATEGY AREA	Owner-Occupied	\$700,000	60 Household Housing Unit
Assistance-HOME				Strong	Housing		
				Neighborhoods			
				Initiative			
	Whole-House Rehabilitation-HOME Exterior Maintenance and Storm Shelters- CDBG Emergency Repairs- CDBG Downpayment and Closing Costs	YearWhole-House Rehabilitation-HOME2015Rehabilitation-HOME2015Exterior Maintenance and Storm Shelters- CDBG2015Emergency Repairs- CDBG2015Emergency Repairs- CDBG2015Downpayment and Closing Costs2015	YearYearWhole-House Rehabilitation-HOME20152020Rehabilitation-HOME20152020Exterior Maintenance and Storm Shelters- CDBG20152020Emergency Repairs- CDBG20152020Emergency Repairs- CDBG20152020Downpayment and Closing Costs20152020	YearYearWhole-House Rehabilitation-HOME20152020Affordable HousingExterior Maintenance and Storm Shelters- CDBG20152020Affordable HousingEmergency Repairs- CDBG20152020Affordable HousingEmergency Repairs- CDBG20152020Affordable HousingDownpayment and Closing Costs20152020Affordable Housing	YearYearYearWhole-House20152020AffordableNEIGHBORHOODRehabilitation-HOME20152020HousingSTRATEGY AREARehabilitation-HOMEIIINeighborhoodsRehabilitation-HOMEIIINeighborhoodsRehabilitation-HOMEIIINeighborhoodsRehabilitation-HOME20152020AffordableNEIGHBORHOODAnd Storm Shelters-20152020AffordableNEIGHBORHOODCDBGIIIINeighborhoodsCDBG20152020AffordableNEIGHBORHOODCDBGIIIIIDownpayment and20152020AffordableNEIGHBORHOODClosing CostsAssistance-HOMEIIIIAssistance-HOMEIIIIIWhole-HOMEIIIIIINeighborhoodsIIIIIINeighborhoodsIIIIIINeighborhoodsIIIIIINeighborhoodsIIIIIINeighborhoodsIIIIIIINeighborhoodsIIIIIIINeighborhoodsIIIIIIINeighborhoodsII <td>YearYearYearYearYearWhole-House20152020AffordableNEIGHBORHOODQuality ofRehabilitation-HOMEIIIIStrartEGY AREAAffordable OwnerRehabilitation-HOMEIIIIStrongHousingRehabilitation-HOMEIIIIIIRehabilitation-HOMEIIIIIIRehabilitation-HOMEIIIIIIRehabilitation-HOME20152020AffordableNEIGHBORHOODQuality ofReterior Maintenance20152020AffordableNEIGHBORHOODAffordable OwnerCDBGIIIIIIIEmergency Repairs-20152020AffordableNEIGHBORHOODQuality ofCDBGIIIIIIIDownpayment 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InitiativeAffordability of Owner-Occupied HousingHOME: \$5700,000</td></td>	YearYearYearYearYearWhole-House20152020AffordableNEIGHBORHOODQuality ofRehabilitation-HOMEIIIIStrartEGY AREAAffordable OwnerRehabilitation-HOMEIIIIStrongHousingRehabilitation-HOMEIIIIIIRehabilitation-HOMEIIIIIIRehabilitation-HOMEIIIIIIRehabilitation-HOME20152020AffordableNEIGHBORHOODQuality ofReterior Maintenance20152020AffordableNEIGHBORHOODAffordable OwnerCDBGIIIIIIIEmergency Repairs-20152020AffordableNEIGHBORHOODQuality ofCDBGIIIIIIIDownpayment and20152020AffordableNEIGHBORHOODQuality ofClosing CostsAssistance-HOME20152020AffordableNEIGHBORHOODAffordability ofNeighborhoodsIIIIIIIIDownpayment and2015IIIIIIResistance-HOMEIIIIIIIINeighborhoodsIIIIIIIIResistance-HOMEIIII </td <td>YearYearYearYearYearYearWhole-House Rehabilitation-HOME20152020Affordable HousingNEIGHBORHOOD STRATEGY AREA InitiativeQuality of Affordable Owner HousingHOME: \$2,723,674Exterior Maintenance and Storm Shelters- CDBG20152020Affordable 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Neighborhoods InitiativeQuality of HousingCDBG: \$1,234,000Downpayment and Closing Costs Assistance-HOME20152020Affordable HousingNEIGHBORHOOD Strong Neighborhoods InitiativeAffordability of HousingCDBG: \$587,242Downpayment and Closing Costs Assistance-HOME20152020Affordable HousingNEIGHBORHODD Strong Neighborhoods InitiativeAffordability of Owner-Occupied HousingHOME: \$5700,000

Annual Action Plan 2016

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	CHDO New	2015	2020	Affordable	NEIGHBORHOOD	Supply of	HOME:	Homeowner Housing Added:
	Construction/Rehab-			Housing	STRATEGY AREA	Affordable	\$1,155,011	8 Household Housing Unit
	HOME					Owner-Occupied		
						Housing		
6	Multi-Family Rehab-	2015	2020	Affordable	NEIGHBORHOOD	Quality of	CDBG:	
	CDBG			Housing	STRATEGY AREA	Affordable Owner	\$982 <i>,</i> 445	
						Housing		
7	Rehabilitation of Public	2015	2020	Public Housing		Quality of Public	CDBG:	Rental units rehabilitated: 15
	Housing Units- CDBG					Housing	\$234,897	Household Housing Unit
8	Affordable Housing-	2015	2020	Affordable	NEIGHBORHOOD	Supply of	CDBG:	Homeowner Housing Added:
	AHDP and RHP- CDBG			Housing	STRATEGY AREA	Affordable	\$84,259	4 Household Housing Unit
	and HOME					Housing - AHDP		
						and RHP		
9	Public Facilities, Srvcs,	2015	2020	Non-Housing	NEIGHBORHOOD	Quality of	CDBG:	Public service activities other
	Infrastructure-SNI			Community	STRATEGY AREA	Affordable Owner	\$1,569,718	than Low/Moderate Income
	CDBG			Development	Strong	Housing		Housing Benefit: 815 Persons
					Neighborhoods	Public Facilities,		Assisted
					Initiative	Services and		Other: 10 Other
						Infrastructure		
						Strengthen		
						Neighborhood		
						Capacity		

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
10	Neighborhood	2015	2020	Non-Housing	NEIGHBORHOOD	Strengthen	CDBG:	Public Facility or
	Capacity- CDBG			Community	STRATEGY AREA	Neighborhood	\$50,000	Infrastructure Activities other
				Development	Strong	Capacity		than Low/Moderate Income
					Neighborhoods			Housing Benefit: MidTown
					Initiative			Kiosks installation. An
								Estimated 4000 Persons to
								benefit.
11	Special Needs	2015	2020	Non-Housing		Transportation	CDBG:	Public service activities other
	Transportation			Community		Options -Special	\$102,842	than Low/Moderate Income
	Services-CDBG			Development		Needs Population		Housing Benefit: 2700
								Persons Assisted
12	Graffiti Removal-CDBG	2015	2020	Non-Housing		Public Services-	CDBG:	Public Facility or
				Community		Graffiti Removal	\$15,011	Infrastructure Activities other
				Development				than Low/Moderate Income
								Housing Benefit: 400 Persons
								Assisted
13	Secure Vacant and	2015	2020	Non-Housing		Address Slum and	CDBG:	Public Facility or
	Abandoned Properties-			Community		Blight- Vacant	\$68,562	Infrastructure Activities for
	CDBG			Development		Abandoned Bldgs		Low/Moderate Income
								Housing Benefit: 125
								Households Assisted
14	Small Business	2015	2020	Non-Housing		Economic	CDBG:	Businesses assisted: 90
	Technical Assistance-			Community		Opportunities for	\$39,149	Businesses Assisted
	CDBG			Development		Low and		
						Moderate Income		

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
15	Small Business	2015	2020	Non-Housing		Economic	CDBG:	Businesses assisted: 4
	Revolving Loan Fund-			Community		Opportunities for	\$750,000	Businesses Assisted
	CDBG			Development		Low and		
						Moderate Income		
16	Section 108 Loan	2015	2020	Non-Housing	NEIGHBORHOOD	Economic	CDBG:	Jobs created/retained: 71
	Assistance- CDBG			Community	STRATEGY AREA	Opportunities for	\$350,000	Jobs
				Development		Low and		
						Moderate Income		
17	Empowerment Zone	2015	2020	Non-Housing		Economic	CDBG: \$1	Other: 1 Other
	Staffing- CDBG			Community		Opportunities for		
				Development		Low and		
						Moderate Income		
18	STRMU for Persons	2015	2020	Non-Homeless		Housing	HOPWA:	Housing for People with
	with HIV/AIDS- HOPWA			Special Needs		Availability-	\$272,167	HIV/AIDS added: 70
						Persons With		Household Housing Unit
						HIV/AIDS		
19	TBRA for Persons with	2015	2020	Non-Homeless			HOPWA:	Housing for People with
	HIV/AIDS- HOPWA			Special Needs			\$272,167	HIV/AIDS added: 30
								Household Housing Unit

Sort	Goal Name	Start	End	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year					
20	Housing for the	2015	2020	Homeless		Supportive	ESG:	Tenant-based rental
	Chronically Homeless-					Housing for the	\$388,987	assistance / Rapid Rehousing:
	ESG					Chronically		110 Households Assisted
						Homeless		Homeless Person Overnight
						Services for		Shelter: 600 Persons Assisted
						Homeless Youth		Homelessness Prevention: 70
						(Age 21 and		Persons Assisted
						under)		Other: 1640 Other
						Sustainability of		
						Transitional		
						Housing		
						Homeless		
						Households with		
						Children		
21	Administration	2015	2020	Administration		Administration	CDBG:	
							\$755,400	
							HOME:	
							\$455,460	

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Whole-House Rehabilitation-HOME
	Goal	Provide HOME financial assistance for the whole-house rehabilitation of a minimum of thirty (305) owner-occupied housing
	Description	units for income qualified families, fifteen (15) of which will be in the SNI strategy area.

