

The City of Oklahoma City

2024-2025 Fifth Action Year

Strategic Plan for Year 2024-2025

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



Strategic Plan Submission Date: July 5, 2024



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). As such, the City receives annual formula Community Development Block Grant (CDBG), Home Investments Partnership Program (HOME), Emergency Solutions Grant (ESG) and Housing Opportunities for Persons with AIDs (HOPWA) grants. As a condition of funding, the City is required to prepare a Consolidated Plan (Plan) every five (5) years for submittal to HUD. The purpose is to provide an updated community-based analysis of current demographic, economic, and public policy trends, and reassessment of the needs of low and moderate income populations relating to housing, shelter, public service, and economic development opportunities. This analysis, along with input received during a comprehensive citizen and stakeholder consultation process, forms the foundation of the City's five (5) year strategic plan for addressing unmet community needs. Each year of the five (5) year strategy, the City must prepare an annual Action Plan to inform citizens and HUD of planned activities. At the end of each fiscal year, the City must prepare a Consolidated Annual Performance Evaluation Report (CAPER) that provides an assessment of annual performance in the context of the five (5) year Consolidated Plan and Annual Action Plan.

The CDBG program goals are to develop viable urban communities by providing safe and decent housing, a suitable living environment, and expanding economic opportunities for low and moderate income persons. Regulations require that each activity undertaken must meet one of three (3) National Objectives: Benefit people with low and moderate incomes, Aid in the prevention or elimination of slums and blight, or Meet an urgent need (such as earthquake, flood, or tornado relief).

The HOME program supports the development of affordable housing, expands capacity of affordable housing developers, and leverages private sector investment.

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.

HOPWA is the only Federal program dedicated to addressing the housing needs of persons living with HIV/AIDS and their families.

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

2. Summarize the objectives and outcomes identified in the Plan

The 2024-25 Fifth Annual Action Year Plan addresses housing and community development needs, and provides support to homeless persons and special populations in Oklahoma City. In this Plan, The City continues our approach of concentrating resources strategically within the Strong Neighborhood Initiative (SNI) areas to promote a holistic approach to neighborhood revitalization. In the Fifth Action Year Plan, The City continues to emphasize affordable housing, with specific emphasis on the Neighborhood Revitalization Strategy Area (NRSA). Special consideration will also be given to supporting projects in LMI census areas within the Opportunity Zones (see Appendices 5b and 5c).

HOME funding has been allocated for down payment assistance to low to moderate income homebuyers, affordable housing construction/rehabilitation, and rehabilitation of owner-occupied homes. CDBG funds support public service activities which continue to be a priority of the community. Funding has been allocated for free and reduced bus and taxi fares for special populations, securing abandoned houses, after school programming, hazardous tree removal, healthcare for homeless, advocacy for children in foster care, and public education. Several public facilities projects are underway and/or in various steps of planning, including new sidewalks, trail connections, a community plaza, and park improvements in SNI neighborhoods. Continued investment in public facilities projects remains a focus in this Fifth Action Year Plan; most notably, \$200,000 in CDBG funds are allocated to support construction of a new community center. \$383,025 is being made available for future public facilities proposals.

The City of Oklahoma City continues to support economic development and slum/blight removal activities using CDBG funding. CDBG funded activities include small business training; support for the Urban Renewal Authority (to include slum and blight removal, urban renewal completion,). A pest inspection and treatment program was established in FY 2022-23 to remediate severe infestation for HOME-assisted Whole House Rehabilitation Program activities prior to construction. \$22,400 for that program is being allocated from previously unobligated funds in the new program year. CDBG funds continue to support Fair Housing and planning activities.

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 Rent, Mortgage, and Utilities assistance, emergency and permanent housing and supportive services to persons with HIV/AIDS.

3. Evaluation of past performance

The City's 2020-24 Consolidated Plan responded to community **housing goals** by providing funding and engaging in program activities that included support for nonprofit and for-profit housing developers to rehabilitate and construct new affordable housing; support for Community Housing Development Organizations to rehabilitate and construct new affordable housing; support for the Oklahoma City Housing Authority to modernize public housing units; funding to assist with emergency repairs of housing for low-income households; support for down payment and closing cost assistance to expand homeownership opportunities for low- to moderate income households; and, funding for activities that support the City's housing rehab program, and housing and services for persons with HIV/AIDS. Activities undertaken in the first four years of the Consolidated Plan addressed these goals, and are on target to meet projected outcomes; albeit somewhat slower than projected.

The goal of providing a **suitable living environment** was addressed in the 5-year Consolidated Plan, and the first four Action Year strategies by continuing ongoing programs that addressed specific community needs. The 2024-25 Fifth Year Action Plan strategy calls for continued support for homeless services through the Emergency Solutions Grant Program; the Continuum of Care Program; discounted taxi coupons for elderly, disabled and sight impaired persons under the City's Share-A-Fare program; bus passes and discounted taxi service for homeless individuals and families; local funding of capacity building activities for neighborhood organizations and CDBG funding to provide neighborhood improvements; activities to address vacant and abandoned housing; and, removal of slum and blight conditions in low-income areas. These programs are much needed and continue to expend funds timely.

In addition, the City of Oklahoma City made progress in attaining its goals for **expanding economic opportunities**. The City's Consolidated Plan, and first four Annual Action Year Strategies called for engaging in program activities that provide technical assistance to small businesses in obtaining financing and investing Section 108 Loan Guarantee funds in businesses to create jobs for low and moderate income persons. A Section 108 loan application for renovation of the historic First National Building was submitted to, and approved by HUD in FY 2021-22. Repayments began during the Third Action Year Plan, and job creation goals were substantially met in the Fourth and Fifth Action Plan years.

4. Summary of Citizen Participation Process and consultation process

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

The consultation process for this Plan provided several opportunities for residents, service providers, citizen's committees, and others to contribute. On December 22, 2023, the City published a Notice of

Public Meetings for two (2) community input sessions held at local libraries. Meetings were held in-person for the first time since the pandemic. The meetings were held in January 2024 with one meeting during the afternoon to accommodate persons working evening hours. A total of fifteen (15) citizens and representatives of local organizations and service providers participated in these meetings. Instructions for offering subsequent feedback and comments were provided. Six (6) Community Development staff members were present at the January 23rd meeting and three (3) at the January 25th meeting to assist with questions and comments.

Over the last 5 years there has been an increasingly high community focus on persons experiencing homelessness, which continues today. In 2019, the Mayor initiated a Homelessness Task Force and the City hired Analytic Insight to assess existing conditions, and to develop a Comprehensive Strategy. Stakeholders were interviewed, public planning sessions were held, and focus groups convened to examine current systems. A Public Forum was held on December 16th, 2020 to vet community concerns. In September 2021, City Council accepted a report prepared by Analytic Insight detailing 24 strategies to enhance delivery of homeless services. Since then, Clutch Consulting has been engaged to work with the City to develop an implementation strategy and the City formed and filled a new position to coordinate the effort. The Oklahoma City Key to Home Partnership was subsequently created as a collaborative team of service providers, local government, community leaders and funders with a mission to prevent and end homelessness. As one component, the Key to Home Partnership piloted an encampment-rehousing program in 2022. This is an intentional, structured effort to offer individuals in established encampments safe and dignified housing solutions prior to closing an area or reactivating it for general use. With 90% of the participants in the pilot program moving into housing with supportive services, the program is expanding. The goal is to provide housing and wraparound services for 500 unsheltered people by 2025.

5. Summary of public comments

Citizen input received from the public meetings and from the CCCD meeting described above related to several different topics. Questions and comments are itemized in the attached Appendix 2. The most common were a desire to pursue an expansion of the NRSA, additional funding for affordable housing; specifically for those persons who are presently experiencing homelessness, more flexible uses of Downpayment Assistance (DPA) for costs such as interest rate buydowns and payment of points, and an increase in the DPA subsidy to accommodate significant increases in average sale prices and construction costs. Increased funding for public service programs remains a need, and increased funding and easier access to services provided through the housing Emergency Repair Program were requested.

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

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

All comments were received and evaluated. Those not accepted generally proposed activities that did not meet the regulatory requirements and/or could not be adequately funded with available resources. All public feedback was given due consideration, although not every requested activity could be supported. In general, in the Fifth Year Action Plan, overall funding was insufficient to address all the requests, and the public service cap also limited some potential increases that might have been otherwise considered.

7. Summary

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 FY 2024-25 Fifth Year Action Plan. Although expressed needs continue to exceed available resources, citizen feedback obtained from community input meetings is used to inform the City's annual goals and objectives to the greatest extent possible. Public service activities continue to be a high priority with limited resources available.

A minor or substantial amendment to this Annual Action Year Plan may be required, as the City adapts to changing needs and priorities within the program year. A substantial amendment to an Annual Action Year Plan is defined as an amendment that a.) Changes the priorities in the 5-Year Strategy; b.) Funds a new activity not described in the Action Plan; or c.) Increases funding allocated to an activity by more than 25%. In the event an amendment is required, the City will follow the terms and conditions of its Citizen Participation Plan to allow for public comment.

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.

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

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

Table 1 – Responsible Agencies

Narrative

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

Consolidated Plan Public Contact Information

For questions and comments regarding this Plan, please contact Chris Varga, Housing & Community Development Manager, or Randy Stallings, Sr. Planner at The City of Oklahoma City, 420 W. Main Street, Ste. 920, Oklahoma City, OK 73102.

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

1. Introduction

The lead agency for overseeing the development of the Consolidated Plan and for administering programs covered by the Plan is the Housing & Community Development Division of the City of Oklahoma City Planning Department. The City also relies on the Oklahoma City Continuum of Care (CoC) Board which is comprised of service providers, local government, community leaders and funders who provide guidance on allocation and expenditure of ESG, CoC, and HOPWA funds. Citizen input on allocations and expenditures of federal grant funds is received from the Citizens Committee for Community Development (CCCD), a formal citizens advisory committee.

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

The City routinely communicates with the Oklahoma City Housing Authority (OCHA) to understand their programs and needs. The City continues to provide them with limited CDBG funding each year to rehabilitate approximately twelve (12) public housing units as indicated within our Action Plan. In addition, this year’s plan continues to reserve an allocation of HOME funding for the Creston Park Neighborhood redevelopment project that OCHA should be initiating in 2024. The City is also a current partner and co-applicant with OCHA in its recently awarded Choice Neighborhoods Initiative Planning Grant for development of a comprehensive Transformation Plan for the Will Rogers Courts housing complex and the surrounding Stockyards/Rotary Park neighborhood. Further, OCHA has been designated as the operator of our MAPS 4 funding earmarked for housing to decrease homelessness; a \$55.7M award funded through a voter approved sales tax. In this role, OCHA will act to administer funding, project management and oversight, and will be the owner and asset manager of properties. OCHA will be working with local service organizations to provide supportive services, and with the City to both rehabilitate or replace some of OCHA’s existing housing stock, as well as develop new affordable housing for our community.

The City interacts routinely with the Oklahoma Housing Finance Authority (OHFA) as we direct clients to Section 8 programs and coordinate data sharing. In the past City grant funds have provided additional funding to support selected LIHTC projects. Also, periodic meetings are held with representatives of OHFA, OCHA, the City, and the Alliance for Economic Development to discuss program issues, potential funding sources, and affordable housing concerns. Both OHFA and OCHA representatives were included in development of the City’s Affordable housing study and continue to be involved in discussions relating to the City’s e Housing Affordability Implementation Plan that is underway.

The City collaborates with our Continuum of Care (CoC) subrecipients to provide various types of assisted housing. Some homeless service providers in the CoC specialize in assisting individuals with mental health

concerns. Case managers with these organizations receive SSI/SSDI Outreach, Access, and Recovery (SOAR) training and connect eligible clients to appropriate SSI/SSDI benefits. All the community mental health centers in the City collaborate with CoC housing providers and two of the mental health centers also provide housing and case management to CoC recipients. This year, the City restructured the Continuum of Care Board (aka The Key To Home Board) to expand it in size and in scope to be more inclusive of service providers and potential funders that would support homeless services.

In 2019, the Mayor established a new Task Force on Homelessness to examine and address community needs. Task Force members represent a variety of social service agencies including mental health providers, the housing authority, city program staff, and philanthropic funding agencies. A consultant was hired to examine our local assets and gaps in providing homelessness services to develop a Comprehensive Strategy to address homelessness. This strategic plan was presented to and accepted by City Council in September 2021. Public meetings were included as part of this effort as were a series of workshops held with stakeholders to discuss issues in February 2020. Clutch Consulting group has been engaged to coordinate with stakeholders and develop an implementation strategy for the plan recommendations, and those efforts are ongoing. Additionally, the City created a new position to coordinate implementation strategy efforts. New programs have recently been initiated to strengthen outreach capacity, and an initiative to decommission camps by moving all residents of a selected camp directly into housing is underway. The Mental Health Association Oklahoma, the Homeless Alliance, and City Care are partners in providing an enhanced outreach component. A program goal is to house 500 persons currently living on the streets within the next few years.

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

The City is the lead agency for the Oklahoma City Continuum of Care (CoC). This year the City has restructured the CoC governing Board to be larger and more inclusive, and to expand the scope of its conversation concerning the needs of, and programs to address, homelessness. The City continues to emphasize Coordinated Entry through the Key to HOME program, a collaborative initiative that combines the efforts of over forty (40) government, faith-based, and non-profit organizations to address homelessness. The CoC routinely realizes a housing retention rate of over 85%. Housing homeless veterans is an emphasis of the program, and the CoC coordinates with the VA for VASH vouchers and case management, and with Community Service Council as the local provider of Supportive Services for Veteran's Families (SSVF).

The City and our service providers have been using a "housing first" approach for our chronically homeless and homeless veteran populations since 2013. We developed a need-based coordinated entry program for both populations. Of those placed in permanent housing, the City has realized a client retention rate between 80-90%. While the City has permanent housing programs that focus on assisting homeless families, the most extensive services are provided via ESG through prevention and re-housing assistance.

Families are assessed through the same Coordinated Entry System used for veterans and the chronically homeless. ESG and CoC staff assess clients and Coordinated Entry refers them to the provider that can meet their needs generally based on assessment scores. The services provided through ESG are those most often required by homeless families, and generally make supportive housing a necessity. If an individual or family demonstrates they are at imminent risk of homelessness, ESG agencies can address immediate concerns and provide case management to prevent a loss of housing.

Homeless youth may also access housing and services through the Coordinated Entry System and are prioritized for housing based upon their demonstrated level of need. In the last 5 years, the CoC has seen rapid expansion in services. The Fourth Year Action Plan included a FY 2022-23 allocation of \$1 million to SISU from the CDBG Public Facilities program to assist in the expansion of an emergency shelter and drop-in center for homeless youth. Construction is completed and these funds were fully expended during the FY 2023-24 Fourth Action Year Plan. The City was also the recipient of the Youth Homelessness Demonstration Program (YHDP) which began at the end of 2022. This added new drop in, host home, diversion, permanent supportive housing, and transitional + rapid rehousing projects to the CoC's collection of youth services.

Over the last 5 years, the CoC has seen significant improvements in efficiency of outreach and shelter services, Point In Time (PIT) planning, and data collection; as well as in housing and case management services for all subpopulations. This can be attributed to the presence of CoC staff on service workgroups and committees. The City Planning staff and the Homeless Alliance organize and conduct the annual PIT count of the Homeless each January with the assistance of recruited volunteers. This year the program gained efficiencies by using field tablets to input information on survey participants. The PIT information is used in the annual HUD CoC competition. The information obtained from the PIT count is used to establish need and identify current trends, including people who are chronically homeless and families with children. The PIT count conducted in January 2024 reflects an increase over 26% in total number of persons experiencing homeless, albeit a small decrease in the unsheltered count. The 2024 count was conducted on January 25, 2024. The final report is nearing completion.

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

The geographic area served by ESG is the same as the Oklahoma City Continuum of Care (CoC) ESG funded agencies are considered members of the CoC and several CoC subrecipients also receive ESG funding and conduct ESG eligible activities. As the CoC lead agency, the Oklahoma City Planning Department consults with ESG funded agencies to develop performance standards that serve as a measure for evaluating the outcomes of ESG assisted projects. The lead agency also collaborates with CoC and ESG funded agencies to develop local policies related to other ESG elements such as case management. The CoC Allocations Committee ranks/determines funding allocations and CoC staff monitor financial and programmatic elements of both CoC and ESG funded projects. CoC staff provides feedback on strengths and weaknesses as well as provides information to the Allocations Committee so they may determine funding allocations.

Homeless Management Information System (HMIS) policies and procedures are developed by a statewide HMIS workgroup. Membership of the workgroup is comprised of representatives from the CoC lead agency, the HMIS lead agency, and CoC and ESG subrecipient organizations. Policies and procedures are developed to comply with HUD data requirements as well as other federal and local requirements, and to meet the data needs of the CoC. HMIS funding is provided by the City of Oklahoma City, a Continuum of Care program grant, and other funding sources.

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

1	Agency/Group/Organization	Metropolitan Fair Housing Council
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Fair Housing Enforcement
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email Consultation and Fair Housing Survey participation. Identification of issues related to Fair Housing will inform this Consolidated Plan and future program activities.
2	Agency/Group/Organization	OKLAHOMA CITY HOUSING AUTHORITY
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Needs - Veterans Non-Homeless Special Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Oklahoma City Housing Authority was consulted directly by City Staff to gauge current needs for public housing and Section 8 tenants. Information was provided by OCHA about current inventories, waiting lists, capital needs, veterans' benefits, anticipated funding over the next five (5) years, and anticipated gaps in resources. The City continues to provide CDBG funding to support the rehabilitation of about twelve (12) public housing units annually to enhance the quality of public housing
3	Agency/Group/Organization	Association of Central Oklahoma Governments
	Agency/Group/Organization Type	Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Oklahoma City continues to partner with the Association of Central Oklahoma Governments (ACOG) in support of economic development activities identified in the regional Comprehensive Economic Development Strategy (CEDs). ACOG serves as the regional Metropolitan Planning Organization (MPO). ACOG reviewed the priority needs and the proposed funding for the FY 2020-2024 5-year Consolidated Plan, and the subsequent Annual Action Plan allocations during the 5-year plan period.
4	Agency/Group/Organization	COMMUNITY ACTION AGENCY OF OKLAHOMA/CANADIAN COUNTIES
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Health Services-Abuse and Addiction Recovery
	What section of the Plan was addressed by Consultation?	Homelessness Needs - Veterans Non-Homeless Special Needs Economic Development

<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The Community Action Agency (CAA) was consulted for the homeless housing needs assessment and identification of social services gaps. CAA provides child development services, treatment for substance abuse, economic development loans for small businesses, homebuyer assistance, and emergency repair/weatherization activities for homeowners. CAA is provided with CDBG funding to support emergency home repairs and small business services.</p>
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Table 2 – Agencies, groups, organizations who participated:

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

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

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

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

Narrative

The City of Oklahoma City maintains an ongoing dialogue with local non-profit and for-profit housing providers and developers to gauge housing needs in the metropolitan area. Solicitations for development proposals are drafted based upon current housing needs and community goals such as mixed income housing, deconcentration of poverty, infill development, and minimal design standards. Housing needs for very low-income families are identified through continuing discourse with the Oklahoma City Housing Authority. Current data and market trends in multifamily and commercial development are monitored through analysis of the Price Edwards & Company, Oklahoma City market studies which are released annually. A new housing market study, affordable housing study, and an analysis of impediments to fair housing were completed in FY 2019-20 to support work on the 2020-2024 Five Year Consolidated Plan.

Two (2) public meetings were held to discuss the FY 2024-2025 Fifth Action Year Plan in January 2024 at local libraries. The meetings were held in person. Participation in these meetings by local service providers and neighborhood associations included representatives from Tinker Federal Credit Union, Embark Transportation office, The Alliance for Economic Development, Positively Paseo, Community Action Agency, and Unlimited Vision. Input received during these public meetings are provided in the appendices of this report (Appendix 2).

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

Collaborative efforts to promote economic growth are sometimes more difficult to achieve due to the competition for sales tax dollars between local communities. The funding of municipal services in Oklahoma relies primarily on sales tax receipts and, thus, the City of Oklahoma City often finds itself in direct competition with suburban municipalities for new businesses.

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation.

Summarize citizen participation process and how it impacted goal-setting.

A Notice of Public Meetings was published in *The Oklahoman* on December 22, 2023 soliciting participation and feedback for the FY 2024-25 Fifth Action Year Plan. In addition, local stakeholders, non-profit organizations, and other interested parties were notified of the public meetings via email on January 9, 2024. Meetings were held at local libraries at 3:00 p.m. on January 23, 2024 and at 6:00 p.m. on January 25, 2024. Additional opportunities for public comment were provided at the Citizens Committee for Community Development meeting held at 3:30 p.m. on June 4, 2024. A final public hearing was held at the regular City Council meeting at 8:30 a.m. on July 2, 2024.

The citizen participation process and summary of feedback has been fully described in the Executive Summary, and due to character space restrictions cannot be duplicated here. Feedback received at the public meetings was used in conjunction with quantitative data and evaluation of current programs to establish priority needs for this Fifth Action Year Plan. Where possible, funding allocations and strategic goals were identified based on the most urgent community needs, and in support of goals and objectives identified in the 5-year Consolidated Plan. Staff will continue to evaluate needs throughout the program year. Funding allocations will be adjusted as needed to promote a strategic and targeted allocation of resources, with the intent of creating a noticeable and sustainable community benefit.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Meetings	Non-targeted/broad community Non-Profit Organizations and Service Providers	Two (2) public meetings were held for public comment and feedback on January 23, and January 25, 2024. The session on January 23, 2023 was scheduled at 3:00 p.m. to accommodate citizens working evening hours, and to provide an alternative time for representatives from local non-profits and	A summary of community feedback is attached in the appendices of this report (Appendix 2).	All comments and 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 response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
			service providers during normal business hours. Fifteen (15) community members attended the two sessions. Up to Six (6) City Community Development Staff members were present at each meeting.			
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 May 24, 2024 and printed on May 31 2024 in the legal notices.	No additional comments were received in response to the published request for public comment about proposed activities.	Not Applicable	
3	Public Meeting	Non-targeted/broad community	In addition to the two (2) public meetings conducted for citizen input, the proposed Fifth Action Year Plan was also presented at a public meeting of the Citizens Committee for Community Development on June 4, 2024. The Plan as recommended by the CCCD was presented during a final public hearing at City Council on July 2, 2024.	A summary of community and committee members feedback is attached in the appendices of this report (Appendix 2).	Not Applicable	

Table 3 – Citizen Participation Outreach

Expected Resources

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

Introduction

Fifth program year allocations, funds carried forward from prior program years, and program income estimates are based upon the most recent data available at the time of report submission. Final allocations of funding from the U.S. Department of Housing and Urban Development (HUD) were announced on May 7, 2024 and communicated via email by HUD. The CDBG allocation of \$5,055,205 represents a 3.00% increase from FY 2023. The HOME program received \$2,236,659; a noteworthy decrease of \$406,007 below last year's funding (15.36%). ESG funding of \$431,433 remains near the FY23 funding level, and HOPWA received an allocation increase of 3.14% to \$1,399,461.

The City's most recent Section 108 funded project was in 2012 for a loan transaction to partially fund the renovation of the historic First National Center. Job creation requirements under that loan agreement were recognized during the FY 2022 and FY 2023 Action Year Plans. If additional opportunities materialize during the term of this Consolidated Plan, Section 108 Loan Guarantee applications may be submitted to further the City's ongoing economic development initiatives.

Supplemental HOME ARP funding provided in response to the COVID-19 pandemic in prior years will be carried forward. ESG-CV and HOPWA-CV funding have been expended. Guidance received from HUD requires that all CV and ARP funding be received, managed, and allocated under the FY19 CARES ACT Substantial Amendment. **Resources allocated in this Plan are funded solely through regular formula grant funding allocations;** however, it should be noted that some duplication may exist in beneficiary

projections, primarily in assistance to the homeless and supportive services.

Anticipated Resources (exclusive of CV, ARPA, and ARP allocations)

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	*Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	5,055,205	0	\$2,850,016	7,905,221	7,905,221	Prior year resources include 2023-24 funds obligated/under contract and distribution of funds reallocated and recaptured. Amount available remainder of ConPlan = FY24 available funds since this is last year of the ConPlan). *Please note that any CDBG Program income received in FY 2023-24 is included in the prior year resources column as unobligated funds available for allocation.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	2,236,659	0	7,747,023	9,983,682	9,983,682	Prior year resources include funds carried forward from prior program years of \$7,721,924. Expected amount available for remainder of ConPlan = FY24 funds available since this is last year of the ConPlan. *Please note that HOME Program income received in FY 2022-23 in the amount of \$49,359.18 is included in the prior year resources column as unobligated funds available for allocation.
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	1,399,461	213,000	0	1,612,461	1,612,461	Expected amount available for remainder of ConPlan = FY24 funds available since this is last year of the ConPlan..

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	*Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	431,333	0	0	431,333	431,333	Expected amount available remainder of ConPlan = FY24 funds available since this is last year of the ConPlan.

Table 4 - Expected Resources – Priority Table

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

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

The City has a CHDO set-aside that includes the 15% CHDO statutory minimum of HOME funds to be granted or loaned to Community Housing Development Organizations (CHDOs) for new home construction and rehabilitation/sale activities. In this Fifth Action Year Plan, The City has chosen to increase the CHDO capacity well beyond the minimum 15% set-aside to \$2,632,737. This includes the statutory 15% (\$335,499) plus an additional \$459,316 from unobligated FY 2023 funds and \$1,837,923 in obligated funds carried forward from prior program years. CHDOs are encouraged to utilize private bank financing along with CHDO HOME funds (some provided as grants and some as loans) in providing affordable housing. Proposals for new projects are generally accepted when the CHDO has completed all previously funded projects. The City facilitates the transfer at no cost, of Oklahoma County owned vacant lots when available, to nonprofit organizations for the construction of affordable housing. The lots are provided to the City through an agreement with Oklahoma County.

The City also provides local funding (general funds- Social Services Grants,) to agencies that provide services to the homeless. Match for ESG programs is required to be generated by the service providers who utilize these funds. Federal funds provided by HUD are utilized in several ways to leverage public and private resources. The City’s down payment and closing cost assistance program supports the achievement of home ownership and has proved effective in creating significant interest among private lenders. During the 2022-2023 reporting period, the City leveraged its Down Payment Assistance (DPA) program funds with private financial institution mortgage investments totaling \$1,912,767. The use of

DPA in the 2023-24 program year has increased, despite an increase in housing costs and significant increases in mortgage rates which make housing less accessible to low and moderate- income families. The new allocation for DPA in this Fifth Year Action Plan includes an increase of \$800,000 over last year's budget.

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. In past years, OHFA has provided bonus points for applications that receive a minimum level of funding support from the local community. At present no bonus points are awarded for local support, so funds have not been specifically allocated for this purpose in the recent Action Plans. Developers may apply for funding in response to a Request for Proposals to develop affordable housing that is issued when sufficient HOME funds exist; such RFP was made available in the FY 2023 Fourth Action Plan year, and is expected to be reissued early in the Fifth Action Plan Year.

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

The Oklahoma City Urban Renewal Authority (OCURA) still owns much property in the northeast area of the city and seeks to develop many of their sites with mixed-income housing projects. Additionally, OCURA still owns numerous single infill lots and has an open solicitation for persons to develop housing; those lots are offered at a minimal sale price. Beyond this, OCURA will continue the redevelopment of closeout areas under the agreements with HUD through eligible program activities that include acquisition, disposition, relocation, clearance, brownfields remediation, and urban renewal completion. HUD designated Urban Renewal areas include Medical Center R-20, Central Business District 1A R-30, and John F. Kennedy R-35. In addition, OCURA will redevelop locally designated low and moderate income urban renewal areas that include Harrison Walnut, Cultural District and North Downtown.

The City owns 105 residential lots on the north side of Northwest 10th Street between Ellison Avenue to the east, and Virginia Avenue to the west. The eastern thirty-six (36) lots between Blackwelder and Ellison Avenues were offered in a Request for Proposals (RFP) released on March 25, 2015 to solicit project proposals for residential, commercial and/or mixed-use development on these sites. The selected developer defaulted on the Development Agreement and the lots were returned to the City in May 2019. Efforts are on-going to identify a suitable development project for this site; some percentage of affordable housing is anticipated if housing is developed. The lots made available for a project is expected to include the additional sixty-nine (69) lots between Blackwelder and Virginia Avenue to the west. A

development timeline is presently unknown.