2	Goal Name	Exterior Maintenance and Storm Shelters-CDBG						
	Goal Description	Provide CDBG funding for the remediation of exterior maintenance code violations on a minimum of thirty-five (35) owner- occupied housing units for income qualified families, and installation of storm shelters for a minimum of fifteen (15) homeowners.						
3	Goal Name	Emergency Repairs-CDBG						
	Goal Description	Provide CDBG funding for emergency repairs of a minimum of one hundred (100) owner-occupied housing units for income qualified families to address immediate threats to life, health and safety.						
4	Goal Name	Downpayment and Closing Costs Assistance-HOME						
	Goal Description	Provide HOME funding for down payment and closing costs assistance for a minimum of sixty (60) households.						
5	Goal Name	CHDO New Construction/Rehab- HOME						
	Goal Description	Provide HOME funding for new construction or rehabilitation of at least eight (8) housing units for income qualified families through Community Housing Development Organizations (CHDO's) and non-profit housing providers.						
6	Goal Name	Multi-Family Rehab- CDBG						
	Goal Description	CDBG funding will be provided for the rehabilitation of multifamily rental units. The Winds House and Meadowcliff Apartments are in planning and are being vetted by Staff. The number of units to be created cannot be estimated until final plans are in place. It is anticipated that completion of the units will not occur during the 2016-17 Second Action Plan Year; therefore accomplish data below will reflect zero with future Action Plans noting the projected outcomes.						
7	Goal Name	Rehabilitation of Public Housing Units- CDBG						
	Goal Description	Provide CDBG funding to the Oklahoma City Housing Authority for the rehabilitation of a minimum of fifteen (15) public housing units.						
8	Goal Name	Affordable Housing-AHDP and RHP- CDBG and HOME						
	Goal Description	Provide HOME funding to the Rental Housing Program (RHP) and CDBG funding to OCURA AHD to increase the supply of affordable housing by four (4) units.						

9	Goal Name	Public Facilities, Srvcs, Infrastructure-SNI CDBG				
	Goal Description	Provide CDBG Funding to assist in public services and public facilities activities in the SNI neighborhoods, to include tree planting, hazardous tree removal, sidewalks, street lighting, legal assistance, park improvements, and after school programming.				
10	Goal Name	Neighborhood Capacity- CDBG				
	Goal Description	Assist a minimum of three (3) neighborhoods associations in organizing activities and implementation of CDBG eligible public facilities or services. \$50,000 of the funding noted below is to support a public infrastrure project in the Midtown neighborhood. \$75,000 is to support SNI capacity building projects in each of the three (3) SNI neighborhoods.				
11 Goal Name Special Needs Transportation Services-CDBG		Special Needs Transportation Services-CDBG				
	Goal Description	Expand transportation options using CDBG funds for homeless individuals and persons with special needs to improve accessibility, and to improve quality of life. An estimated 70,000 subsidized taxi fares and bus coupons will be provided to approximately 2700 homeless persons, seniors, and people with disabilities.				
12	Goal Name	Graffiti Removal-CDBG				
	Goal Description	Provide CDBG funding to eliminate graffiti at a minimum of four hundred (400) locations in low and moderate income neighborhoods.				
13	Goal Name	Secure Vacant and Abandoned Properties- CDBG				
	Goal Description	Provide CDBG funding for interim assistance to secure a minimum of 125 vacant and abandoned properties to address slum and blight on a spot basis.				
14	Goal Name	Small Business Technical Assistance- CDBG				
	Goal Description	Provide CDBG funding to support Technical Assistance (TA) for a minimum of ninety (90) small businesses.				

15	Goal Name	Small Business Revolving Loan Fund- CDBG
	Goal Description	Provide CDBG economic development revolving loan fund (RLF) assistance to create jobs and expand commercial services for a minimum of four (4) businesses and microenterprises annually. Loan fund was capitalized in Spring 2015 with prior year CDBG funds. No future allocations are anticipated as fund should become self-supporting.
16	Goal Name	Section 108 Loan Assistance- CDBG
	Goal Description	Apply for Section 108 loan program funds to provide Special Economic Assistance for the creation of jobs. The "funding" allocation noted below is the annual debt service on outstanding loans and not direct assistance to a specific project. It is anticipated that 71 jobs will be created upon completion of the Embassy Suites hotel in summer 2016.
17	Goal Name	Empowerment Zone Staffing- CDBG
	Goal Description	The City will promote and continue to provide staff for the ongoing implementation of the Empowerment Zone (EZ) designation, if the program is extended beyond December 31, 2015. No funding has been allocated to this activity pending confirmation of extension.
18	Goal Name	STRMU for Persons with HIV/AIDS- HOPWA
	Goal Description	Provide Short Term Rent Mortgage and Utility (STRMU) assistance using HOPWA funding to an estimated seventy (70) persons with HIV/AIDS.
19	Goal Name	TBRA for Persons with HIV/AIDS- HOPWA
	Goal Description	Provide Short Term Tenant Based Rental Assistance (TBRA) using HOPWA funding to an estimated thirty (30) persons with HIV/AIDS.
20	Goal Name	Housing for the Chronically Homeless- ESG
	Goal Description	ESG funds will be used to provide housing and case management resources for approximately fifty (50) chronically homeless, familes and veterans. Legal services will be provided to approximately ninety (90) individuals and families to reduce evictions. Shelter and outreach services will be provided to approximately six-hundred (600) homeless youth and seniors, victims of domestic violence, and individuals with mental illness. Approximately eighty (80) homeless households with children will receive rapid re-housing and prevention services.

21	Goal Name	Administration
	Goal Description	Provide administrative and management support for federal CDBG and HOME programs. CDBG includes Administrative support, Planning support, and Fair Housing Complaint processing.

Table 7 – Goal Descriptions

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

It is estimated that **434** households will be assisted in obtaining or retaining affordable housing. This includes the following:

- **30** whole house rehabs
- **50** exterior maintenance repairs
- **100** emergency home repairs
- **60** recepients of down payment assistance
- 8 CHDO homes
- **3** non-profit homes constructed
- **3** single family homes for sale to low-income households
- **70** STRMU recepients
- 30 TBRA recepients
- **80** recepients of rapid re-housing services

AP-35 Projects - 91.220(d)

Introduction

The following initiatives and goals for the Second Action Year Plan are consistent with those established in the Five-Year Consolidated Plan with an effective date of July 1, 2016, and are compatible with the purposes set forth in **24 CFR Section 91.1**, that include:

- 1. 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, as well as single and multi-family rental rehabilitation and new construction program activities
- 2. Economic Development activities targeting the low and moderate income areas, Empowerment Zone, and the Neighborhood Revitalization Strategy Area.
- 3. Neighborhood improvement projects in low and moderate income areas, Empowerment Zone, and the Neighborhood Revitalization Strategy Area.
- 4. Assistance to the homeless and special needs populations through the Emergency Shelter Grant Program, Housing Opportunities for Persons with HIV/AIDS and Continuum of Care Program.

The goals and objectives that are addressed in this Second Action Year Plan specifically relate to the goals outlined in the 2015-2020 Consolidated Plan and the Department of Housing and Urban Development goals that include:

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

The program activities are outlined below as they relate to availability/accessibility, affordability, and sustainability with regard to decent housing, suitable living environment and economic opportunity.

Oklahoma City's formula grant funding allocations, recommended for adoption the Second Action Year Plan (fiscal year July 1, 2016 through June 30, 2017), follow the priorities established in the new fiveyear Consolidated Plan that expires June 30, 2020. The Second Annual Action Year Plan strategy contains specific funding recommendations to implement the goals established in the five-year Plan tables to the extent possible depending on federal funding allocations awarded to Oklahoma City.

The funding recommendations for the 2016-2017 Second Action Year Plan were considered by the Citizen's Committee for Community Development on February 16, 2016, and received their favorable recommendation. The funding recommendations were next considered by the Neighborhood Conservation Committee on March 1, 2016, and received their favorable recommendation. Final Plan approval was granted by the City Council on April 26, 2016.