Discussion

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

Annual Goals and Objectives

Goal Descriptions

AP-20 Annual Goals and Objectives

1	Goal Name	Affordable Housing Construction and Development
	Goal Description	<p>CDBG funds in the amount of \$168,275 in obligated/unspent funds are carried forward from FY 2023 to support infrastructure development on Walnut Street. In addition, \$100,000 in FY 2024-25 Entitlement funds are provided to Walnut Street for a total budget of \$268,275.</p> <p>HOME funds are allocated for several projects. A Request for Proposals (RFP) is expected to be issued for new affordable housing under the HOME Affordable Housing Development Program. It is estimated that the future RFP will result in development of approximately 75 units in future program years. Available funding includes \$1,757,795 reallocation of projected unobligated funds from prior program years and \$627,494. in FY 2024-25 funding for a total allocation of \$2,385,290 to be reserved for housing projects. A portion of the funds is expected to be reserved for housing projects in the SNI areas.</p> <p>Funds in the amount of \$660,000 are expected to be obligated to Hillcrest Green Apartments in the Fifth Action Plan Year in support of a 43-unit LIHTC senior housing development. These funds are carried allocated for FY 2024-25. Funds in the amount of \$254,729 have been allocated to Progress OKC. This includes \$4,729.01 previously obligated and carried forward from FY 2023-24, and a proposed FY24 allocation of \$250,000 for construction and sale of two additional SF homes for Low-moderate income buyers. Progress OKC will provide a total of four (4) single family homes for sale to LM buyers during the program year. \$800,000 in unobligated funds has been carried forward from FY 2023-24 and reallocated for Creston Park Phase I. The Creston Park project is expected to provide 170 assisted units in 2025. An allocation of \$1.2 million is projected to be allocated to the OCHA Vita Nova project to support 75 units of supportive housing in the FY24 Fifth Action Plan Year. Unallocated CHDO funds in the amount of \$1,837,923 will be carried forward from FY 2023-24 unobligated funds. An additional \$459,316 will be provided from previously unobligated funds. The activity will also be funded with the statutory 15% setaside of \$335,499 for a total Unallocated CHDO budget of \$2,632,737. The JPNA CHDO will carry forward \$47,372.70 in FY 2023-24 obligated/unspent funds. The Paseo CHDO will carry forward \$755,550 in FY 2023-24 obligated/unspent funds. The Neighborhood Housing Services CHDO was allocated \$340,000 from FY 2023-24 funds in April of 2024; these funds will carry forward to the Fifth Action Year Plan</p>

2	Goal Name	Affordable Housing Retention and Rehabilitation
	Goal Description	<p>A total budget of \$750,000 in HOME funding is provided from re-allocation of unobligated FY 2023-24 funds for the Whole house Rehabilitation Program to rehab an estimated ten (10) homes for low to moderate income households.</p> <p>CDBG funds support multiple housing retention programs. \$24,000 is allocated from previously unobligated funds for the Pest Inspection and Treatment Program which assists infested units that are served under the HOME program Whole House Rehabilitation Program. The City's Housing Exterior Maintenance Program is allocated \$1.2 million. This amount is inclusive of a new FY 2024-25 allocation of \$580,000, an allocation of \$100,000 from unobligated FY 2023-24 funds, and \$520,000 unobligated/unspent funds carried forward from FY 2023-24. A separate allocation of \$675,000 for program delivery costs is also made from FY 2024-25 new entitlement funds to support costs of inspections, work write ups, bid administration, etc. related to projects. An estimated forty-eight (48) households will be served.</p> <p>\$235,000 is provided to OCHA from a reallocation of unobligated FY 2023-24 CDBG funds for the rehabilitation of approximately twelve (12) public housing units. \$600,000 is allocated from FY 2024-25 entitlement funds to the City's Emergency Repair Program to assist approximately forty-five (45) low to moderate income homeowners. .</p>
3	Goal Name	Homebuyer Financial Assistance
	Goal Description	HOME funds in the amount of \$1,042,574 will be used to assist approximately fifty (50) low to moderate income homebuyers. This includes \$242,574 in FY 2023-24 obligated/unspent funds and \$800,000 in new FY 2024-25 entitlement funds.
4	Goal Name	Elimination of Slum and Blight
	Goal Description	CDBG funds in the amount of \$788,880 have been allocated from FY 2024-25 entitlement funds to the Oklahoma City Urban Renewal Authority (OCURA) to assist with urban renewal completions, property maintenance and disposition. \$250,000 is made available for spot blight thru the City's Abandoned Buildings Program to secure vacant and abandoned properties. Of this amount, \$150,000 is allocated from obligated/unspent funds and \$100,000 is reallocated from previously unobligated funds.

5	Goal Name	General Public Services-CDBG
	Goal Description	CDBG funds are used to support multiple public service activities. A significant allocation of \$420,000 is provided from FY 2024-25 entitlement funds to support public service activities in our SNI neighborhoods. This program provides several different services, including but not limited to neighborhood capacity building, youth services and after-school programs, hazardous tree removals and summer youth programs. CDBG funds in the amount of \$105,000 are allocated to COTPA from FY 2024-25 entitlement funds to provide discounted bus and taxi fares, and courier services to special populations. \$65,000 is allocated from FY 2024-25 entitlement funds to Community Health Centers (CHCI) to provide healthcare for the homeless. \$40,000 is provided to CASA from FY 2024-25 entitlement for child advocacy services within the foster care system.
6	Goal Name	Public Facilities and Infrastructure
	Goal Description	<p>CDBG funds are allocated for the support of various public facilities activities.</p> <p>An allocation of \$200,000 from unobligated/unspent funds is provided to Alpha Community Foundation to support construction of the Garden Oaks Community Center.</p> <p>Funds in the amount of \$1.2 million are allocated for SNI. This allocation includes \$338,284 in obligated funds carried forward from FY 2023-24, \$447,954 reallocation from previously unobligated/unspent funds and \$413,762 in new FY 2024-25 entitlement funds. These funds will support neighborhood grant projects, tree plantings, park improvements, Capitol Hill Plaza construction, alley improvements, a trail connection, and new sidewalks in the Capitol Hill and Metro Park neighborhoods.</p> <p>An allocation of \$383,025 is allocated for a future undefined PF project(s). This funding includes \$365,003 from previously unobligated FY 2023-24 funds and \$18,022 from new FY 2024-25 entitlement funds. These funds may be made available under an open solicitation for eligible projects, or allocated at the discretion of City HCD Staff for eligible PF activities.</p>
7	Goal Name	Economic Development
	Goal Description	CDBG funds in the amount of \$40,000 have been allocated to the Community Action Agency from FY 2024-25 new entitlement funds for small businesses services. \$100,000 from previously unobligated funds is allocated for a Section 108 loan contingency funds to hedge the City’s risk in the event that loan repayments are insufficient to timely remit scheduled payments to HUD. \$300,000 is provided to NewView Oklahoma in support of a waterline extension which will assist in retention of 100 jobs. This funding includes \$100,000 from previously unallocated FY 2023-24 funds and \$200,000 from FY 2024-25 entitlement funds.

8	Goal Name	Support for the Homeless
	Goal Description	ESG (\$431,333) and HOPWA (\$1,612,461) funds are used to provide housing, services, and case management to prevent and respond to persons in a housing crisis. HOPWA funds include FY 2023-24 funds carried forward in the amount of \$213,000 and FY 2024-25 entitlement funds of \$1,399,461.
9	Goal Name	Administration Planning and Fair Housing
	Goal Description	HOME and CDBG funding is allocated for the management and administration of federal programs. CDBG admin funds in the amount of \$45,000 are allocated from FY 2024-25 entitlement funds, and are used to support planning activities. \$93,000 from CDBG entitlement funds is allocated in FY 2024-25 for Fair Housing investigations. \$873,040 in CDBG entitlement funds are allocated for administration (exclusive of Planning and Fair Housing allocations). The HOME program administrative allocation provides \$258,352 in funding. This includes \$34,686. allocated from previously unobligated Fy 2023-24 funds and \$223,665 in FY 2024-25 new entitlement funding. All beneficiaries are reported under individual projects and activities, with the exception of persons assisted with Fair housing investigations (est. 400 Households).

Table 5 – Goals Summary

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)

This year’s goals include the production of 101 new affordable housing units. Of this amount, eighty-three (83) are LIHTC units for families at or below 60% of Area Median Income (AMI). The Plan also anticipates fifty (50) homebuyers at or below 80% AMI will receive assistance with downpayments and closing costs.

Additional projects will begin construction in FY 2024-25; however, completion and lease up are not expected during the Fifth Year Action Plan period. Future affordable housing units supported with FY 2024-HOME funds include 170 assisted living units at Creston Park and seventy-five (75) units at Vita Nova for homeless persons with prior convictions. It is estimated that a future Affordable Housing Development Program solicitation will result in approximately thirty (30) new housing units.

Projects

AP-35 Projects – 91.220(d)

Introduction

The following initiatives and goals for the Fifth Action Year Plan are consistent with those established in the Five-Year Consolidated Plan with an effective date of July 1, 2020, and are compatible with the purposes set forth in **24 CFR Section 91.1**, that include:

- Affordable Housing Programs consisting of housing rehabilitation and new construction that focus on home ownership, programs to assist lower-income persons to attain home ownership; single and multi-family rental rehabilitation and new construction program activities.
- Economic Development activities targeting the low and moderate-income areas, and the Neighborhood Revitalization Strategy Area, including potential application(s) for Section 108 funds.
- Neighborhood improvement projects in low and moderate-income areas, Strong Neighborhoods Initiative areas, and the Neighborhood Revitalization Strategy Area.
- Assistance to the homeless and special needs populations through the Emergency Solutions Grant Program.
- Opportunities for Persons with HIV/AIDS and the Continuum of Care Program.
- Public facilities and services to assist special needs populations and persons with disabilities, including, but not limited to the elderly, senior citizens, chronically homeless individuals and families, sight-impaired persons, persons in drug and alcohol recovery, and persons diagnosed with permanent physical and mental disabilities.

The goals and objectives in this Fifth Action Year Plan specifically relate to the goals outlined in the 2020-2024 Consolidated Plan and the Department of Housing and Urban Development goals that include:

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

The program activities are outlined below in Section AP-38 as they relate to availability/accessibility, affordability, and sustainability through the provision of decent housing, a suitable living environment and/or economic opportunity.

Oklahoma City's formula grant funding allocations, as recommended for adoption this Fifth Action Year Plan (fiscal year July 1, 2024 through June 30, 2025), follow the priorities established in the five-year Consolidated Plan that expires June 30, 2025. The Fifth Annual Action Year Plan strategy contains specific funding recommendations to implement the goals established in the five-year Plan to the greatest extent possible, depending on federal funding allocations awarded to The City of Oklahoma City.

The funding recommendations for the 2024-2025 Fifth Action Year Plan were considered by the Citizen’s Committee for Community Development on June 4, 2024 and received their favorable recommendation. Final Plan approval was granted by the City Council on July 2, 2024. **Please note that it is The City’s intent to expend carry-forward balances (when applicable) from this Fifth Action Plan Year past the June 30th program year expiration. Funds carried forward may include obligated year-end balances that have not yet been expended; and/or unobligated funds available for reallocation. This action will ensure continued operations of regularly funded programs and activities during the transition between program years. Expenditure of funds carried forward may occur prior to HUD approval of the future FY 2025 First Annual Action Year Plan.**

Projects

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

Table 6– Project Information

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

Administrative funds have been committed for Fair Housing Enforcement to respond to on-going concerns about tenants rights and evictions. The City continues to prioritize affordable housing and homelessness prevention and reduction activities. A sewer extension to serve a low mod area which has a number of vacant lots was approved as a public facilities activity in FY 2021; the project did not come to fruition due to acquisition challenges, and those funds were recaptured and reallocated to other activities in this Fifth Action Year Plan. CHDO expenses and performance is expected to increase in the upcoming year with construction on the Walnut Street housing development project; therefore, the City has chosen to increase the CHDO setaside beyond the minimum 15% requirement by an additional \$1.8 million which is funded with resources carried forward from the FY 2023-24 program year. These funds will support construction of new homes for low to moderate income households.

AP-38 Project Summary

Project Summary Information

1	Project Name	Affordable Housing Development Program
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Affordable Housing Construction and Development
	Needs Addressed	Creation and Retention of Affordable Housing
	Funding	CDBG: \$268,276 HOME: \$7,932,757

<p>Description</p>	<p>CDBG funds in the amount of \$168,275.76 in obligated/unspent funds are carried forward from FY 2022 to support infrastructure development on Walnut Street. An additional \$100,000 is provided from FY 2024-25 entitlement funds for a total budget of \$268,276.</p> <p>HOME funds are allocated for several projects. A Request for Proposals (RFP) is expected to issued for new affordable housing under the HOME Affordable Housing Development Program. Funding for housing proposals includes \$1,757,796 reallocation of projected unobligated funds from prior program years and \$627,494in FY 2024-25 funding for a total allocation of \$2,385,290.</p> <p>Funds in the amount of \$660,000 are obligated to Hillcrest Green Apartments from FY 2024-25 entitlement fundsin support of a 43-unit LIHTC senior housing development. Funds in the amount of \$254,729 have been allocated to Progress OKC. This includes \$4,729.01 previously obligated and carried forward from FY 2023-24, and a proposed FY24 allocation of \$250,000 for construction and sale of two additional SF homes for Low-moderate income buyers. Progress OKC will provide a total of four (4) single family homes for sale to LM buyers during the program year. \$800,000 in unobligated funds has been carried forward from FY 2023-24 and reallocated for Creston Park Phase I. The Creston Park project is expected to provide 170 assisted units in 2025. An allocation of \$1.2 million is projected to be allocated to the OCHA Vita Nova project to support 75 units of supportive housing in the FY24 Fifth Action Plan Year. It is estimated that the future RFP may result in development of approximately thirty (30) units in future program years.</p> <p>CHDO funds in the amount of \$1,837,923 will be carried forward from FY 2023-24 obligated funds (The JPNA CHDO is expected to carry forward about \$742,373 in FY 2023-24 obligated/unspent funds. The Paseo CHDO is expected to carry forward about 755,550 in FY 2023-24 obligated/unspent funds. The Neighborhood Housing Services CHDO will carry forward \$340,000 in Fy 2023-24 obligated/unspent funds.) An additional \$459,316 will be allocated from FY 2023-24 unobligated funds. The activity will also be funded with the statutory 15% setaside of \$335,499 for a total Unallocated CHDO budget of \$2,632,738.</p>
<p>Target Date</p>	<p>1/1/2027</p>

	<p>Estimate the number and type of families that will benefit from the proposed activities</p>	<p>At least twelve (12) low to moderate income families will achieve homeownership in the Walnut Street LLC Village at Walnut project. These units include both HOME (CHDO) and CDBG support. Thirty (30) affordable housing units are expected be completed under the HOME program AHDP RFP over the next two program years; an additional 170 affordable units at Creston Park are expected, and will be reported in a future program year. Forty-three (43) LIHTC units for seniors are expected at Hillcrest Green II in the FY 2023-24 program year. Seventy-Five (75) studio units for chronically homeless persons are expected to be completed at the Vita Nova facility in the FY 2025-26 program year under the next five-year Consolidated Plan.. Four (4) single family homes are expected to be completed by Progress OKC in FY 2024-25.</p>
	<p>Location Description</p>	<p>The Walnut Street LLC project is located at the intersection of NE 26th St and N. Walnut Ave. The Creston Park development is located near NE 28th St and MLK. Two of the Progress OKC single family lots are located near NE 11th Street and Euclid.. The Vita Nova project is located at 1800 E. Reno Avenue. Future projects under the solicitation, new CHDO units, and the remaining two (2) Progress OKC unit sites remain to be determined.</p>
	<p>Planned Activities</p>	<p>Assistance with infrastructure costs and construction for the development of affordable housing units in the Walnut Street LLC project, and new construction of proposed affordable housing projects at Hillcrest Green II, Vita Nova, Creston Park Suites, and TBD Single Family home sites.</p>
<p>2</p>	<p>Project Name</p>	<p>Affordable Housing Rehab/Retention</p>
	<p>Target Area</p>	<p>City-Wide</p>
	<p>Goals Supported</p>	<p>Affordable Housing Retention and Rehabilitation</p>
	<p>Needs Addressed</p>	<p>Creation and Retention of Affordable Housing Prevention and Elimination of Homelessness</p>
	<p>Funding</p>	<p>CDBG: \$2,734,000 HOME: \$750,000</p>

	<p>Description</p>	<p>A total budget of \$750,000 in HOME funding is provided from re-allocation of unobligated FY 2023-24 funds for the Whole house Rehabilitation Program to rehab an estimated ten (10) homes for low to moderate income households.</p> <p>CDBG funds support multiple housing retention programs. \$24,000 is allocated from previously unobligated funds for the Pest Inspection and Treatment Program which assists infested units that are served under the HOME program Whole House Rehabilitation Program. The City’s Housing Exterior Maintenance Program is allocated \$1.2 million. This amount is inclusive of a new FY 2024-25 allocation of \$580,000, a reallocation of \$100,000 from FY 2023-24 unobligated funds, and \$520,000 unobligated/unspent funds carried forward from FY 2023-24. A separate allocation of \$675,000 for program delivery costs is also made from FY 2024-25 new entitlement funds to support costs of inspections, work write ups, bid administration, etc. related to projects. An estimated forty-eight (48) households will be served.</p> <p>\$235,000 is provided to OCHA from a reallocation of unobligated FY 2023-24 CDBG funds for the rehabilitation of approximately twelve (12) public housing units. \$600,000 is allocated to the City's Emergency Repair Program from FY 2024-25 entitlement funds to assist approximately forty-five (45) low to moderate income homeowners</p>
	<p>Target Date</p>	<p>6/30/2025</p>
	<p>Estimate the number and type of families that will benefit from the proposed activities</p>	<p>An estimated forty-eight (48) homeowners will receive exterior maintenance repairs, ten (10) homeowners will receive whole-house rehabilitations, forty-five (45) homeowners will receive emergency repairs, an estimated twelve (12) public housing units will be rehabilitated, and an estimated eight (8) pest inspection treatments will be provided.</p>
	<p>Location Description</p>	<p>City wide, with emphasis in the NRSA.</p>
	<p>Planned Activities</p>	<p>Exterior maintenance repairs, emergency home repairs, whole-house rehabilitation, and rehab of public housing units.</p>
<p>3</p>	<p>Project Name</p>	<p>Down Payment Assistance Program</p>
	<p>Target Area</p>	<p>NEIGHBORHOOD STRATEGY AREA</p>
	<p>Goals Supported</p>	<p>Homebuyer Financial Assistance</p>
	<p>Needs Addressed</p>	<p>Creation and Retention of Affordable Housing</p>
	<p>Funding</p>	<p>HOME: \$1,042,574</p>

	Description	HOME funds in the amount of \$1,042,574 will be used to assist approximately fifty (50) low to moderate income homebuyers. This includes \$242,574 in FY 2023-24 obligated/unspent funds, and \$800,000 in new FY 2024-25 entitlement funds.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	An estimated fifty - (50) homebuyers will be provided downpayment and closing cost assistance during the program year.
	Location Description	Funding is restricted to the Program boundaries with priority given to SNI and NRSA neighborhoods.
	Planned Activities	Down Payment and Closing Costs assistance to low and moderate-income homebuyers.
4	Project Name	Slum and Blight Remediation
	Target Area	City-wide
	Goals Supported	Elimination of Slum and Blight
	Needs Addressed	Slum and Blight Remediation
	Funding	CDBG: \$1,038,880
	Description	CDBG funds in the amount of \$788,880 have been allocated from FY 2024-25 entitlement funds to the Oklahoma City Urban Renewal Authority (OCURA) to assist with urban renewal completions, property maintenance and disposition. \$250,000 is made available for spot blight thru the City's Abandoned Buildings Program to secure vacant and abandoned properties. Of this amount, \$150,000 is allocated from obligated/unspent funds, and \$100,000 is allocated from unobligated FY 2023-24.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	The number of program beneficiaries under the OCURA allocation is contingent on the type, size and scale of projects funded. The Abandoned Building Program is expected to secure approximately 150 properties.
	Location Description	Urban Renewal Project Areas, spot blight locations
	Planned Activities	Securing vacant and abandoned properties, acquisition, disposition, clearance, relocation, and Urban Renewal completion activities.
	Project Name	SNI Public Services Activities

5	Target Area	Strong Neighborhoods Initiative
	Goals Supported	General Public Services-CDBG
	Needs Addressed	Public Services
	Funding	CDBG: \$420,000
	Description	A significant allocation of \$420,000 is provided to support public service activities in our SNI neighborhoods. This allocation includes \$420,000 from FY 2024-25 entitlement funds. This program provides several different services, including but not limited to neighborhood capacity building, youth services and after-school programs, neighborhood clean up, and hazardous tree removals.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 400 students will be served thru the STEAM program. Approximately forty (40) hazardous trees will be removed, and twenty (20) households will benefit from neighborhood cleanups.
	Location Description	Designated Strong Neighborhoods Initiative neighborhoods (Metro Park, Capital Hill, and MLK Jr).
Planned Activities	After school programming, summer youth programs, and hazardous tree removals.	
6	Project Name	SNI Public Facilities Activities
	Target Area	Strong Neighborhoods Initiative
	Goals Supported	Public Facilities and Infrastructure
	Needs Addressed	Public Facilities and Infrastructure
	Funding	CDBG: \$1,200,000
	Description	Funds in the amount of \$1.2 million are allocated for SNI public facilities projects. This allocation includes \$338,284 from obligated/unspent funds, \$447,954 reallocated from previously unobligated funds, and \$413,762 in new FY 2024-25 entitlement funds. These funds will support neighborhood grant projects, tree plantings, park improvements, Capitol Hill Plaza design, alley improvements, a trail connection, and new sidewalks in the SNI neighborhoods. Up to \$136,000 of this allocation may be used for program delivery.
	Target Date	6/30/2025

	Estimate the number and type of families that will benefit from the proposed activities	Sidewalk installation and park improvements will provide community-wide area benefit to approximately 3,214 households. Eighty (80) households will benefit from tree plantings. An estimated 3,214 households will benefit from SNI Neighborhood-led projects. 5,000 linear feet of sidewalks in Capitol Hill and Metro Park will serve 872 households.
	Location Description	Activities are limited to designated Strong Neighborhoods Initiative neighborhoods (Metro Park, Capitol Hill, and MLK Jr).
	Planned Activities	Sidewalk installation, park improvements, and tree planting
7	Project Name	Community Development-Public Services Activities
	Target Area	City-wide
	Goals Supported	General Public Services-CDBG
	Needs Addressed	Public Services Prevention and Elimination of Homelessness
	Funding	CDBG: \$210,000
	Description	CDBG funds in the amount of \$105,000 are allocated to COTPA from FY 2024-25 entitlement funds to provide discounted bus and taxi fares, and courier services to special populations. \$65,000 is allocated from FY 2024-25 entitlement to Community Health Services for services to the homeless. \$40,000 is provided to CASA from FY 2024-25 entitlement for child advocacy services within the foster care system.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Approximately fifteen (15) foster youth will be provided with advocacy resources. An estimated sixty (60) homeless persons will receive healthcare services. Approximately 63,000 discounted bus and taxi coupons will be provided to special populations (<i>Note: these represent vouchers provided, not persons served. Duplication can be expected</i>).
	Location Description	City-Wide
	Planned Activities	Foster Care Advocacy, Health care services for the homeless, transportation and courier services to special populations, and other eligible public service activities.
8	Project Name	Community Development- Public Facilities Activities
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Public Facilities and Infrastructure
	Needs Addressed	Public Facilities and Infrastructure

	Funding	CDBG: \$583,025
	Description	CDBG funds are allocated for the support of various public facilities activities. \$365,003 has been allocated from previously unobligated funds to support an undetermined community development public Facilities project. In addition, \$18,022.40 is allocated from FY 2024-25 entitlement funds for a total uobligated budget of \$383,025 . Support is also provided to Alpha Community Foundations for the Garden Oaks Community Center. The Alpha project is allocated \$200,000 from previously unobligated funds to support construction.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Projected beneficiaries of the Garden Ridge Community Center are difficult to quantify until programs and activities have been established. There will be an area wide benefit. Additional Beneficiaries may be realized thru a future CDBG Program solicitation and/or future Public Facilities activity; however, beneficiaries cannot be projected at the present time.
	Location Description	The Garden Ridge Community Center project is located at NE 1th Street and Bryant Avenue. Future project site(s) will be determined at a later date.
	Planned Activities	Infrastructure development and other eligible public facilities activities.
9	Project Name	Economic Development Programs
	Target Area	City-wide
	Goals Supported	Economic Development
	Needs Addressed	Economic Opportunity
	Funding	CDBG: \$440,000
	Description	CDBG funds are allocated to support economic development programs, including but not limited to small business services, \$40,000 is allocated to Community Action Agency to fund a small business training program. \$100,000 is allocated to provide a Section 108 loan contingency to ensure timely repayments to HUD. \$300,000 is provided to NewView Oklahoma for a waterline extension. These funds consist of \$100,000 from previously unallocated FY 2023-24 funds and \$200,000 from FY 2024-25 entitlement funds, to enable retention of 100 jobs.
	Target Date	6/30/2025

	Estimate the number and type of families that will benefit from the proposed activities	Approximately 290 small businesses will receive training and technical assistance. It is not expected that any jobs will be created in this Fifth Action Plan year from Section 108 loan activities. An estimated 100 jobs will be retained at NewView Oklahoma.
	Location Description	City-Wide
	Planned Activities	Small business training, job creation
10	Project Name	Homeless Programs
	Target Area	City-wide
	Goals Supported	Support for the Homeless
	Needs Addressed	Creation and Retention of Affordable Housing Prevention and Elimination of Homelessness
	Funding	HOPWA: \$1,612,461 ESG: \$431,333
	Description	ESG funds are used to provide services, emergency and transitional housing, and case management resources for the prevention of homelessness. HOPWA funding is allocated to support housing and case management for person with HIV AIDS. Funded activities include, but are not limited to rapid-rehousing, homelessness prevention, emergency shelter, permanent and transitional housing placement, outreach services, services to assist victims of domestic violence and homeless youth, Veterans services, and associated case management. The FY 2024-25 ESG allocation is \$431,333 . The FY 2023-24 HOPWA allocation is \$1,399,461 . HOPWA is also expected to carry forward \$213,000 from FY 2023-23 for a total budget of \$1,612,461 .
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 1,200 households will receive various services to respond to a housing crisis, 135 persons will receive STRMU/TBRA assistance, 117 persons will access emergency shelter, 250 individuals will access homelessness prevention services, 1,180 persons will receive public services targeted to the homeless, and 350 persons with HIV AIDS will receive housing support and case management services thru HOPWA.
	Location Description	City-Wide
Planned Activities	Rapid-rehousing, services to the homeless, TBRA, STRMU, emergency shelter, homelessness prevention activities, services to domestic violence victims and homeless youth, Veteran services, and case management.	

11	Project Name	Program Administration and Planning
	Target Area	City-wide (Fair Housing)
	Goals Supported	Administration Planning and Fair Housing
	Needs Addressed	Administration and Fair Housing Activities
	Funding	CDBG: \$1,011,040HOME: \$258,351
	Description	<p>HOME and CDBG funding is allocated for the management and administration of federal programs. CDBG admin funds in the amount of \$45,000 are allocated from FY 2024-25 entitlement funds, and are used to support planning activities. An allocation of \$93,000 is allocated in FY 2024-25 for Fair Housing investigations. \$873,040 in CDBG funds are allocated for administration (exclusive of Planning and Fair Housing allocations).</p> <p>The HOME program administrative allocation provides \$258,351 in funding. This includes \$34,686. allocated from previously unobligated funds and \$223,666 in FY 2024-25 new entitlement funding. An estimated 400 persons will be assisted with Fair Housing investigations.</p>
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 400 persons will be provided with investigative Fair Housing support thru the Metro Alliance with CDBG administration funding. Other associated beneficiary data for CDBG and HOME will be reported under individual project activities.
	Location Description	City-wide
	Planned Activities	CDBG and HOME program administration, CDBG planning support, and Fair Housing program activities.

Table 7 Project Summaries

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 July 2023 Census Quick Facts data, The City of Oklahoma City population is estimated at 702,767 persons contained within a land area of over 620 square miles. The community is racially diverse with a total minority population exceeding 38.6%. The minority population in Oklahoma City remains in transition. In the July 2023 Census Quick Facts data, persons of Hispanic or Latino origin represent 20.1% of the total population. African American persons, formerly the largest minority/ethnic population in Oklahoma City, now comprise 13.7% 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 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 an Enterprise Community. The NRSA is the area of the central city that contains the highest rates of poverty in the City and the largest number of substandard residences – many of which require some remediation for lead-based paint. The Census Tracts and Block Groups that comprise the NRSA include: 100400, 100500, 100700, 101000,101100, 101200, 0101300, 101400, 101500, 101600,101900, 102400, 102500, 102600, 102700, 102800, 102900, 103000, 103101, 103102, 103200, 103300, 103400, 103500, 103601, 103602, 103700, 103800, 103900, 104000, 104100, 104200, 104300, 104400, 104600, 104700, 104800, 104900, 105600, 105700, 105800, 1053002, 1053003, 1070012,1070013, 1070014, 1070021, 1070022, and 1073051.