#	Project Name	
1	Targeted Area DPA	
2	Non-Target Area Down Payment Assistance	
3	OKC Housing Assistance Program-Whole House Rehab	
4	SNI Program Whole House Rehabs-HOME	
5	SNI Non-Profit Housing Construction	
6	AHDP- Mitchford Project	
7	CHDO Set-Aside Activities: Loan Pool and New Construction	
8	OKC Housing Assistance Program-Exterior Maintenance	
9	OKC Housing Assistance Program-Storm Shelter Program	
10	Oklahoma City Housing Authority-Public Housing Rehabs	
11	CAA Emergency Home Repair Program	
12	OCURA Affordable Housing Development	
13	CDBG Affordable Housing Rehabilitation Program	
14	Housing Exterior Maintenance and Storm Shelters-SNI	
15	Public Services- SNI Hazardous Tree Removal	
16	Public Services- SNI After School Programs	
17	Public Services- SNI Legal Assistance to Homeowners	
18	Public Services- SNI Education Programs	
19	Public Facilities- SNI Neighborhood-led Projects	
20	Public Facilities- SNI Tree Planting	
21	Public Facilities- SNI Sidewalks	
22	Public Facilities- SNI Park Improvements	
23	Public Services- COTPA (Embark) Share-a-Fare Program	
24	Public Services-CAA Graffiti Removal	

#	Project Name
25	Public Serivces-OKC Abandoned Housing
26	Midtown Neighborhood Improvement Project
27	Community Dev Program- Public Facilities/Infrastructure-CDBG
28	CAA Small Business Services
29	HUD Section 108 Loan Repayment
30	Urban Renewal Authority-Economic Opportunity
31	CDBG Commercial District Economic Development RLF
32	Empowerment Zone Staff Support
33	Administration-Metro Fair Housing Council
34	Administration-Planning
35	Administration- CDBG and HOME
36	ESG Activities
37	HOPWA Activities

Table 8 – Project Information

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

Basis for Category Priority

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

- 1. Preservation of existing housing stock, particularly in the Neighborhood Revitalization Strategy Area where the greatest concentration of lower-income persons and minorities reside. Funding is allocated to fund rehabilitation of private homes, provide for emergency home repair, exterior maintenance repair, and rehabilitation of public housing units.
- 2. Permanent housing for the chronic homeless that includes persons with serious mental illness, substance abuse, and other disabilities. Funds can be allocated to match other grant in aid programs, or to accumulate sufficient funds to start a sponsored permanent homeless housing projects.
- 3. Emergency shelter and the provision of social services to homeless persons, families, and special needs populations is a high priority. All of the Emergency Solutions Grant funds are allocated to provide shelters with operating funds and services to care for this special population.
- 4. Down payment and closing cost assistance to increase the affordability of home ownership.

- 5. Increasing the supply of affordable housing is a high priority. Community Housing Development Organizations (CHDOs) and other non-profits are eligible to apply for allocations of HOME funds to construct new homes, or purchase/rehab homes for eligible owner households.
- 6. Objectives that improve the quality of owner housing have a high priority including emergency home repair, housing exterior maintenance and whole house rehabilitation.
- 7. Objectives that improve the quality of public housing have high priority.

Obstacles to Meeting Underserved Needs

Local and federal resources are insufficient to address all community needs, even those of high priority. In some instances, there are perceptions in the community that affordable housing will decrease area property values and facilitate other societal problems (NIMBY issues).

AP-38 Projects Summary

Project Summary Information

Table 9 – Project Summary

Pro	Projects AP-38 Projects Summary Project Summary Information Table 9 – Project Summary		
1	Project Name	Targeted Area DPA	
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	
	Goals Supported	Downpayment and Closing Costs Assistance-HOME	
	Needs Addressed	Affordability of Owner-Occupied Housing	
	Funding	HOME: \$560,000	
	Description	Provide HOME funds for down payment and closing costs assistance up to \$15,000 for low and moderate income homebuyers within the SNI neighborhoods and the NRSA.	
	Target Date	6/30/2017	
	Estimate the number and type of families that will benefit from the proposed activities	An estimated thirty-five (35) households will be provided down payment and closing costs assistance for homes within targeted neighborhoods.	
	Location Description	Funding is restricted to the SNI and NRSA neighborhoods.	
	Planned Activities	Down Payment and closing costs assistance to low and moderate income homebuyers.	
2	Project Name	Non-Target Area Down Payment Assistance	
	Target Area		

	Goals Supported	Downpayment and Closing Costs Assistance-HOME
	Needs Addressed	Affordability of Owner-Occupied Housing
	Funding	HOME: \$140,000
	Description	Provide HOME funding for down payment and closing costs assistance to twenty-five (25) low to moderate income homebuyers in non-targeted neighborhoods within the DPA program boundaries.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	An estimated twenty-five (25) low income families will be provided downpayment and closing costs assistance to purchase homes in non-targeted areas.
	Location Description	Homes must be purchased withn the DPA program boundaries area.
	Planned Activities	Down payment and closing costs assistance.
3	Project Name	OKC Housing Assistance Program-Whole House Rehab
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Whole-House Rehabilitation-HOME
	Needs Addressed	Quality of Affordable Owner Housing
	Funding	HOME: \$1,727,547
	Description	Provide HOME financial assistance for the whole-house rehabilitation of a minimum of fifteen (15) owner- occupied housing units.
	Target Date	6/30/2017

	Estimate the number and type of families that will benefit from the proposed activities	An estimated fifteen (15) low income homeowners will be assisted with whole house rehabilitation.
	Location Description	City-wide, with priority placed on properties within the SNI and NRSA neighborhoods.
	Planned Activities	Whole House Rehabilitations
4	Project Name	SNI Program Whole House Rehabs-HOME
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Whole-House Rehabilitation-HOME
	Needs Addressed	Quality of Affordable Owner Housing
	Funding	HOME: \$996,127
	Description	HOME Funding to support the rehabilitation of fifteen (15) whole-house rehabs for owner-occupied homes in the SNI neighborhoods.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	An estimated fifteen (15) low income owner-occupied households within the SNI neighborhoods will receive whole house rehabilitation.
	Location Description	Restricted to Homes within the SNI boundaries.
	Planned Activities	Whole-house Rehabilitations
5	Project Name	SNI Non-Profit Housing Construction
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative

Goals Supported	Affordable Housing-AHDP and RHP- CDBG and HOME
Needs Addressed	Supply of Affordable Owner-Occupied Housing
Funding	HOME: \$248,313
Description	HOME funding to support new construction of two (2) home ownership units in SNI Neighborhoods.
Target Date	6/30/2017
Estimate the number and type of families that will benefit from the proposed activities	Two loan income households will achieve homeownership from the proposed activity within the SNI neighborhoods.
Location Description	Units are located at 147 NE 15th St and 1609 N. Walnut St.
Planned Activities	Two (2) new units will be constructed on a single lot. The project may be two single family units; or alternatively, a duplex with dual ownership.
Project Name	AHDP- Mitchford Project
Target Area	NEIGHBORHOOD STRATEGY AREA
Goals Supported	Affordable Housing-AHDP and RHP- CDBG and HOME
Needs Addressed	Supply of Affordable Owner-Occupied Housing
Funding	HOME: \$334,170
Description	Prior year funding to support the construction of three (3) new single family homes for sale to low and moderate income buyers in the SNI neighborhoods.
Target Date	6/30/2017
Estimate the number and type of families that will benefit from the proposed activities	Three (3) low income households will achieve homeownership within the SNI target area.

	Location Description	Subject properties are located 1729, 1733, and 1741 Euclid Street
	Planned Activities	New construction of for-sale housing
7	Project Name	CHDO Set-Aside Activities: Loan Pool and New Construction
	Target Area	
	Goals Supported	CHDO New Construction/Rehab- HOME
	Needs Addressed	Supply of Affordable Owner-Occupied Housing
	Funding	HOME: \$1,155,011
	Description	HOME funding provided for new construction or rehabilitation of a minimum of eight (8) housing units through Community Housing Development Organizations (CHDO's) and non-profit housing providers (JPNA, NHS, OKC Housing Services Redevelopment Corp).CHDO Set-aside is allocated to local CHDO's for multiple projects, both rehab and new construction. All funds allocated through the CHDO Loan Pool must be repaid.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	Approximately eight (8) housing units will be constructed or rehabilited with CHDO set-aside funds during the Second Action Year Plan. Actual estimates of production cannot be provided until all funds have been allocated. Estimating eight (8) units of homeowner housing for low and moderate income families based on historical fund activity.
	Location Description	City-wide
	Planned Activities	New construction and/or rehabilitation
8	Project Name	OKC Housing Assistance Program-Exterior Maintenance
	Target Area	City-wide, with priority for properties located within the SNI and NRSA neighborhoods.
	Goals Supported	Exterior Maintenance and Storm Shelters-CDBG
	Needs Addressed	Quality of Affordable Owner Housing

	Funding	CDBG: \$1,184,000
	Description	Provide CDBG funding to remediate exterior maintenance code problems for an estimated fifty(50) low to moderate income homeowners.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	An estimated fifty (50) low income households will receive exterior home maintenance.
	Location Description	City-wide, with priority for properties located within the SNI neighborhoods and the NRSA.
	Planned Activities	Exterior Maintenance
9	Project Name	OKC Housing Assistance Program-Storm Shelter Program
	Target Area	
	Goals Supported	Exterior Maintenance and Storm Shelters-CDBG
	Needs Addressed	Quality of Affordable Owner Housing
	Funding	CDBG: \$50,000
	Description	An estimated ten (10) low income households will be provided storm shelters.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	An estimated ten (10) low income households will be provided storm shelters.
	Location Description	City-wide
	Planned Activities	Installation of Storm Shelters

10	Project Name	Oklahoma City Housing Authority-Public Housing Rehabs
	Target Area	
	Goals Supported	Rehabilitation of Public Housing Units- CDBG
	Needs Addressed	Quality of Public Housing
	Funding	CDBG: \$234,897
	Description	Provide CDBG funding to the Oklahoma City Housing Authority (OCHA) for the rehabilitation of and estimated fifteen (15) public housing units.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	An estimated Fifteen (15) extremely low income households will access or maintain a rehabilitated public housing unit.
	Location Description	Funding restricted to OCHA operated public housing units.
	Planned Activities	Rehabilitation
11	Project Name	CAA Emergency Home Repair Program
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Emergency Repairs-CDBG
	Needs Addressed	Quality of Affordable Owner Housing
	Funding	CDBG: \$587,242
	Description	Provide CDBG funding to Community Action Agency (CAA) to fund emergency home repairs for a minimum of one hundred (100) homes for low to moderate income homeowners to address immediate threats to life, health and safety.