The 2017 Tax Cuts and Jobs Act created new tax incentives for investments made in Opportunity Zones to spur economic development and job creation by encouraging long-term investment in low-income communities nationwide. Opportunity Zones are census tracts that were designated by state officials to be in most need of private investments; Oklahoma City has 8 designated zones within its boundaries.

Geographic Distribution

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

**SNI neighborhoods are within the NRSA, and are not duplicated here.*

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

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

The Strong Neighborhoods Initiative (SNI) is a concentrated effort by the City to identify and revitalize inner city neighborhoods with a goal of ending decline and restoring them to economically viable and sustainable communities. Rather than allocate funds sporadically throughout the City on a haphazard basis, we have chosen to focus resources strategically in a manner that will allow for noticeable improvement and positive impact over the long term. The designated SNI neighborhoods all are located within the NRSA boundaries and funding in these neighborhoods is included in the 80% targeting goal.

Discussion

The City of Oklahoma City strives to invest 80% of federal CDBG and HOME dollars within the NRSA, with an additional 20% allocated to projects and activities outside the NRSA boundaries. The SNI neighborhoods lie within the NRSA and are strategically targeted for reinvestment. Resources are allocated to SNI neighborhoods to the greatest extent possible. Two (2) SNI neighborhoods, Capitol View and Capitol Hill were selected during the FY 2017 Plan Year for participation in the SNI program. A third neighborhood, Metro Park, was selected to participate in the SNI program by the selection committee in March 2020. A new neighborhood, MLK Jr., was chosen to enter the SNI program on July 1, 2023, replacing Capital View.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The data in the following tables does not include any housing for the homeless; although it should be noted that ESG funds often support the addition of shelter beds. As these beds turn over frequently, it would be difficult to quantify the number of unduplicated individuals served. Non-homeless beneficiaries in the table below include DPA recipients (50) the production of new affordable units (101), whole house rehabs (10), emergency repairs (45), exterior maintenance (48) and the rehab of public housing units (12). The production of new units includes 12 units in the Village at Walnut Development (*Note: this project includes both CDBG and HOME CHDO funds and will be reported under HOME in the CAPER to avoid duplication of benefit*), two (2) additional CHDO homes, and an estimated thirty (30) units to be developed in future years under the pending HOME affordable housing solicitation. There are also 170 units in predevelopment for the Creston Park Phase I project expected to be completed in the FY 2024-25 program year. Four (4) single family homes constructed by Progress OKC, and Forty (40) units at Harmony School Apartments are nearing completion. The households listed in the special needs section include HIV/AIDS persons receiving TBRA (80) and STRMU assistance (170) thru HOPWA. Rehab of existing units includes ten (10) whole house rehabs, forty-five (45) emergency repairs, forty-eight (48) exterior maintenance repairs, and rehab of twelve (12) public housing units. Acquisition of existing units includes Fifty (50) DPA buyers.

One Year Goals for the Number of Households to be Supported with Housing Units	
Homeless	0
Non-Homeless	0
Special-Needs	0
Total	0

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance (TBRA/STRMU)	250
The Production of New Units	101
Rehab of Existing Units	115
Acquisition of Existing Units	50
Other (Creston Park Assisted Living)	170
Total	686

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

Discussion

Housing assistance is being provided to the extremely low income households thru ESG funds.

The City's Whole House Rehabilitation program can address substandard conditions with interest-free loans of up to \$42,500 for qualified low-moderate income homeowners. Terms of the interest-free loans are based on the household's ability to pay. The program has a minimum payment of \$100 a month. Within SNI neighborhoods, loans may be up to \$60,000, do not require monthly payments and are forgivable providing program requirements are met.

Senior citizens that are 62 years of age or older and have gross household income less than 60% of median at the time of application are eligible for a "Senior Loan" (a 5-year forgivable loan amortized at the rate of 1/60th a month). The borrower must continue to occupy the property for the term of the loan. If occupancy is terminated, whether voluntarily or involuntarily, any remaining balance must be repaid. An exception is made for seniors who are incapacitated. 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.

Programs to Assist Homeowners:

- CDBG Emergency Home Repair Program
- CDBG Exterior Maintenance
- HOME Whole House Rehabilitation Program
- Lead-based paint abatement in conjunction with the three previous listed programs

Projected 2024-2025 Housing Accomplishments:

- Emergency home repairs
- Exterior Maintenance projects
- Whole house rehabilitation projects
- Down Payment Assistance Loans
- CHDO Homes Constructed
- Public Housing Unit Rehabs
- Persons Provided Rental and/or Utility Assistance
- Affordable Housing Development- Program projects underway

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. CDBG funds are provided in the Fifth Action Plan Year to support the rehabilitation of approximately twelve (12) public housing units.

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

The City of Oklahoma City will continue to work with OCHA to increase the overall quality of public housing. Presently, the Housing Authority has sufficient resources to manage their properties; however, are unable to make all the needed upgrades and repairs. All housing is considered "average" by the Housing Authority. The City will provide CDBG funding for rehabilitation of approximately twelve (12) public housing units. The City is also including HOME funds in support of OCHA's Creston Park and Vita Nova projects in the Fifth Action Plan Year.

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

OCHA has set a goal of assisting ten (10) families annually in achieving homeownership through the

Housing Authority Family Self-Sufficiency Program and the Housing Authority Homeownership Program. Tenants are encouraged to pursue opportunities for homeownership through these programs as funding allows.

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

Not applicable. OCHA is designated as a standard performer.

Discussion

The Oklahoma City Housing Authority (OCHA) administers the City's public housing rental projects, 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 Section 8 subsidy requires that an eligible tenant pay (the higher of) 30% of adjusted income or 10% of gross income as their share of the rent. Section 8 funds compensate the landlord for 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

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

Describe the jurisdiction’s one-year goals and actions for reducing and ending homelessness including reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs.

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

Activities supported in the Fifth Action Plan Year to address homelessness include the provision of HOPWA funding for Short Term Mortgage and Utility Assistance (STRMU) and Tenant Based Rental Assistance (TBRA). ESG funds continue to support housing and case management activities for families. ESG funding is also committed for rapid re-housing and prevention services for homeless households with children.

In addition to the entitlement funds, the City has engaged a new Key to Home Program. The Oklahoma Key to Home Partnership was subsequently created as a collaborative team of service providers, local government, community leaders and funders with a mission to prevent and end homelessness. As one component, the Key to Home Partnership piloted an encampment-rehousing program in 2022. This is an intentional, structured effort to offer individuals in established encampments safe and dignified housing solutions prior to closing an area or reactivating it for general use. With 90% of the participants in the pilot program moving into housing with supportive services, the program is expanding. The goal is to pair housing with wraparound services to 500 unsheltered people by 2025.

Addressing the emergency shelter and transitional housing needs of homeless persons.

In the Fifth Action Plan Year, ESG funds are used to provide essential services to homeless families and individuals in emergency shelters as well as to support shelter operation costs. Costs associated with renovation or rehabilitation of structures to be used as emergency shelters is also an eligible use of funds. The City remains focused on housing relocation and stabilization services such as financial assistance and case management, which tend to be more intensive and longer in duration. In some instances, direct

financial assistance may be available to assist in the payment of rental and security deposits. Persons transitioning from homelessness are matched with the appropriate supportive case management services to ensure long term sustainability of housing.

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

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

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

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

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

appropriate for the individual or family's needs. The CES prioritizes based on vulnerability and length of time homeless, with the goal of decreasing the amount of time individuals and families experience homelessness. This may include assistance in obtaining permanent housing, medical treatment, mental health treatment, counseling, supervision, and other government or private assistance available such as:

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

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

ESG funding allocated in the Fifth 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 relocate from a substandard unit, it is allowable for case managers to assist in locating and moving households to housing units that meet minimum housing quality standards. Households receiving prevention assistance may require supportive services and follow-up care. The case manager is responsible for providing the appropriate supportive services and follow-up care, as determined on a case by case basis. Most prevention assistance will last from one (1) to six (6) months. A standardized housing assessment and housing plan is completed for all program participants to ensure housing stability after ESG assistance terminates.

Prior to issuing financial assistance, case managers work with the Housing Resource Locator to conduct a habitability and lead-based paint inspection of the home. A visual assessment/inspection for potential lead-based paint hazards is conducted for all pre-1978 units in which a pregnant woman and/or child

under the age of six will be residing before financial assistance is provided. Visual assessments/inspections must be conducted regardless of whether the program participant is receiving assistance to remain in an existing unit or moving to a new unit. All case managers are required to become a HUD-certified Lead-Based Paint Visual Assessor by successfully completing the 20 minute online training course on conducting visual assessments on HUD's website (even though the Housing Resource Locator is responsible for visual assessments/inspections).

The assigned case manager contacts the landlord or utility company immediately to prevent or delay imminent eviction or utility cutoff. If the case manager/Housing Resource Locator deems the housing to be substandard, then the case manager works with the household and the Housing Resource Locator to locate and secure more appropriate housing. Program participants must demonstrate the ability to earn sufficient income to sustain their permanent housing at the conclusion of program services.

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

Discussion

The City of Oklahoma City and local service providers use the Homeless Management Information System (HMIS) to track services provided to the homeless, and to prevent duplication of resources. Providers are required to record client demographic and program data in the community's Homeless Management Information System (HMIS). All ESG partner agencies must comply with HUD's most recent HMIS Data Standards and agree to maintain excellent data integrity by entering 100% of required data fields in real time (data entered at time of service). To assist in this requirement, agencies run and/or review appropriate reports weekly to ensure consistent compliance. Agencies are required to correct inaccurate or incomplete data within three (3) days and utilize Service Point's network support and technical assistance as needed to ensure proper software usage and data integrity.

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

AP-70 HOPWA Goals– 91.220 (I)(3)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	170
Tenant-based rental assistance	80
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	25
Total	275

Table 11 – HOPWA Goals

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

Introduction:

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

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

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

Discussion:

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

AP-85 Other Actions – 91.220(k)

Introduction:

The local and federal resources are insufficient to address all needs, even those of high priority. In some instances, there are perceptions in the community that affordable housing will decrease area property values as well as facilitate other societal problems (NIMBY issues). There has been a lack of interest from service providers in developing permanent supportive housing for the chronically homeless (lack of developers). Private builders are not interested in and/or cannot produce positive cashflow from affordable units without deep financial subsidy. The City of Oklahoma City continues to encourage and prioritize mixed-income developments in which market rate units may assist in offsetting lower rents on affordable units.

Actions planned to address obstacles to meeting underserved needs.

Fair Housing Activities are funded with CDBG under General Program Administration. The services are provided by Metropolitan Fair Housing Council which investigates and reports on fair housing for the City to ensure equitable access and opportunity for all persons. Continued funding for these activities has been included in this Fifth Action Plan Year.

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

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

Actions planned to foster and maintain affordable housing.

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

Funds for activities that support new housing construction under the HOME program are provided to the Community Housing Development Organization Program (CHDO), and to the Strong Neighborhoods

Initiative (SNI) Program. The City provides funding to certified CHDOs based on requests from CHDOs in good standing. The successful CHDOs are awarded HOME CHDO set-aside funds to construct, and in some cases, rehabilitate existing housing units in targeted neighborhoods. SNI funding for new housing construction is typically limited to non-profit organizations and is awarded on a competitive basis.

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

Housing rehabilitation activities are provided through Whole House Rehabilitation Program citywide with strong 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. This program has, however, been recently thwarted by a lack of contractors with certifications required to perform lead abatement activities. The amount of funds required to completely rehab some of the housing to meet housing quality standards has also been prohibitive.

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

Single Unit Rehabilitation is addressed by CDBG funding through eligible program activities that include the CAA's Emergency Home Repair program, the CDBG Home Exterior Maintenance Program, and on a targeted basis, projects within the Strong Neighborhoods Initiative areas. These programs require income qualification and environmental review compliance. In addition, CDBG funds are allocated to the Pest Inspection and Treatment Program to assist with the identification and remediation of infestation for units assisted under the Home Whole House Rehabilitation Program.

Public Housing Modernization is provided through the Oklahoma City Housing Authority (OCHA). OCHA is allocated CDBG funds to make needed repairs to approximately twelve (12) public housing units annually.

Actions planned to reduce lead-based paint hazards.

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

The City funds various activities that fall into the category of residential rehabilitation. Whenever residential rehabilitation activities funded by the City are conducted, the regulations prescribed for lead-based paint, contained at 24 CFR Part 35 will be the guide for achieving compliance. Under the regulations, the City is required to adopt proper approaches to Lead Hazard evaluation, to provide regulatory

notifications to the homeowner, to perform Lead Hazard evaluation, and to follow safe work practices and clearance requirements. For activities involving rehabilitation under Subpart J, Tenant Based Rental Assistance under Subpart M, if any, and Subpart K for Homebuyers and special needs properties, options for remediation of lead based paint and potential funding sources for cleanup will be discussed with the applicant based upon the amount of funds available for each activity.

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

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

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

Actions planned to reduce the number of poverty-level families.

The City does not have a formal antipoverty strategy but has implemented numerous local and federal job creation and education programs to reduce poverty. In 1993, the citizens of Oklahoma City passed the first of four Metropolitan Area Projects (MAPS) initiatives to support the construction of public facilities, infrastructure, recreational facilities, and with the most recent initiative social service support for the homeless and domestic violence victims. The total public investment from MAPS funding to date is well over \$2 billion. Projects and services supported with the MAPS initiatives improves the quality of life city-wide and serves as a catalyst to substantial private development. This in itself promotes economic development and provides opportunities for all that may not have otherwise been available. The City also uses bond funds and Tax Increment Funding (TIF) in support of economic development projects that will create jobs or increase property taxes.

Voters approved a new MAPS 4 sales tax in December, 2019, 75% of which will provide financial support for social service needs. Over \$55 million from this revenue source is dedicated to development and retention of affordable housing. Additionally, funding from MAPS 4 will assist projects addressing domestic violence, mental health, and people exiting incarceration in order to reduce the number of

people entering poverty and homelessness.

The City will continue to provide prevention, rehousing, case management and other assistance to families and people living with HIV/AIDS as well as other eligible individuals. However, they are only a fraction of the population paying more than a third of their income for housing.

In addition to the locally funded economic development and job creation efforts to combat poverty, the City utilizes federal resources to stimulate job growth. The Community Action Agency manages a small business development loan fund capitalized by a \$4 million Section 108 Loan Guarantee. The loan fund was established to make loans to small businesses in the Neighborhood Revitalization Strategy Area.

Actions planned to develop institutional structure.