	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	A minimum of one hundred (100) low to moderate income households will receive emergency home repairs.
	Location Description	City-wide, with priority given to properties located within the SNI neighborhoods and the NRSA.
	Planned Activities	Emergency home repairs.
12	Project Name	OCURA Affordable Housing Development
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Affordable Housing-AHDP and RHP- CDBG and HOME
	Needs Addressed	Supply of Affordable Owner-Occupied Housing Supply of Affordable Rental Housing
	Funding	CDBG: \$84,529
	Description	Administrative support to the Oklahoma City Urban Renewal Authority (OCURA) for the development of affordable housing.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	Funding is for administrative support. Beneficiaries will be reported under individual project activities.
	Location Description	City-wide, with priority to project developments within the NRSA, SNI neighborhoods and Urban Renewal Areas.
	Planned Activities	Administrative support for affordable housing development.
13	Project Name	CDBG Affordable Housing Rehabilitation Program

	Target Area	
	Goals Supported	Multi-Family Rehab- CDBG
	Needs Addressed	Supply of Affordable Rental Housing
	Funding	CDBG: \$982,445
	Description	Provide CDBG funding for the rehabilitation of multifamily or other rental units.
	Target Date	6/30/2018
	Estimate the number and type of families that will benefit from the proposed activities	Approved projects are in planning and not yet under construction. It is not anticipated that there will be units completed during the Second Action Plan Year. The total in future years is yet to be determined as final project plans have not yet been approved.
	Location Description	Prior year funding has been allocated for the support of the Winds House, Meadowcliff Senior Apartments, and City Care.
	Planned Activities	Rehab of multi-family rental housing
14	Project Name	Housing Exterior Maintenance and Storm Shelters-SNI
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Exterior Maintenance and Storm Shelters-CDBG
	Needs Addressed	Quality of Affordable Owner Housing
	Funding	CDBG: \$100,000
	Description	Exterior maintenance and/or storm shelters will be provided to an estimated ten (10) low income owner- occupied households in SNI neighborhoods.
	Target Date	6/30/2017

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	Estimate the number and type of families that will benefit from the proposed activities	An estimated ten (10) low income owner-occupied households in SNI neighborhoods will be assisted with exterior maintenance and/or storm shelters.
	Location Description	Restricted to owner-occupied residences within the SNI program area boundaries.
	Planned Activities	Exterior Maintenance and Storm Shelters
15	Project Name	Public Services- SNI Hazardous Tree Removal
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure
	Funding	CDBG: \$48,000
	Description	CDBG funds provided to trim and/or remove hazardous trees that pose a threat to personal and public safety in SNI neighborhoods.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	Forty (40) low to moderate income households will receive assistance in the removal of hazardous trees.
	Location Description	Funding is restricted to the SNI neighborhoods.
	Planned Activities	Public services-Hazardous tree removal
16	Project Name	Public Services- SNI After School Programs
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative

	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure Strengthen Neighborhood Capacity
	Funding	CDBG: \$250,000
	Description	CDBG funding to support summer and after-school programming and tutoring for students in two (2) SNI neighborhoods.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	An estimated Five Hundred thirty (530) students in SNI neighborhoods will be provided access to tutoring and after-school programming.
	Location Description	Funds are restricted to the SNI neighborhoods
	Planned Activities	Public Services- After school programming and tutoring
17	Project Name	Public Services- SNI Legal Assistance to Homeowners
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure
	Funding	CDBG: \$24,999
	Description	Provide legal fee assistance to homeowners and/or non-profit organizations in SNI neighborhoods using CDBG funds to assist in resolving title and probate issues to enable refinancing, home equity loans, and/or sale to third parties.
	Target Date	6/30/2017

	Estimate the number and type of families that will benefit from the proposed activities	Twenty (20) low to moderate income homeowners and/or three (3) non-profit organizations will obtain legal assistance.
	Location Description	Funds restricted to the SNI neighborhoods
	Planned Activities	Public Services-Legal assistance
18	Project Name	Public Services- SNI Education Programs
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure
	Funding	CDBG: \$10,000
	Description	CDBG funds provided to assist in general public service educational efforts for youth, crime and health topics.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	Seventy-Five (75) low to moderate income persons will receive public services education
	Location Description	Funds are restricted to SNI Neighborhoods
	Planned Activities	Public Services-General education topics
19	Project Name	Public Facilities- SNI Neighborhood-led Projects
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative

	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure Strengthen Neighborhood Capacity
	Funding	CDBG: \$75,000
	Description	CDBG funding to support SNI neighborhood-led public facilities improvement projects.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	Three (3) SNI neighborhoods will be assisted with neighborhood-led public facilities improvements.
	Location Description	Funds restricted to SNI neighborhoods
	Planned Activities	Public Facilities- Neighborhood improvements
20	Project Name	Public Facilities- SNI Tree Planting
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure
	Funding	CDBG: \$10,000
	Description	CDBG funds provided to assist in tree planting efforts in SNI neighborhoods.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	One Hundred (100) low to moderate income homeowners will have trees planted on their property in SNI neighborhoods.

	Location Description	Funds are restricted to the SNI neighborhoods
	Planned Activities	Public Facilities-Tree Planting
21	Project Name	Public Facilities- SNI Sidewalks
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure
	Funding	CDBG: \$450,000
	Description	CDBG funds provided for sidewalks in the SNI Neighborhoods.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	Fifty (50) low to moderate income homeowners will benefit from new sidewalks in SNI neighborhoods.
	Location Description	Funds are restricted to the SNI neighborhoods. Project will be concentrated over 3 Blocks on NW 15th Street in the Classen-Ten-Penn Neighborhood.
	Planned Activities	Public Infrastructure-Sidewalks
22	Project Name	Public Facilities- SNI Park Improvements
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure
	Funding	CDBG: \$601,719

	Description	CDBG funds to support park improvements in SNI neighborhoods. \$200,000.00 is allocated for improvements at McKinley Park in the Classen-Ten-Penn SNI neighborhood. The remaining \$401,718.71 is allocated for park improvements at the Harn Farmstead in the Culbertson East Highlands SNI neighborhood.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	Two (2) parks in the SNI neighborhoods will be assisted with public facility improvements.
	Location Description	Funds are restricted to the SNI neighborhoods. Projects are located at McKinley Park in the Classen Ten- Penn neighborhood and at the Harn Farmstead in the Culbertson's East Highlands neighborhood.
	Planned Activities	Public Facilities- Park Improvements
23	Project Name	Public Services- COTPA (Embark) Share-a-Fare Program
	Target Area	
	Goals Supported	Special Needs Transportation Services-CDBG
	Needs Addressed	Transportation Options -Special Needs Population
	Funding	CDBG: \$102,842
	Description	CDBG funding is provided for an estimated 13,000 subsidized taxi fares and bus tokens for approximately five hundred (500) low and moderate income special needs populations, including the homeless, elderly persons over age 62, and persons with disabilities.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	70,000 discounted taxi fares and bus tokens will be provided to approximately 2,700 persons with special needs.
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	Location Description	City-wide
	Planned Activities	Discounted taxi fare and bus coupons for low and moderate income special needs populations.
24	Project Name	Public Services-CAA Graffiti Removal
	Target Area	
	Goals Supported	Graffiti Removal-CDBG
	Needs Addressed	Public Services-Graffiti Removal
	Funding	CDBG: \$15,011
	Description	CDBG funding to support the elimination of graffiti for two hundred (200) locations in low and moderate income neighborhoods as a crime prevention activity.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	Graffiti will be removed at four hundred (400) locations within low and moderate income neighborhoods. A greater community benefit exists as a crime prevention activity but cannot be quantitatively measured apart from the location of the properties served.
	Location Description	City-wide
	Planned Activities	Graffiti removal
25	Project Name	Public Serivces-OKC Abandoned Housing
	Target Area	
	Goals Supported	Secure Vacant and Abandoned Properties- CDBG
	Needs Addressed	Address Slum and Blight- Vacant Abandoned Bldgs
	Funding	CDBG: \$68,562
	Description	CDBG funding for interim assistance to secure a minimum of 125 vacant and abandoned properties to eliminate slum and blight on a spot basis.