The City has formed partnerships with the Chamber of Commerce and area banks to participate in and deliver economic development services and funding. The Community Action Agency (CAA) is funded to conduct an economic development activity with CDBG funds and the Section 108 Loan Guarantee Program. The City's ongoing economic development programs and Section 108 Loan Guarantees generally include the participation of local lenders. Partnering banks include Bank of Oklahoma, Bank of America, BankOne, BancFirst, First State Bank, Legacy Bank, Arvest, Bank 7 and InterBank (among others) to assist with the Murrah District Revitalization Program, CAA small business loan program, Current Section 108 Loans, Section 108 Small Business Fund, and Housing assistance to lower-income persons and special populations. Funding is provided through multiple community partners including OCHA, CAA, NHS, City Care, designated CHDOs, Oklahoma State Department of Commerce, and CEC.

Assisted social service agencies that assist the homeless with shelter, outreach and housing assistance through ESG, HOPWA and City of Oklahoma City general funds currently include the Homeless Alliance, Upward Transitions, the YWCA, SISU Youth, Mental Health Association of Oklahoma, Neighborhood Services Organization, Positive Tomorrows, City Care, Community Health Centers, and Pivot. These organizations also help plan and execute the annual Point In Time count with other government agencies.

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

League of Greater Oklahoma City.

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

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

The Oklahoma Key to Home Partnership was recently created as a collaborative team of service providers, local government, community leaders and funders- with its mission to prevent and end homelessness. This effort resulted in an expansion and restructuring of the CoC Board. Key to Home partners include over 40 organizations – the majority of which are social service agencies, but also include the Housing Authority government agencies such as the Dept. of Human Services, Dept. of Mental Health and Substance Abuse, and philanthropic funders. A primary goal of the Key to Home program is to promote enhanced communication and coordination to better serve persons who are homeless or at risk of homelessness and to minimize duplication of services. More information on this program can be found at [Key to Home | City of OKC](#).

Discussion:

In addition to the above initiatives, direct home ownership assistance is provided with HOME funds to down payment and closing cost assistance provider(s). Funding to the down payment assistance (DPA) provider(s) is prioritized to providing 80% of the funds to homebuyers in the NRSA and Targeted Areas (when practicable), and the additional 20% to homebuyers within the remainder of the DPA lending area. The Targeted Areas generally encompasses the NRSA, CHDO construction developments and other non-profit affordable housing developers and any low/mod areas specifically targeted for home ownership funding. The General DPA portion of the program includes low and moderate-income areas contained within designated program boundaries. Targeted areas have been identified both within and outside the general boundaries. Eligible areas may be found in the map attached in Appendix 5a.

HOME down payment assistance provides a loan up to \$18,000 based on need that is forgivable at the rate of 1/84th per month over a seven-year affordability period to eligible homebuyers. Due to rapidly rising interest rates during this Fifth Action Year Plan, an additional \$5,000 can now be reserved to buy down the interest rate if needed to make the loan payments affordable. When HOME funds are utilized for DPA, the maximum sales price of the home cannot exceed 95% of the area median sales price of homes in the jurisdiction. The limits are published annually by HUD and enforced in the City's DPA Program.

Program Specific Requirements

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

Introduction:

Program Income (PI)-The City does not anticipate additional CDBG PI prior to June 30, 2024. \$2,500 was received during the Fourth Action Plan year (FY 2023-24) and is included in reallocations/redistribution to FY 2024-25 activities. An indeterminate amount of Program income is anticipated in the Fifth Action Plan Year (FY 2024-25); however, has not been used for allocation purposes in the development of this Plan. \$2,434,981 in FY 2023-24 prior year CDBG funds (both obligated and unobligated) are identified in this Fifth Action Plan Year. CDBG funds capitalized a \$750,000 revolving loan fund (RLF) in 2015 which was later discontinued. One loan closed under this program. Annual RLF program income from this single RLF transaction is projected at \$5,362.32 in the Fifth Action Plan Year. Oklahoma City has not invested CDBG funds in float funded activities. PI that is received will be allocated as follows: 1) PI generated from Section 108 Loan investment and repayment accounts will be used to pay Section 108 principal and interest; 2) PI that is generated by the Oklahoma City Urban Renewal Authority (OCURA) activities during the current program year may be reallocated back to OCURA for use in other CDBG eligible activities subject to review and approval by The City and compliance with all contractual requirements for use of these funds; 3) CDBG funding rebates provided by material suppliers from Oklahoma City Housing Assistance Program activities will be allocated to the Oklahoma City Housing Assistance Program to assist with funding additional Housing Exterior Maintenance projects; 4) 20% of all CDBG PI may be used to create additional administrative capacity, and CDBG PI may be used to fund administrative expenses during the program year in which it is realized; and 5) In accordance with CPD Notice 97-9, III.J., HOME PI deposited to the PJ's letter of credit that creates additional administrative capacity may be used by the PJ for administrative expenses incurred during the Action Year, and any excess administrative capacity will be carried forward to subsequent years.

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

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out. **NOTE: Due to character limits in the HUD software system, additional information regarding the CDBG items below are continued under the HOME Investment Partnerships section immediately following.**

- | | |
|--|----|
| 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed | 0 |
| 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan. | 0 |
| Annual Action Plan | 56 |

3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income.	

Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. 70.00%

**HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)**

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

Continued from Introduction Above due to character limitations....Preceding Program Year Income- Oklahoma City forecasts PI and allocates the forecasted PI in Annual Action Year Plans. All PI is reported in IDIS and in financial reporting to HUD. **Section 108 Proceeds-**Proceeds from Section 108 Loan Guarantees have been utilized to stimulate economic development and create low and moderate-income jobs. All Section 108 Loans have been fully disbursed. The Small Business Assistance Section 108 Loan was established to provide access to capital for small businesses located in the NRSA. Proceeds from loan payments and interest earned on all loan repayment accounts associated with the Section 108 Loan Guarantees are used to make debt service payments. In April, 2019, a Substantial Amendment to the Fourth Action Year Plan under the FY 2015-2019 5-Year Consolidated Plan was approved authorizing a new Section 108 Loan Program to facilitate payment of certain pre-award soft costs for a Section 108 loan to First National Center, subject to HUD approval of final loan documents. No disbursements were made in the FY 2018, 2019, or 2020 program years. \$11,242,000 was disbursed in FY 2021. A formal application to HUD for project financing was approved in the FY 2021 Second Action Plan Year. No Section 108 loan applications were received during the FY 2023-24 program year. **Surplus Funds-** The City of Oklahoma City received a return of \$94,105 in 2023-24 CDBG PI prior to the beginning of the Fifth Action Year Plan that had not yet been allocated. An undetermined amount of CDBG PI is projected in the Fifth Action Plan Year; however, is not used for allocation purposes at this time. A total of \$2,434,9811 in FY 2023-24 unexpended CDBG funds exists

from prior years, of which \$677,791.79 is obligated under previous contracts. The remainder of unobligated funding (\$1,757,189.57) is available for allocation. The City received a return of \$230,860 in FY 2023-24 HOME PI prior to the beginning of the Fifth Action Plan Year. A total of \$7,721,924 in unexpended FY 2023-24 HOME funds exists from prior years, of which \$1,348,152.68 is obligated under previous contracts. The remainder of unobligated funding (\$6,373,771.40) is available for allocation. **Unexpended Program Funds-** All obligated/unspent funds will carry forward to the following Action Plan Year, and be added to the budget line of the applicable program/activity to ensure continuation of program activities between program years. **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 Fifth Action Year Plan. **Allocation of CHDO Loan and Grant activities-** CHDO funds may be reallocated and used as either loans or grants for projects. Funds dedicated to CHDO lending may be reallocated to the CHDO set-aside activities to ensure timely allocation and efficient use of these resources in the production of affordable units.

NOTE: In reference to item no. 2 above under the "Other CDBG Requirements" section, the City of Oklahoma City began its 3-year ratio in the Second Action Plan Year of the Consolidated Plan. The three-year period in the Fifth Action Plan Year will cover the years 2024-25; 2025-26; and 2026-27 (70% of a 3- year average beginning in FY 2021-22 as year one). This Fifth Year Action Plan is year one (1) of the 3- year ratio average.

NOTE: Pre-award Costs: In compliance with 2 CFR 200.458, pre-award costs for both HOME and CDBG construction activities will be permissible to the extent that they would have been allowable if incurred after the date of the Federal award but before the effective date of the City contract. Preaward costs that incur before the date of the Federal award, are not approvable unless specifically approved by HUD.

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

The Homebuyer Down Payment Assistance Program (DPA) funded by Oklahoma City will utilize the Recapture Method provided in the HOME Regulations at 24 CFR 92.254(a)(5)(ii). Recapture provisions ensure that the participating jurisdiction recoups all or a portion of the HOME assistance given to a homebuyer if the housing does not continue to be the principal residence of the family for the duration of the period of affordability. If the house is to be sold, the amount subject to recapture will be prorated and dependent on the amount of time the homeowner resided in the home. The City has determined a 7-year affordability period for its DPA program, and DPA is made in the form of a forgivable loan. The affordability period will be documented and secured by a Homebuyer Agreement Deferred Note & Mortgage in favor of The City to be released at the end of the affordability period. If the home is vacated by the owner(s), whether voluntarily or involuntarily, prior

to the end of the affordability period without a bona fide sale, all direct assistance provided is due and payable immediately.

The affordability period for any other HOME assistance to the homeowner will be based upon the total funds subject to recapture as described in 24 CFR 92.54(a)(5)(ii)(A)(5).

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

The City will recoup all or a portion of the HOME assistance provided to the homebuyers if the homeowner no longer resides in the house as his or her principal residence. If the house is to be sold, the amount recouped will be prorated and also be subject to the availability of net proceeds. Net proceeds are here defined as the sales price minus superior loan repayment (other than for loans made with HOME funds) and minus any closing costs. The direct subsidy provided to the homebuyer, i.e., down payment and closing cost assistance and/or the difference between the fair market value of the property and a reduced sales price attributable to HOME funds, will be recouped on a pro-rata basis per the HOME regulations at 92.254(a)(5)(ii)(A)(2). The pro-rata value will be calculated based on a monthly occupancy period (i.e., for DPA, prorated at 1/84th per month of occupancy). If the combined DPA and reduction in fair market value is equal to or greater than \$15,000.00 but less than \$40,000.00 then the affordability period will be 10 years or 120 months.

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

EXAMPLE:

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

Additionally, those participating in the DPA program are subject to refinancing restrictions. Requests to subordinate the City's note may be approved only if the refinancing clearly shows significant benefits such as a lower interest rate, shorter term, and provided there is no cash to borrower from equity, and The City remains in the same or better position on the mortgage. The new mortgage shall

not have a loan-to-value ratio (LTV) greater than 95% and refinance fees must be reasonable and customary for the OKC market.

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

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

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

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

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

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

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

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

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

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

The City works with numerous nonprofit social service providers through the Key to Home/Continuum

of Care (CoC) program. The CoC Board coordinates the City's homeless assistance programs and the development of the City's annual CoC grant application. The City conducts an annual Point-in-Time (PIT) count of the homeless in January of each year. Data gathered through this effort, coupled with consultation with local homeless service providers was used to inform the City's most recent homeless strategy document, *Strategies to Address Homelessness in Oklahoma City*, accepted by the City Council in September of 2021. While not the definitive measure to count the homeless population; the PIT snapshot count provides information about current trends and helps to identify gaps in services and housing. Oklahoma City has focused on housing for individuals who are chronically homeless through funding from the HUD CoC competitive grant and a commitment of matching HOME funding. The City, through community partnerships has worked to create permanent supportive housing beds in its effort to eliminate homelessness.

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

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

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

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

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

5. Describe performance standards for evaluating ESG.

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

Eligible Activities: Applications can include one or more of the eligible ESG activities: Street outreach,

emergency shelter, Homeless prevention TBRA and Housing Relocation and Stabilization Services, Rapid re-housing, and/or centralized intake.

The City of Oklahoma City offers a “no wrong door” approach, with providers being well linked to available resources through networking connections gained via the Coalition To End Poverty. In addition, 211 is the information and referral agency which provides information about eligibility and referrals to service agencies. 211 conducts public awareness campaigns throughout the year with public service advertisements located on television, radio, on city buses and signage. People are linked to public benefits through provider agencies. All agencies have been trained to assist people in applying for benefits through Social Security and Medicaid. Training was conducted through the SSI/SSDI Outreach, Access, and Recovery grant (SOAR). In 2013, the City of Oklahoma City joined the 100,000 Homes Campaign in an effort to move the medically frail and chronically homeless individuals into permanent housing using a housing first approach. As part of this process, members of the chronically homeless population are administered a vulnerability index survey to determine their health issues. Those determined to be the most medically frail are prioritized for immediate placement into housing. A case management committee comprised of various service providers assigns a case manager as needed. The case manager and service provider are selected and assigned based upon the needs of the individual being housed. Since joining the 100,000 Homes Campaign at the beginning of 2013, local non-profit service providers have collaborated to house over 1000 chronically homeless individuals, exceeding their goal by more than 40%.

HOPWA sponsors are selected using the following process:

The Housing and Community Development Division of the City’s Planning Department publicly posted notification of the availability of FY 2023-24 HOPWA funds. This information was communicated through an email notification to the Coalition to End Poverty (CEP) list serve. The recipients consist of private and public entities not previously selected, including grassroots organizations. This information is also posted on the CEP’s public website and announced at associated CEP and committee meetings. Applications from interested parties are received and reviewed by City of Oklahoma City staff. This review ensures project proposals meet minimum threshold requirements, including consistency with the Five Year Consolidated Plan and the Annual Action Plan. All applications that meet minimum threshold requirements are presented to the Continuum of Care (CoC) Board where each is scored and ranked.

Discussion:

The Oklahoma City Continuum of Care (CoC) and ESG Written Standards are attached as Appendix 8 in the complete public copy of the report provided in the unique appendices section (AD-26).

APPENDIX 1

CONSOLIDATED PLAN TIMELINE

Public Participation Timeline
FY 2024-25 Fifth Year Annual Action Plan

2023

- December 1 Confirmed and reserved facilities for public meetings in January for onsite meetings. Arrange for bi-lingual staff representation if possible.
- December 15 **Submitted** notice of Public Hearing/Planning input sessions ad to OPUBCO and/or minority and Hispanic news publications.
- December 22 **Published** notice of Public Hearing/Planning input session to be held in person for the following dates and times:
- Public Meeting 1- Meeting to be held at Ralph Ellison Library, 2000 NE 23rd St, Oklahoma City, OK 73111 on January 23, 2024 at 3:00 p.m.
- Public Meeting 2- Meeting to be held at Capitol Hill Library, 327 SW 27th Street, Oklahoma City, OK 73109 on January 25, 2024 at 6:00 p.m.

2024

- January 23 Public Meeting 1-Ralph Ellison Library, Wednesday January 23 at 3:00 p.m.
- January 25 Public Meeting 2-Capitol Hill Library, Thursday January 25 at 6:00 p.m.

February- March

Staff budget discussions, identification of strategic goals, and identifications of fifth year funding recommendations based on available numbers (assumes flat funding). Schedule and meet with consultants, governmental organizations, housing agencies, advocates and service providers to discuss barriers, gaps and priority needs.

- May 7 Final allocations announced by HUD
- May 24 Combined Notice to be **submitted** to OPUBCO and/or minority and Hispanic news sources for publication (*Combined Notice for 30-day comment period and Notice of Public Hearing at Council on July 2nd*)
- May 27 Staff reports due for CCCD meeting on June 4, 2024.
- May 31 **Publication** of Combined Notice of 30-day comment period and Notice of Public Hearing. (*must publish on Friday. No Saturday or Sunday legal notices*).

- June 3 Begin routing process for documents in Prime.Gov. Director Deadline is 6/11 for 7/2 Council Meeting *(must include a near final draft of the plan that will be submitted to HUD).*
- June 4 Citizens Committee for Community Development meeting- Presentation to discuss and approve funding priorities for the 2024-25 Fifth Action Plan Year; and to address any last minute concerns or recommendations prior to City Council.
- June 10 Written and electronic public comments are due to Staff by 5:00 p.m. for inclusion in Council presentation. Additional feedback may be provided on or before the July 2nd public hearing for inclusion in the final HUD document.
- June 11 Director Deadline for document review
- June 25 Clerk's office deadline for July 2nd City Council meeting.
- July 2 City Council public hearing and action on the Fifth Action Plan Year
- July 5 Submit 2024-25 Fifth Annual Action Year Plan to HUD *(Due to HUD on the later of May 15th, or 60 days following HUD funding allocation announcement. July 8th is the statutory due date for FY24 based on the notice date of allocations, unless otherwise extended).*

APPENDIX 2

CITIZEN PARTICIPATION COMMENTS

Housing and Community Development (HCD)

Annual Action Plan Meeting Notes-Public Input Meeting 1

23 January 2024 at 3:00 P.M. Ralph Ellison Library, 2000 NE 23rd St.

Attendees: **17** Total (**11** Community and **6** Staff)

Comments from the public after presentation:

1. A representative from Progress OKC suggested an increase in the Downpayment Assistance Program limits to align with higher construction costs and increased mortgage rates. It was noted that qualifying buyers at 80% AMI is becoming increasingly difficult in today's economy. The speaker suggested finding creative ways to assist homebuyers such as allowing funds to be used not only for downpayment and closing costs assistance, but to buy down interest rates and pay points on the mortgage.

Staff response: In 2023, the program was revised to increase DPA to a maximum of \$15,000 to 18,000 plus allowance of an extra \$5,000 for buying down the mortgage interest rate if feasible and necessary to support the client based on a case-by-case review. This also resulting in an increase of the affordability period from 7 to 10 years. This funding level is generous compared with other DPA programs currently and historically available, and no further increase is anticipated in the short term.

2. A citizen inquired whether CDBG funds could be used to provide Downpayment Assistance.

Staff response: Although Downpayment assistance could be an eligible use for CDBG, for maximum flexibility the program would have to be funded as a Public Service activity. As there is a 15% statutory cap on all Public Service activities, we do not have the capacity to fund it unless other programs are dropped. Since we already have DPA program under HOME, this has not been a desired approach. Other options exist for DPA funding under CDBG, however there are regulatory limitations that cap the amount that may be provided vs. allowances under the HOME program.

3. A citizen inquired about how funding can be increased for public spaces, and whether there are caps for assistance.

Staff Response: Funding under Public facilities may be an option for certain public space initiatives. However, public facilities must be owned by local government or non-profit organizations. We frequently have funds available for this purpose, however what is available can vary widely depending on the year and timing of the request. When there are significant available funds, we periodically issue a solicitation for proposals. When there are no open solicitations, Staff can accept written proposals for consideration. These funds are generally allocated on a competitive basis. The amount of assistance available is determined by available resources, and also by the projected public benefit based on regulatory requirements.

4. A member from the public requested support for small business development and they were referred to The Alliance for Economic Development to see if there are available resources. Additionally,

Community Action Agency is funded with CDBG each year to teach classes for small businesses that may be of benefit

Housing and Community Development (HCD)

Annual Action Plan Meeting Notes- Public Input Meeting 2

25 January 2024 at 6:00 P.M. Capitol Hill Library, 327 SW 27th Street

Attendees: **7** Total (**4** Community and **3** Staff)

Due to low citizen turnout, the formal slide presentation was not made. Staff met with the four members of the community in a roundtable setting and discussed their thoughts and concerns about our community development goals, objectives, and funding needs.

- Citizen input included the need for additional funding to support affordable housing development; specifically in SNI neighborhoods and the Paseo district.
- Housing for the homeless was noted as a significant community need.
- It was suggested that the City be allowed to reacquire homes with code violations. This could assist developers who are unable to pay \$50,000 for a vacant lot and still build affordably.
- It was noted that Oklahoma Public Schools should consider donating vacant buildings for affordable housing development.
- An inquiry was made about resources available for the homeless. Staff responded that HOPWA, ESG, Continuum of Care, and CDBG public facilities funds are available to assist, albeit very limited.
- The need for additional public services capacity was noted.
- An inquiry was made about the status of City-owned property on NW 10th Street. Staff responded that the Economic Development Alliance is working on an RFP for those lots. It is expected that affordable housing, mixed-income, mixed-use, and rear-entry parking will be prioritized.

Housing and Community Development (HCD)

Annual Action Plan Meeting Notes-Citizen's Committee for Community Development

4 June 2024 at 3:30 P.M. Jim Couch Municipal Office Building, 420 W. Main St., 10th Floor Conference Room

Attendees: **19** Total (**9** Committee Members, **2** non-profit representatives, and **8** Staff)

Committee Member inquired if there has been a decline of the Home Exterior Repair Program participation due to the increasing amount of low to moderate income that are renters and not Homeowners.

Staff response was that the program is still being used although numbers are down. One of the problems plaguing the program is that houses needing significant work are over the dollar threshold caps, and thus we are unable to assist. Also, the cost of needed repairs sometimes exceeds the return on value. One program which has seen a decline over the last few years is the Down Payment Assistance Program. Requests for DPA are slowly coming back but with rising inflation, rapidly increasing interest rates and construction costs, it has become more difficult to qualify income eligible buyers.

Multiple committee members inquired how our programs are being advertised.

Staff response was that staff participates in events such as housing fairs, where we offer an information booth, several times throughout the year. The program is also advertised in the OKC Utilities water bill and in SNI social media programs.

A Committee Member inquired if OCURA must provide reporting to the City on how the funds are expended, or if they just get the money each year.

Staff response was each year there is a funding agreement approved by City Council defining the terms and expectations, and what they need to report. OCURA does provide a comprehensive report of their related activities each year. Additionally, the funds are available to OCURA only as reimbursement for expenses and they are not approved without documentation supporting their expenses

A non-profit spokesperson briefed the Committee on behalf of the Alpha Community Foundation and described the renovations for the Garden Oaks Community Center that have already been completed, the programs they have offered, and their plans for phase II to complete the second building wing. CDBG funds were requested to help in that effort. The proposed Action Plan includes funding for this project.

A representative of NewView Oklahoma spoke on behalf of the organization and described their mission to provide job training and employ persons with visual impairments. Their proposed project will support a facility that employs over 100 people, most of whom are blind or visually impaired. The building needs a higher capacity water line to allow for the installation of a fire suppression system. This feature is necessary to secure property insurance and keep the facility open. The proposed Action Plan includes funding for this project.

A Committee member asked about the most common complaints that the Metro Fair Housing Council receives.

Staff stated her recollection that a high percentage are tenant/landlord complaints, followed by race, mortgage declines, and unsafe senior housing.

Staff asked if there were any additional questions or comments about the 2024-2025 Fifth Action Year Plan.

The Committee Chair recommended that the plan be moved forward to City Council for consideration. The Committee approved the motion unanimously.

Housing and Community Development (HCD)

Annual Action Plan Public Hearing-City Council

2 July 2024 at 8:30 A.M. City Council Chambers, 200 N Walker, Ste. 300

Comments pending

APPENDIX 3
GLOSSARY OF TERMS

Glossary

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

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

APPENDIX 4

ANNUAL OBJECTIVES TABLE

ANNUAL ACTION PLAN OBJECTIVES

FIFTH ACTION YEAR PLAN FY 2024-2025

AFFORDABLE HOUSING CONSTRUCTION AND DEVELOPMENT

Objective:

<i>Affordable Housing Development Program</i>	
HOME-Affordable Housing Development Program (AHDP) Harmony (40 units) , POKC (4 units), Creston Park (170), Hillcrest Green (43)Future RFP TBD	257 units
HOME-CHDO Homes (excludes Walnut St listed below. It has both CDBG/HOME funds)	2 units
CDBG-Walnut Street LLC Project	12 units

RETENTION AND REHABILITATION OF AFFORDABLE HOUSING

<i>Affordable Housing Rehab and Retention</i>	
CDBG-Housing Exterior Maintenance Program (HEMP)	48HH
CDBG-Emergency Repair	45 HH
CDBG- OCHA Inspection Program	10 units
CDBG- OCHA Public Housing Modernizations	12 units
HOME- Housing Assistance Program (HAP) Whole House Rehabs	20 HH
HOPWA-Tenant Based Rental Assistance (TBRA)	45 HH
HOPWA- Short Term Mortgage, Rent, and Utility Assistance Payments (STRMU)	90 HH

HOMEBUYER FINANCIAL ASSISTANCE

<i>Homebuyer Financial Assistance</i>	
HOME-Homebuyer Down Payment Assistance Program (DPA)	50 HH

ELIMINATION OF SLUM AND BLIGHT

<i>Slum and Blight Remediation Programs</i>	
CDBG-OCURA Urban Renewal Completions	2 units
CDBG-Abandoned Buildings Program	150 units

PUBLIC SERVICES

<i>Public Service Activities</i>	
CDBG-Youth Services-STEAM (SNI)	400 LMC
CDBG-Hazardous Tree Removal (SNI)	40HH
CDBG- Neighborhood Cleanup Projects (SNI)	20 HH
CDBG- Transportation Services-COTPA (CD) (<i>services may be duplicated</i>)	63,000 LMC
CDBG-Community Health Services (CD)	60

PUBLIC FACILITIES

<i>Public Facilities and Infrastructure</i>	
CDBG-Capitol Hill/Metro Park Sidewalks (SNI)	5,000 LF/872 HH
CDBG-SNI Parks Project (SNI)-Plaza A&E, Trail Connection, park	3,214 HH
CDBG-SNI Tree Plantings (SNI)	80 HH
CDBG-Neighborhood-led projects (SNI)	3,214 HH

ECONOMIC DEVELOPMENT AND OPPORTUNITY

<i>Economic Development Programs</i>	
CDBG-CAA Small Business Training Assistance Program	300 businesses
Section 108 Loan	TBD LM Jobs
NewView Oklahoma-Job Retention	100 LM Jobs

HOMELESSNESS PREVENTION

<i>Homeless Programs and Services</i>	
HOPWA- Assistance to Persons with HIV/AIDS (TBRA/STRMU reported in hsg. above)	450 LMC
ESG-Homelessness Prevention	250 LMC
ESG-Shelter (individuals served)	1,200 LMC
ESG-Shelter (beds provided)	120
ESG-Public Services to the homeless	1180 LMC
HOPWA-Supportive services and Case Management	350 LMC

ADMINISTRATION, PLANNING AND FAIR HOUSING

<i>Program Administration and Planning</i>	
CDBG- Fair Housing Compliant Investigation	400 HH

APPENDIX 5

DOWN PAYMENT ASSISTANCE PROGRAM AND NEIGHBORHOOD REVITALIZATION STRATEGY AREA BOUNDARIES

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

Introduction

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

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

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

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

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

- Adoption of the International Existing Building Code; This Code applies to multi-family housing and reduces financial barriers to renovating existing building by allowing greater flexibility in materials used in the renovation;
- The City has exempted impact fees for water and sewer in the core area of the city to reduce the cost of infill housing and other redevelopment efforts;
- The City has exempted the fees for permits to nonprofit builders of affordable housing;
- The City does not require engineering or architectural seals for nonprofit affordable housing developers; The rules and requirements for architectural seals are statutorily mandated by the Oklahoma State Architectural and Registered Interior Designers Act (59 Oklahoma Statutes, 2007, Section 46.1 et seq.). Specifically, Section 46.21b.C.5.e, f exempts from the provisions of the Act referenced above, residential structures no more than two (2) stories in height, including apartments containing no more than thirty-two

(32) dwelling units or guest units per building. The City's building permit checklist includes an item for "Applicable Seals and Certifications" if required, prior to the issuance of a permit. Most assembly use buildings and larger buildings that involve spans of structural members in excess of 30 feet may be required to be designed by an Architect or Engineer licensed in the State of Oklahoma.

- Building permit fees are waived by policy for nonprofit charitable organizations engaged in the construction or remodeling of one or two family dwellings for the purpose of providing housing assistance to low-income persons or households;
- There are no licensing requirements for builders or professionals except in the case of high-rise structures. The State of Oklahoma does not require a license for general contractors; however, electrical, plumbing, mechanical, sign, driveway and fire suppression system permits can only be issued to contractors licensed in the State of Oklahoma and registered with the City of Oklahoma City. These contractors must be licensed by both the State of Oklahoma and The City of Oklahoma City. Instructions for licensing are available on the City's website.

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

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

City Council supported changes to the existing Ordinance by passing a revised Ordinance on January 5, 2015. The revised Ordinance updated protected class definitions by adopting age, familial status and disability as protected classes in City housing protections as recommended by the 2015 Analysis of Impediments. To address the impediments related to outreach and training, City Staff will continue collaborating with community partners such as Neighborhood Housing Services, Legal Aid and Metro Fair Housing, among others. Agencies responsible for providing fair housing trainings have indicated that training events are not well attended. This would seem to indicate a need for an extended marketing effort and/or an improved notification process. Outreach efforts will be re-examined to ensure available resources are being adequately utilized.

The lack of adequate public transportation is a larger City discussion, and is being addressed in the City's

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

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

Discussion

The City of Oklahoma City remains committed to ensuring equal housing opportunity for all persons. Proposed Action Plan activities for the 2017-2018 Third Action Year Plan provide direct funding to the Metropolitan Fair Housing Council for the provision of fair housing training, compliance, and complaint processing functions. Staff will continue to participate in Fair Housing Seminars as part of Fair Housing Month activities, and will continue to monitor affordable housing barriers and provide resources where needed to ensure compliance.