	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 125 vacant and abandoned homes will be secured in low and moderate income neighborhoods to remove imminent threats to life, health and safety. A greater community benefit exists; however, it cannot be quantitatively measured apart from the properties secured.
	Location Description	City-wide
	Planned Activities	Secured vacant buildings
26	Project Name	Midtown Neighborhood Improvement Project
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure
	Funding	CDBG: \$50,000
	Description	Prior year public infrastructure activity to provide street lighting in the Midtown neighborhood for pedestrian safety.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 4,000 persons will benefit from installation of new kiosks/monument signs in the Midtown neighborhood.
	Location Description	Midtown Neighborhood
	Planned Activities	Sign Kiosks Installation
27	Project Name	Community Dev Program- Public Facilities/Infrastructure-CDBG
	Target Area	

	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Sustainability Service Provider Facilities-CDBG
	Funding	CDBG: \$1,455,435
	Description	Funding reserved but not yet allocated to support public facilities, housing, infrastructure improvements, and needs of social service providers. Several applications for funding have been received but have not yet been fully vetted by staff.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	The Care center provices direct services to approximately eight hundred (800) children annually. An additional 2,400 children are provided advocacy services. In regards to future projects not yet approved, It is estimated that any facility supported will provide benefits to a minimum of two hundred (200) persons annually.
	Location Description	City-wide
	Planned Activities	Rehabilitation and infrastructure
28	Project Name	CAA Small Business Services
	Target Area	City-Wide
	Goals Supported	Small Business Technical Assistance- CDBG
	Needs Addressed	Economic Opportunities for Low and Moderate Income
	Funding	CDBG: \$39,149
	Description	CDBG funding provided for technical assistance to a minimum of ninety (90) small businesses.
	Target Date	06/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	An estimated Ninety (90) small businesses will be provided with technical assistance.
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	ocation Description	City-wide
Р	Planned Activities	Small business technical assistance.
29 P	Project Name	HUD Section 108 Loan Repayment
т	arget Area	NEIGHBORHOOD STRATEGY AREA
G	Goals Supported	Section 108 Loan Assistance- CDBG
N	leeds Addressed	Economic Opportunities for Low and Moderate Income
F	unding	CDBG: \$350,000
D	Description	The City has been approved for a Section 108 loan to support the development of the 21C Museum Hotel in the historic Film Row District. The assistance received will support the creation of 138 FTE jobs in the Second Action Plan Year. The allocated funding is the anticipated debt service on outstanding Section 108 loans. In addition to 21C, an Embassy Suites hotel funded in prior years was completed in the Spring 2015, resulting in the creation of 77 FTE jobs reported in the First Action Plan Year. The City will consider other projects for use of Section 108 as opportunities arise. The allocated funding noted below is the anticipated debt service on outstanding Section 108 loans which would be payable to HUD from CDBG entitlement funds if a financed project were to fail. If all loans are repaid timely, no funds will be expended for this activity.
т	arget Date	6/30/2017
ty b	Estimate the number and ype of families that will penefit from the proposed activities	It is anticipated that One Hundred Thirty-Eight (138) jobs will be created in the Second Action Year Plan period.
L	ocation Description	The 21C Museum Hotel is located at 900 W. Main Street. Addresses of future projects are yet to be determined.
Р	Planned Activities	Hotel development and job creation
³⁰ P	Project Name	Urban Renewal Authority-Economic Opportunity

ioals Supported	Multi-Family Rehab- CDBG Affordable Housing-AHDP and RHP- CDBG and HOME
leeds Addressed	Acquisition/Clearance of Vacant, Blighted Property
unding	CDBG: \$788,880
Description	Funding to increase the sustainability of Oklahoma City Urban Renewal Authority close out districts and local Urban Renewal project areas to include acquisition, disposition, relocation, and Urban Renewal completion to address slum and blight.
arget Date	6/30/2017
stimate the number and ype of families that will enefit from the proposed ctivities	The number of program beneficiaries is contingent on the size and scale of projects funded.
ocation Description	Urban Renewal project areas
lanned Activities	Acquisition, disposition, clearance, relocation and Urban Renewal completion
roject Name	CDBG Commercial District Economic Development RLF
arget Area	
ioals Supported	Small Business Revolving Loan Fund- CDBG
leeds Addressed	Economic Opportunities for Low and Moderate Income
unding	CDBG: \$750,000
Description	Provide revolving loan fund (RLF) assistance to a minimum of four (4) businesses or microenterprises to create jobs and/or expand commercial services for low-mod benefit or limited clientele. This activity wa capitalized with prior year CDBG funding. No additional contributions are anticipated.
arget Date	6/30/2017
	leeds Addressed unding bescription arget Date stimate the number and ype of families that will enefit from the proposed ctivities ocation Description lanned Activities roject Name arget Area ioals Supported leeds Addressed unding bescription

	Estimate the number and type of families that will benefit from the proposed activities	A minimum of four (4) new or expanding businesses or microenterprises will be supported resulting in job creation and/or job retention. The amount of employees added or retained will vary based upon the size and needs of the businesses supported.
	Location Description	Businesses must be located within the boundaries of a Commercial District Revitalization Program Area or Business Improvement District (excluding the downtown central business district).
	Planned Activities	Financial support for business start-ups and expansions
32	Project Name	Empowerment Zone Staff Support
	Target Area	
	Goals Supported	Empowerment Zone Staffing- CDBG
	Needs Addressed	Economic Opportunities for Low and Moderate Income
	Funding	
	Description	The City will continue to provide staff support for continued implementation of the Empowerment Zone designation, if the program is extended beyond December 31, 2014 with a future legislative action. No funding is allocated at the present time.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	The Empowerment Zone designation expired on December 31, 2015 and has not yet been extended. No beneficiaries have been identified as future of the program is unknown.
	Location Description	Restricted to the EZ eligible boundaries
	Planned Activities	Administration-Staff Support
33	Project Name	Administration-Metro Fair Housing Council
	Target Area	

	Goals Supported	Administration
	Needs Addressed	Administration
	Funding	CDBG: \$82,745
	Description	Funding is provided to the Metro Fair Housing Council to undertake all Fair Housing activities on behalf of the City to include enforcement, education and compliance.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	Funding will support approximately 465 Housing Complaint Intakes, 22 Formal Housing Discrimination Complaints, 31 Fair Housing/Fair Lending Rights Seminars, 42 Requests for Reasonable Accommodation or Modification, and 69 Fair Housing Tests.
	Location Description	
	Planned Activities	Fair Housing activities
34	Project Name	Administration-Planning
	Target Area	
	Goals Supported	Administration
	Needs Addressed	Administration
	Funding	CDBG: \$50,000
	Description	Administration-Planning activities to support the CDBG program including preparation of neighborhood plans, the annual Action Plan, the Consolidated Annual Performance Evaluation Report (CAPER) and the five year Consolidated Plan.
	Target Date	6/30/2017

35	Estimate the number and type of families that will benefit from the proposed activities	Beneficiaries of Planning support will be reported under individual projects and activities.
	Location Description	City-wide
	Planned Activities	Administrative and Planning activities related to plan preparation.
	Project Name	Administration- CDBG and HOME
	Target Area	
	Goals Supported	Administration
	Needs Addressed	Administration
	Funding	CDBG: \$755,400 HOME: \$455,460
	Description	Administrative expenses for CDBG and HOME program operations and management.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	Beneficiaries will be reported under individual program activities.
	Location Description	City-wide
	Planned Activities	Program Administration
36	Project Name	ESG Activities
	Target Area	
	Goals Supported	Housing for the Chronically Homeless- ESG

Needs Addressed	Supportive Housing for the Chronically Homeless Services for Homeless Youth (Age 21 and under) Sustainability of Transitional Housing Increased Employment Rate for CoC Participants Homeless Households with Children Public Facilities, Services and Infrastructure
Funding	ESG: \$388,987
Description	ESG Funds will be used for the following Activities: 1) To provide housing and case management resources for up to fifty (50) chronically homeless individuals and veterans. 2) To provide support for the planning and development of one (1) Drop-in facility for homeless youth to be completed in a future program year. 3) To decrease the number of homeless households with children by providing rapid re-housing and prevention resources for eighty (80) families. 4) To reduce evictions by providing legal services for up to ninety (90)individuals and families. 5) To provide health care services to over 1,500 low income and homeless individuals. 6) To provide shelter and outreach services for six hundred (600) youth and elderly individuals, victims of domestic violence, and individuals with mental illness.
Target Date	6/30/2017
Estimate the number and type of families that will benefit from the proposed activities	It is projected that two thousand (2,000) extremely low income homeless households and individuals will access ESG services. This total does not include a proposed Drop-in Center for homeless youth since that activity has not been previously funded and there is no historical data available to project the number of beneficiaries.
Location Description	City-wide
Planned Activities	Housing for the chronically homeless, supportive case management and social services, employment assistance, rapid re-housing, homelessness prevention, and a public facility for homeless youth.
7 Project Name	HOPWA Activities
Target Area	

Goals Supported	STRMU for Persons with HIV/AIDS- HOPWA TBRA for Persons with HIV/AIDS- HOPWA
Needs Addressed	Housing Availability-Persons With HIV/AIDS
Funding	HOPWA: \$544,334
Description	Tenant Based Rental Assistance (TBRA) will be provided to thirty(30) low or extremely low income households to prevent homelessness. Short Term Rent, Mortgage and Utility (STRMU) assistance to prevent homelessness will be provided for seventy (70) eligible persons or households.
Target Date	6/30/2017
Estimate the number and type of families that will benefit from the proposed activities	Approximately One Hundred (100) low income households affected by HIV/AIDS will benefit from the proposed activities.
Location Description	City-Wide
Planned Activities	Short term rental assistance to prevent homelessness.

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 2013 ACS data, The City of Oklahoma City is comprised of just over 610,000 persons contained within a land area of over 620 square miles. The community is racially diverse with a total minority population exceeding 31%. The minority population in Oklahoma City remains in transition. In the 2013 American Community Survey, persons of Hispanic or Latino origin represent 19.3% of the total population. African American persons, formerly the largest minority/ethnic population in Oklahoma City, now comprise 14% 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). Both designations have expired as of December 31, 2015. 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, 104700, 104800, 104900, 105600, 105700, 105800, 1053002, 1053003, 1070012, 1070013, 1070014, 1070021, 1070022, and 1073051.

Geographic Distribution

Target Area	Percentage of Funds			
NEIGHBORHOOD STRATEGY AREA	80			
Table 10. Coographic Distribution				

Table 10 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City targets resources strategically to support neighborhood revitalization efforts in the areas with the greatest community need. The Strong Neighborhoods Initiative (SNI) is a concentrated effort by the City to identify and revitalize those communities that have suffered from recent disinvestment with a goal of ending decline and restoring neighborhoods to economically viable and sustainable communities. Rather than allocate funds sporadically throughout the City on a haphazard basis, we have chosen to focus resources strategically in a manner that will allow for noticeable improvement and

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positive impact over the long term.

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

Discussion

The City of Oklahoma City strives to invest 80% of federal CDBG and HOME dollars within the NRSA, with an additional 20% allocated to projects and activities outside the NRSA boundaries. *The SNI neighborhoods lie within the NRSA* and are strategically targeted for reinvestment. Resources are allocated to SNI neighborhoods to the greatest extent possible.

Affordable Housing

AP-55 Affordable Housing - 91.220(g)

Introduction

The objectives of the 2015-2019 Consolidated Plan and the First Action Year Plan were developed through review and analysis of CHAS data, consultations with service providers, input from citizens on the development of the plan, and an analysis of community needs and objectives as identified in the Needs Analysis. In the 2016-17 Second Action Year Plan, the City of Oklahoma City will continue to prioritize annual allocations based upon the objectives identified in the Consolidated Plan.

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

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

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

The one year housing goals noted below are based on proposed goals and activities for the 2016-2017 Annual Action Plan year. It is anticipated that these annual goals will be largely consistent over the five (5) year term of this Plan, provided that annual allocations from HUD are not substantially reduced. The estimates provided do not include the provision of emergency shelter, transitional shelter, or social services. The numbers for rehabilitation include whole house rehab, public housing unit rehabs, storm shelter installation, and emergency home repairs. Units purchased using down payment assistance are included in the production of new units field.

One Year Goals for the Number of Households to be Supported		
Homeless	2,230	
Non-Homeless	90	
Special-Needs	600	
Total	2,920	

Table 11 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through				
Rental Assistance	100			
The Production of New Units	75			
Rehab of Existing Units	180			
Acquisition of Existing Units	0			
Total	355			

 Table 12 - One Year Goals for Affordable Housing by Support Type

Discussion

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

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

Homeowners may experience some relief from cost burden through refinancing transactions with reputable lenders. Homeowners considering a refinancing transaction at a lower rate must avoid refinancing through predatory lenders.

Programs to Assist Homeowners:

- CDBG Emergency Home Repair Program
- CDBG Exterior Maintenance and Storm Shelter Program
- HOME Housing Rehabilitation Program
- Lead-based paint abatement in conjunction with the three previous listed programs
- Section 8 Homeownership Program.

Projected 2016-2017 Housing Accomplishments:

- 100 Emergency home repairs
- 50 Exterior Maintenance projects
- 30 Whole house rehabilitation projects
- 60 Down Payment Assistance Loans
- 8 CHDO Homes Constructed
- 4 CUDI Rentals Constructed
- 1 OCURA Home Constructed
- 3 Non-Profit SNI Homes Constructed

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- 15 Public Housing Unit Rehabs
- 100 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 Second Action Plan Year to support the rehabilitation of approximately fifteen (15) 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 maintain and manage their properties; however, are unable to make all of the needed upgrades and repairs. All housing is considered "average" by the Housing Authority. The City will provide CDBG funding for rehabilitation of approximately fifteen (15) public housing units.

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

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

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

Not Applicable

Discussion

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

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

Introduction

In 2009 the Homeless Prevention and Rapid Rehousing (HPRP) program was created by the American Recovery and Reinvestment Act. This unprecedented funding offered an opportunity to change the way homeless services are delivered in Oklahoma City. This program 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 who are 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

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

Activities supported in the First Action Year Plan to address homelessness included CDBG and HOME funding for the completion of a twenty (20) unit SRO project on the WestTown homeless campus for persons transitioning to permanent housing. This project has been completed and will be fully drawn by the beginning of the Second Action Plan Year. HOPWA funding is used to support the provision of Short Term Mortgage and Utility Assistance (STRMU) and Tenant Based Rental Assistance (TBRA). ESG funds continue to support housing and case management activities for families and veterans. ESG funding is also committed for rapid re-housing and prevention services for homeless households with children. Lastly, ESG funding supported the creation of one drop-in center for homeless youth in the First Action Plan Year. A second facility is expected to begin next year, and efforts will be made to complete a total

of four (4) facilities during the Five (5) year Consolidated Plan period.

Addressing the emergency shelter and transitional housing needs of homeless persons

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

Helping homeless persons (especially chronically homeless individuals and families, families

with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

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

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

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

ESG funding allocated in the Second 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 provide assistance in locating and moving households to housing units that meet minimum housing standards. Households receiving prevention assistance may require minimum supportive services and follow-up care. The case manager is responsible for providing the appropriate supportive services and follow-up care, as needed on a case by case basis. It is anticipated that most prevention assistance will last for one (1) to six (6) months. A standardized housing assessment and housing plan will be completed for all program participants to ensure housing stability after ESG assistance terminates.

Prior to issuing financial assistance, case managers work with the Housing Resource Locator to conduct a

habitability and lead-based paint inspection of the home. A visual assessment/inspection for potential lead-based paint hazards is conducted for all pre-1978 units in which a pregnant woman and/or child under the age of six will be residing before financial assistance is provided. Visual assessments/inspections must be conducted regardless of whether the program participant is receiving assistance to remain in an existing unit or moving to a new unit. All case managers are required to become a HUD-certified Lead-Based Paint Visual Assessor by successfully completing the 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 will typically contact the landlord or utility company immediately in an effort to pledge assistance to prevent or delay imminent eviction or utility cutoff. If the case manager/Housing Resource Locator deems the housing to be substandard, then the case manager works with the household and the Housing Resource Locator to locate and secure more appropriate housing. Program participants must demonstrate they are capable of earning income adequate 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 a follow up on a monthly basis, or more frequently if 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 days and seek HORIZON'S network support and technical assistance, as needed, to ensure proper software usage and excellent data integrity.

Though many outreach and shelter activities are supported by ESG and Continuum of Care funding, most funded activities focus on housing. Services provided include financial assistance to pay for housing, services designed to retain housing, and services to help locate appropriate and affordable housing. Since not all participants have the same level of need, not all persons receive identical levels of assistance. Activities funded for the homeless are not intended to provide long-term support for program participants, nor can funded programs address all of the 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	70	
Tenant-based rental assistance	30	
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0	
Units provided in transitional short-term housing facilities developed, leased, or operated with		
HOPWA funds	0	
Total	100	

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

Introduction

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

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

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

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

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

- Adoption of the International Existing Building Code; This Code applies to multi-family housing and reduces financial barriers to renovating existing building by allowing greater flexibility in materials used in the renovation;
- The City has exempted impact fees for water and sewer in the core area of the city to reduce the cost of infill housing and other redevelopment efforts;
- The City has exempted the fees for permits to nonprofit builders of affordable housing;
- The City does not require engineering or architectural seals for nonprofit affordable housing developers;
- Building permit fees are waived by policy for nonprofit charitable organizations engaged in the construction or remodeling of one or two family dwellings for the purpose of providing housing assistance to low-income persons or households;
- There are no licensing requirements for builders or professionals except in the case of high-rise structures.

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

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

City Council has indicated a willingness to support changes to the existing ordinances to update protected class definitions. A revised Ordinance was passed on January 5, 2016, adopting age,

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

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

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

Discussion

The City of Oklahoma City remains committed to ensuring equal housing opportunity for all persons. Proposed Action Plan activities for the 2016-2017 Second Action Year Plan provide direct funding to the Metropolitan Fair Housing Council for the provision of fair housing training, compliance, and complaint processing functions. Staff will participate in a Fair Housing Seminar in April 2016 as part of Fair Housing Month activities, and will continue to monitor affordable housing barriers and provide resources where needed to ensure compliance.

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).

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 Second Action Year Plan and other grant funds are utilized to provide services and activities that benefit the various segments of lower-income populations in a responsible and comprehensive manner. Funds are allocated to activities that are not duplicative or competitive. Funds are allocated to activities that are designed to serve all segments of the population in the areas of concentrated lower-income persons.

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 an open solicitation to 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 limited to non-profit organizations and is awarded on a competitive basis. 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 the Downtown District, Bricktown, Core-to-Shore, Midtown, Film Row and Art District areas of the City. A second priority for use of both HOME and CDBG funding for housing is to reverse patterns of low income concentration in certain economically challenged areas of the NRSA by incentivizing mixed income housing through the aggregation of assisted housing activities.

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

Multifamily new construction or rehabilitation activities utilizing First Action Year funding will be conducted in partnership with the Oklahoma Housing Finance Agency's Low Income Housing Tax Credit Program.

Public Housing Modernization is provided through the Oklahoma City Housing Authority (OCHA). OCHA is allocated CDBG funds to make needed repairs to approximately fifteen (15) 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. Effective September 15, 2000, whenever residential rehabilitation activities funded by the City are conducted, the regulations prescribed for lead-based paint, contained at 24 CFR Part 35 will be the guide for achieving compliance. Under the regulations, the City is required to adopt proper approaches to Lead Hazard evaluation, to provide regulatory notifications to the homeowner, to perform Lead Hazard evaluation, and to follow safe work practices and clearance requirements. For activities involving rehabilitation under Subpart J, Tenant Based Rental Assistance under Subpart M, if any, and Subpart K for Homebuyers and special needs properties, options for remediation of lead based paint and potential funding sources for cleanup will be discussed with the applicant based upon the amount of funds available for each activity. CDBG funds are allocated to one or more organizations to provide technical assistance for organized neighborhoods in eligible low-income census tracts throughout the city. As a condition for receiving capacity building funds, the City will require that neighborhood organizations in CDBG-eligible census tracts be alerted to the dangers of lead-based hazards particularly for children, and urge neighborhood campaigns to have children tested for elevated lead blood levels.

The City is directly involved in alerting and educating households participating in our programs about lead hazards, and indirectly through each of its sub recipients, Community Housing Development Organizations (CHDO's), 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.

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

Actions planned to reduce the number of poverty-level families

The City does not have a formal antipoverty strategy, but has implemented numerous local and federal job creation and education programs that cumulatively work to reduce poverty. In 1993, the citizens of Oklahoma City passed the first Metropolitan Area Projects (MAPS) initiative, a five year sales tax program to construct or redevelop 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.

The initial MAPS initiative was followed by a larger "MAPS for Kids" initiative that included new construction and/or renovation of virtually all public school buildings in the Oklahoma City Public School District, and provided significant revenue for improvements in suburban school districts that educate children of Oklahoma City residents. Education serves as one of the cornerstone of most effective antipoverty strategies.

The third MAPS initiative was passed by the citizens of Oklahoma City on December 2009. MAPS 3 projects are well underway and will continue the public facilities improvements that were 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, aquatic centers for seniors, additional improvements to the Oklahoma State Fairgrounds and a white water course on the Oklahoma River. The senior centers, trails, and fairgrounds exhibition center are expected to be completed in the Second Action Plan Year. The streetcar route has been finalized and the contract for construction of the streetcars has been finalized. Land acquisition for the dowtown Core to Shore park is nearing completion and Phase I environmentals have been completed.

The total local public investment in all three MAPS programs amounts to over \$1.8 billion.

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

Actions planned to develop institutional structure

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

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

The City receives assistance in conducting the annual Point-in-Time count from the Homeless Alliance,

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

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

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

Discussion

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

At the present time, HOME down payment assistance provides a loan up to \$14,999 that is forgivable at the rate of 1/60th per month over a five-year affordability period to eligible homebuyers. When HOME funds are utilized for DPA, the maximum sales price of the home cannot exceed 95% of the area median sales price of homes in the jurisdiction. The limits are published annually by HUD and enforced in the City's DPA program.

Program Specific Requirements

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

Introduction

Program Income-The City of Oklahoma City anticipates a return of approximately \$96,026.91 in CDBG program income prior to beginning of the program year, with an additional \$75,000 anticipated in the Second Action Plan Year (2016-17). \$5,000.00 in 2015 unprogrammed CDBG funds are available for allocation. Oklahoma City does not expect to receive program income during the program year from CDBG capitalized revolving loan funds or new float funded activities. Oklahoma City did capitalize a \$750,000 revolving loan fund as a new activity using CDBG funding in early 2015; however the program is still under development and no loan repayments are expected in the First or Second Action Plan Years. Oklahoma City has not invested CDBG funds in float funded activities. Program income that is received 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. CDBG program Income generated by the Oklahoma City Housing Assistance Lead Based Paint Testing Program will be reallocated to the Oklahoma City Housing Assistance Program.
- 3. CDBG funding rebates provided by material suppliers resulting 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. All CDBG program income will be used to create additional administrative capacity, and CDBG program income may be used to fund administrative expenses during the program year in which it is realized.
- 5. In accordance with CPD Notice 97-9, III.J., HOME Program Income deposited to the PJ's letter of credit and that creates additional administrative capacity may be used by the PJ for administrative expenses incurred during the Action Year, and any excess administrative capacity will be carried forward to subsequent years.

Preceding Program Year Income-Oklahoma City forecasts program income and allocates the forecasted program income in Annual Action Year Plans. All program income 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. At the present time, only one Section 108 Loan Guarantee has not been fully disbursed. The Small Business Assistance Section 108 Loan was established to provide access to capital for small businesses located in the NRSA. Proceeds from loan payments and interest earned on all loan repayment accounts associated with the Section 108 Loan Guarantees are used to make debt service payments.

Surplus Funds- The City of Oklahoma City anticipates a return of approximately \$96,026.91 in CDBG Program Income prior to the beginning of the Second Action Year Plan, with an additional \$75,000 anticipated in 2016-17. A total of \$146,692.80 in 2015 unprogrammed funds is available for allocation.

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 Second Action Year Plan.

NOTE: In reference to item no. 2 below under the "Other CDBG Requirements" section, the City of Oklahoma City began its 3-year ratio in the First Action Plan Year. The ratio period will cover the years 2015-16; 2016-17; and 2017-18 (70% of a 3 year average beginning in FY 2015-16 as year one).

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.

Total Program Income:	322,720
5. The amount of income from float-funded activities	0
not been included in a prior statement or plan	151,693
4. The amount of any grant funds returned to the line of credit for which the planned use has	
3. The amount of surplus funds from urban renewal settlements	0
to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year	
next program year and that has not yet been reprogrammed	171,027
1. The total amount of program income that will have been received before the start of the	

88

Other CDBG Requirements

1. The amount of urgent need activities

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.

80.00%

0

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

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

Unallocated 2015-16 HOME funds in the amount of \$32,904.60 are available to re-allocate. 2015-16 program income (January-July) is estimated at \$42,000. 2016-17 HOME program income of \$80,000 is anticipated. HOME funds from 2015-16 in the amount of \$19,206.21 have been recaptured.

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

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

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

The City, as the participating jurisdiction, will recoup all or a portion of the HOME assistance to the homebuyers, if the assisted housing is transferred voluntarily or involuntarily during the period of affordability based on the availability of net proceeds. Net proceeds are defined as the sales price minus superior loan repayment (other than HOME funds) and any closing costs. Only the direct subsidy provided to the homebuyer, i.e., down payment and closing cost assistance and/or the Annual Action Plan

difference between the fair market value of the property and a reduced sales price attributable to HOME funds, will be recouped pro-rata based on the forgivable loan terms and on the reduction during affordability period provided in the HOME regulations at 92.254(a)(5)(ii)(A)(2).

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

The City of Oklahoma City does <u>not</u> 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.

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

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

A complete copy of the current ESG policies and procedures manual is attached as an appendix.

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

The City works with numerous nonprofit social service providers through the Continuum of Care (CoC) program. The CoC Committee coordinates the City's homeless assistance programs and he development of the City's annual CoC grant application. The City conducts an annual Point-in-Time (PIT) count of the homeless in January of each year. Data gathered through this effort, coupled with consultation with local homeless service providers was used to develop the City's homeless strategy. While not the definitive measure to count the homeless population; this snapshot count provides

information about current trends, and helps to identify gaps in services and housing. Oklahoma City has focused on housing for individuals who are chronically homeless through funding from the HUD CoC competitive grant and a commitment of matching HOME funding. The City, through community partnerships has worked to create permanent supportive housing beds in its effort to eliminate homelessness.

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

ESG funds are awarded through an Open Solicitation process. The Continuum of Care Committee makes recommendations for funding. These recommendations are then presented to the Social Services Committee of the City Council for their recommendations before being presented to the City Council for final approval. All ESG funds will be allocated through this process to organizations providing housing assistance and services to the homeless

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

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

5. Describe performance standards for evaluating ESG.

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

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

Discussion

The City of Oklahoma City offers a "no wrong door" approach, with providers being well linked to available resources through networking connections gained via the Coalition To End Poverty. In addition to this, 211 is the information and referral agency which provides information about eligibility and referrals to service agencies. 211 conducts public awareness campaigns throughout the year with public service advertisements located on television, radio, on city buses and signage. People are linked to public benefits through provider agencies. All agencies have received training in helping people apply for benefits through Social Security and Medicaid. This training was conducted through the SSI/SSDI Outreach, Access and Recovery grant (SOAR).

In 2013, the City of Oklahoma City also joined the 100,000 Homes Campaign in an effort to move the most medically frail, chronically homeless individuals into permanent housing using a housing first approach. To accomplish this, members of the chronically homeless population are initially given a vulnerability index survey to determine their health issues. Those that are determined to be the most medically frail are prioritized for immediate placement into housing. A case management committee comprised of various service providers identifies a case manager to work with each individual. Which provider the case manager is affiliated with depends on the needs of the individual being housed.

Since joining the 100,000 Homes Campaign at the beginning of 2013, local non-profit service providers have collaborated to house over 750 chronically homeless individuals, exceeding their goal by more than 40%.

Attachments

Grantee Unique Appendices

2016-17 SECOND ANNUAL ACTION YEAR PLAN

Public Meeting #1 (2:00 p.m. January 7, 2016) Sunbeam Family Services 1100 NW 14th St Oklahoma City, OK 73106

Attendees: 36 (28 community members, 8 staff members)

Question: Please explain more about SNI

Staff responded with a short history of the program, and a summary of the program goals and objectives in addressing community need and incentivizing private investment in targeted neighborhoods.

Question: Does SNI include Economic Development?

Staff responded that economic development is encouraged through community partnerships in SNI neighborhoods but there is no budget for economic activities. Staff mentioned the new small business/microenterprise loan fund that could potentially apply in SNI areas.

Question: If someone is interested in Downpayment assistance, who should they contact?

Staff responded that interested persons should contact our community partners, NHS or CAA. It was noted that funds are available both within and outside the Neighborhood Revitalization Strategy Area (NRSA) and that applicants are required to complete a homebuyer education course.

Comment: Wanted to put in a plug for SNI. The City should continue to recognize the benefit in concentrating resources rather than piece milling.

Comment: Please make removal of dead trees through the tree removal program available to all areas in the NRSA, not just SNI.

Comment: When building sidewalks, focus on specific neighborhoods.

Comment: Continue focusing on housing rehab, infill development and focusing on neighborhoods.

Question: When will the proposed budget be presented and discussed? Staff responded that the public will be able to respond to allocation recommendations at the Citizens Committee meeting on February 16th and at the Neighborhood Conservation Committee on March 1st.

Comment: Another plug for SNI for their efforts in working with the schools. Recognizing public safety issues is critical. Sidewalks are a major factor. Do more if possible.

Comment: Please continue to fund public services and public facilities.

Comment: I work with the Oklahoma Youth Literacy Program. Focus is on after school tutoring for reading and math. The City should invest in kids, not just homes. Continue to focus SNI funding on schools.

Question: Are there vacant lots available for community gardens? Could this be an opportunity to partner with schools?

Staff responded that we would need to see a specific project proposal. OKC Beautiful has a community garden program already in place and they do partner with schools.

Question: Is there a process to seek or expand funding for literacy? Is additional money available for public and social services? Should interested persons notify the Citizen Participation Committees?

Staff responded that funding public services is difficult for a number of reasons, but the ongoing dependence on these funds in a time of declining resources is particularly problematic. The money cannot be given indefinitely and public service organizations must have a plan to remain sustainable after funding is depleted. Organizational capacity is important and performance measures must be met or the funding can be pulled. Demand for public service funding is huge and there is a 15% cap on these activities. Funded activities must be sustainable both operationally and financially. Working through the Citizens Committee is an acceptable approach for inquiring about funding.

Comment: LMI Housing inventory is low even if resources are available. We need more SROs for the aging and disabled.

Comment: There is increasing demand for emergency home repairs. We need more resources.

Comment: We are continuing to lose college graduates to Texas. We need more bungalow style housing and traditional style homes to grow the city core.

Comment: We represent Be The Change. We need more resources and there is a sense of urgency; specifically for street outreach for youth ages 14-24. Thanks to the City for help in creating a new drop-in center. Others are still needed. Job training and substance abuse counseling are also needed to provide the necessary supportive services. The support from the City has been instrumental in leveraging additional private support and partnerships. 267 unduplicated individuals were served last year by Be the Change. Resources are especially scarce in the South and Northeast quadrants of the city.

Comment: The Early Head Start program for kids 6 months to 3 years old is just starting up and there is a big push nationally to enroll children in Early Head Start Programs.

Question: Is there Embark funding available for more routes?

Staff responded that there is not program funding available at the present time for new routes. We have, however, continued to support the Share A Fare program with CDBG funds to provide free and discounted bus fares for seniors and the disabled. Covered shelters are being constructed in the SNI neighborhoods.

Question: There is an Association of Central Oklahoma Government (ACOG) meeting on transit next week on how to improve transit. Can Staff forward this information to today's participants?

Staff agreed to forward the information, and on January 8th provided an email to all attendees who left their contact information on the sign-in sheet.

Question: Are new or improved bicycle lanes on the Radar? I would like to see more. Cyclists would feel more comfortable.

Staff responded that although it is not a program within the Consolidated Plan, the City continues to add Bicycle lanes and improve safety for cyclists when possible.

Question: There are vacant and abandoned buildings on the south side too, not just in the northeast. Are there resources available for other parts of the City?

Staff responded that the City continues to work on the vacant and abandoned building problem. There are statutory and political limitations and no easy answers. The largest issue with vacant properties in the SNI seems to be the inability of occupants to obtain a clear title to their properties due to probate issues. Staff is continuing to work on the Vacant and Abandoned property issue city-wide.

2016-17 SECOND ANNUAL ACTION YEAR PLAN

Public Meeting #2 (6:00 p.m. January 12, 2016) Sunbeam Family Services 1100 NW 14th St Oklahoma City, OK 73106

Attendees: 20 (12 community members, 8 staff members)

Question: Are the owner-occupied rehab loans forgivable? What are the terms?

Staff responded that, No, the loans must be repaid. Typically they are low interest loans at 2% simple interest. The length of the loan and other terms are based upon the ability of the Borrower to repay. There is a forgivable loan program for seniors and the disabled. Also, the HEMP program for providing exterior maintenance on owner-occupied housing is a grant that does not have to be repaid.

Question: How does the SNI business façade program work?

Staff responded that SNI funds haven't really been used for facades. It has not been budgeted, because there haven't been requests. Staff advised that if there is someone in need of this service, they should contact us to inquire about the new Commercial District Revolving Loan Fund for small businesses and microenterprises.

Comment: Attendee commented that she is very happy and pleased with SNI, and the neighborhood wants a traditional neighborhood overlay to ensure that future projects are designed in context with the surrounding neighborhood.

Question: Are the other SNI neighborhoods fully encompassed? Classen Ten Penn is split down the middle. Part is eligible for SNI and the other part isn't.

Staff responded that Classen Ten Penn is unique in that it was subdivided because it is such a large neighborhood. The other two SNI neighborhoods have natural and geographical boundaries that are easily identifiable and practical, and they are much smaller neighborhoods.

Comment: The yearly SNI neighborhood grants for community projects are making a difference. They help us help ourselves through branding and murals. This resource is changing the neighborhood.

Question: I work with the Mustard Seed Development Corporation. There is lots of need in the 73114 zip code area. How does a neighborhood qualify as a future SNI designated neighborhood?

Staff responded that selecting the next SNI areas will be a challenging process. There are many neighborhoods that want to participate and the selection is expected to be largely based on potential, neighborhood need and demographics. It is expected that the next SNI neighborhoods will be identified in 2017, although the timeline is not yet in place. It is

anticipated that Classen's North Highland Parked will exit the program in June 2017, and the Classen Ten Penn and Culbertson's East Highland in June 2018. It is unknown how many neighborhoods will be selected for the next round. Staff advised contacting their Council Member to express interest, and to consider advocating for neighborhood programs with the intent of creating a designated target area if need can be documented.

Question: There is an abandoned school in our neighborhood that is currently occupied by homeless men and a sixteen year old. Can these funds be used to make the building safe? It is a hazard in its current condition.

Staff responded that they are aware of the problem at Gatewood, and that previous redevelopment proposals have fallen through. It was noted there is a Police Homeless Outreach team that we can dispatch to assist with the homeless issue. There is a significant problem with vacant and abandoned buildings in all areas of the city, and City leadership and Council are trying to address. Staff encouraged residents to contact the Action Center with concerns about code violations and safety issues if they exist at a particular property.

Comment: For people who need down payment assistance, CAA has another program that can sometimes be used when the City DPA funds are not available.

Question: Can the Citizen's Committee make recommendations to place more funding in rehab programs?

Staff responded that the CCCD meeting will be public and that the Committee can recommend changes to staff recommendations prior to our presentation at the Neighborhood Conservation Committee meeting.

Question: All of the DPA in the NRSA is depleted. Can the additional money in the SNI budget be used to give more persons DPA?

Staff responded there is no budgeted money within SNI that can be used for DPA. However, the question was clarified and staff reported that there was previously a requirement to spend 80% of the DPA funding within the NRSA, so the remaining 20% for use in other areas of the City was quickly depleted. There is still a focus on spending money within the NRSA, but this year's contract with the DPA providers states that as of May 1st at the end of the contract year, the remaining funds will no longer be area restricted and can be spent throughout the designated DPA area. It is anticipated that the majority of requests will still be within the NRSA because of the lower market values and the borrower's need to qualify based on income.

Comment: It is hard to find homes in Classen Ten Penn that can pass the required inspections for DPA assistance. There is a lack of inventory that meets the minimum criteria.

Question: What changes will be made from the last Action Plan?

Staff responded that we do not anticipate significant changes from last year since funding is expected to remain about level. Most of the significant changes were considered during the 5-

year Consolidated Plan process last year. The Citizen's Committee and the Neighborhood Conservation Committee retain the ability to respond to feedback received from the public and from Council; however, at this time we are not proposing or aware of any intent to make sweeping changes.

Question: If a CHDO moved into another area, would the City provide more money for development?

Staff responded that there are currently sufficient funds in the mandatory 15% CHDO set-aside required by the HOME grant to assist new projects without reallocating funds from other program activities.