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

In the last year Metro processed 493 potential Fair Housing complaints- a 36% increase over last year. The majority were filed based on discrimination due to disability. The second largest complaint category was familial status. Of all complaints, thirteen (13) were filed with HUD's Office of Fair Housing & Equal Opportunity for Oklahoma City; One complaint based on disability was settled through a HUD Conciliation Agreement. In addition, MFHC collected \$6000 this year for complainants through in-House mediations. These processes raise the awareness of Fair Housing Law.

In addition, MFHC conducted Fair Housing/Fair Lending/Renters Rights Seminars to over 320 participants this year and published 4 quarterly newsletters distributed to approximately two hundred (200) individuals, groups and private and public organizations in the City. City staff also participated in some of these outreach events. These activities speak directly to improving the understanding of and enhance attention to compliance with fair housing law. These important activities will continue in the upcoming year.

Other identified impediments are being addressed by other parts of the City, outside this Action Plan. One of these is zoning, and as a related issue, NIMBYism used to block multi-family development. The City has recently engaged a consulting firm to create a Diagnostic Analysis Plan that will review zoning codes for conformance with the City's new comprehensive plan. This first phase will identify concerns prior to a 1-4 year process to overhaul all code. This process will encompass changes expected to provide some fair housing relief- to include an emphasis on form-based code that will allow multi-family housing to more readily be constructed in areas

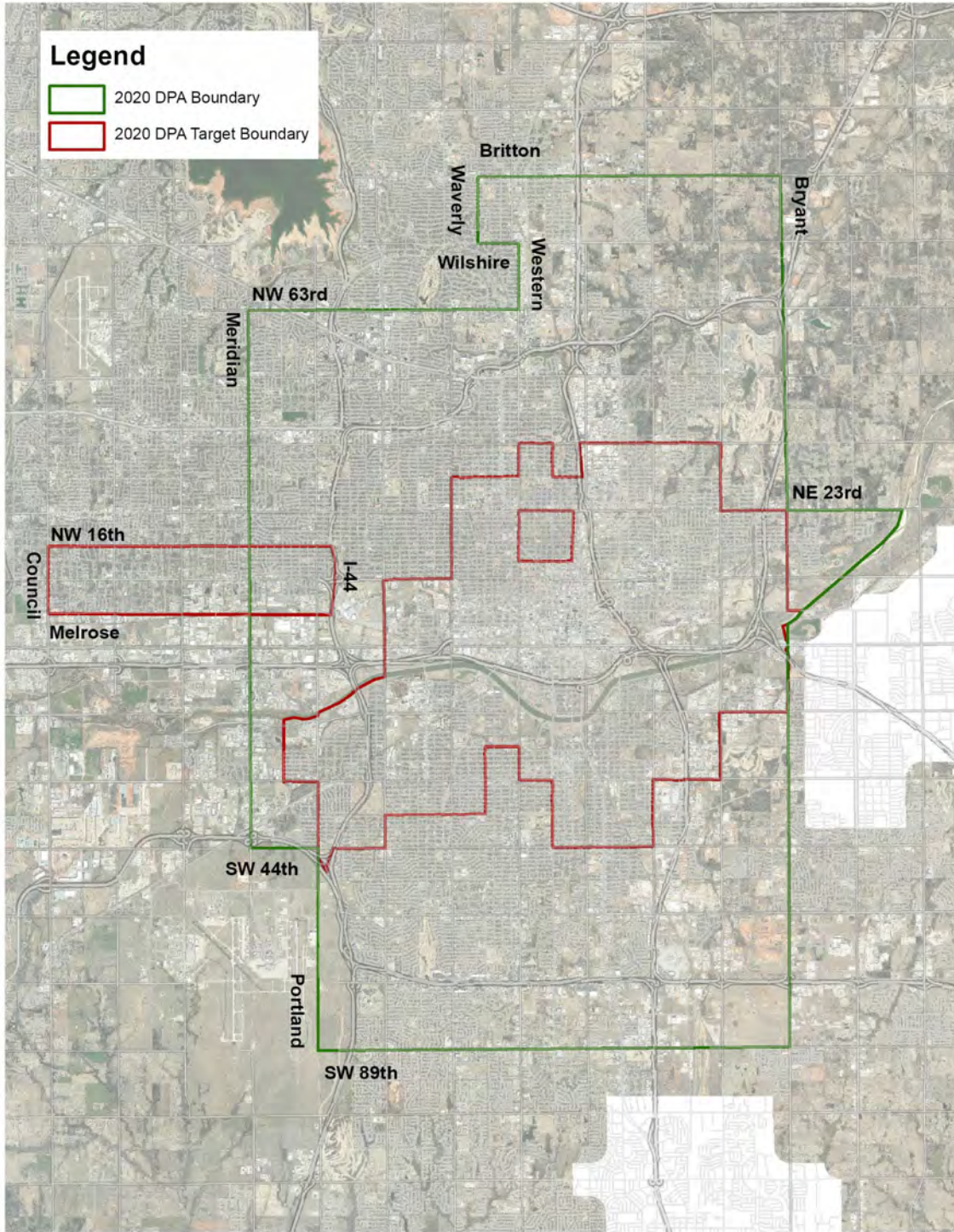
currently prohibited. There will also be review of certain practices, such as street design, that drive up housing costs in certain areas.

The City is also proposing a Bond for vote in the Fall of 2017 that involves adding more sidewalks, transit stops, increase ADA compliance at existing stops, and perform bus system upgrades to advance the public transit system- with a focus on improvements where it is most needed by the citizenry base on review of area incomes and employment centers. The Bond also includes a \$10M set aside for affordable housing- the first time the City has made such a proposal or investments. If passed, City staff and staff of the Alliance for Economic Development, the Oklahoma City Economic Development Trust (OCEDT) and City Council will be involved in funding decisions--policy is being drafted with a focus on supporting mixed-income developments in areas accessible to employment, transit, quality schools and grocery stores for persons making less than 80% AMI.

APPENDIX 5a

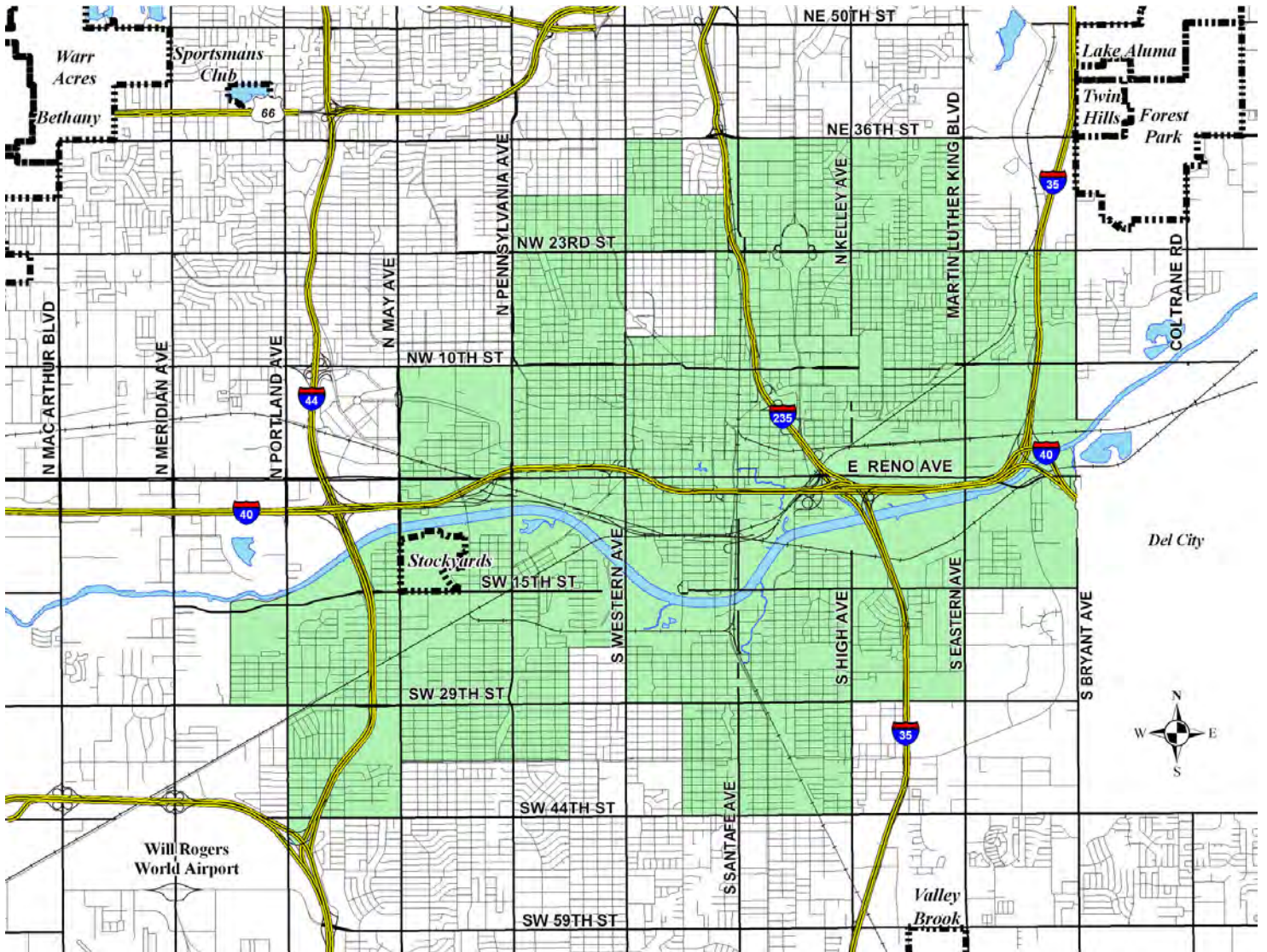
DOWN PAYMENT ASSISTANCE PROGRAM BOUNDARIES

(last revised 2020)



APPENDIX 5b

NEIGHBORHOOD REVITALIZATION STRATEGY AREA



APPENDIX 6

SF-424 AND CERTIFICATIONS (COPIES)

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- Preapplication
 Application
 Changed/Corrected Application

*** 2. Type of Application:**

- New
 Continuation
 Revision

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

*** Other (Specify):**

*** 3. Date Received:**

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

The City of Oklahoma City

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

736005359

*** c. UEI:**

D3MUME8J5T25

d. Address:

*** Street1:**

420 W. Main Street, Suite 920

Street2:

*** City:**

Oklahoma City

County/Parish:

*** State:**

OK: Oklahoma

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

73102-4437

e. Organizational Unit:

Department Name:

Planning Department

Division Name:

Community Development Divison

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

Prefix:

Mr.

*** First Name:**

Chris

Middle Name:

*** Last Name:**

Varga

Suffix:

Title:

Community Development Manager

Organizational Affiliation:

The City of Oklahoma City

*** Telephone Number:**

(405) 297-1639

Fax Number:

(405) 297-3796

*** Email:**

christopher.varga@okc.gov

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

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

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

PY24 Oklahoma City Community Development Block Grant

*** 12. Funding Opportunity Number:**

* Title:

13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

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

Community Development Block Grant Program Activities

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

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

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="5,055,205.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="5,055,205.00"/>

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

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

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

- Yes
- No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

** I AGREE

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

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:

* Date Signed:

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- Preapplication
- Application
- Changed/Corrected Application

*** 2. Type of Application:**

- New
- Continuation
- Revision

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

*** Other (Specify):**

*** 3. Date Received:**

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5a. Federal Entity Identifier:

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Community Development Manager

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*** Telephone Number:**

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Fax Number:

(405) 297-3796

*** Email:**

christopher.varga@okc.gov

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

*** Other (specify):**

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

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

PY24 Oklahoma City HOME Investment Partnerships Program

*** 12. Funding Opportunity Number:**

*** Title:**

13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

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

HOME Investment Partnerships Program Activities

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

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

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="2,236,659.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="2,236,659.00"/>

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If "Yes", provide explanation and attach

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Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:

* Date Signed:

Application for Federal Assistance SF-424

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- Changed/Corrected Application

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- New
- Continuation
- Revision

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*** Other (Specify):**

*** 3. Date Received:**

4. Applicant Identifier:

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*** c. UEI:**

d. Address:

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Street2:

*** City:**

County/Parish:

*** State:**

Province:

*** Country:**

*** Zip / Postal Code:**

e. Organizational Unit:

Department Name:

Division Name:

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

Prefix:

*** First Name:**

Middle Name:

*** Last Name:**

Suffix:

Title:

Organizational Affiliation:

*** Telephone Number:**

Fax Number:

*** Email:**

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

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

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.231

CFDA Title:

PY24 Oklahoma City Emergency Solutions Grant

*** 12. Funding Opportunity Number:**

* Title:

13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

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

Emergency Solutions Grant Program Activities

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

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

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="431,333.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="431,333.00"/>

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- Continuation
- Revision

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

*** Other (Specify):**

*** 3. Date Received:**

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

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

*** c. UEI:**

d. Address:

*** Street1:**

Street2:

*** City:**

County/Parish:

*** State:**

Province:

*** Country:**

*** Zip / Postal Code:**

e. Organizational Unit:

Department Name:

Division Name:

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

Prefix:

*** First Name:**

Middle Name:

*** Last Name:**

Suffix:

Title:

Organizational Affiliation:

*** Telephone Number:**

Fax Number:

*** Email:**

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

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

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.241

CFDA Title:

PY24 Oklahoma City Housing Opportunities for Persons With AIDS

*** 12. Funding Opportunity Number:**

* Title:

13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

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

Housing Opportunities for Persons With AIDS (HOPWA) Program Activities

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

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

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="1,399,461.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="1,399,461.00"/>

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

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

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

- Yes
- No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

** I AGREE

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

Authorized Representative:

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

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:

* Date Signed:

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

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

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

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

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

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

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
[Redacted Signature]	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
The City of Oklahoma City	7/5/24

CERTIFICATIONS

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

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

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

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

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

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

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

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

Signature of Authorized Official

Date

Mayor

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

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

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

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

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

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

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2024, 2025, and 2026 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

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

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

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

Excessive Force -- It has adopted and is enforcing:

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

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

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

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

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

Signature of Authorized Official

Date

Mayor

OPTIONAL Community Development Block Grant Certification

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

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

Signature of Authorized Official

Date

Mayor

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

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

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

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

Signature of Authorized Official

Date

Mayor

Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

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

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

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

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

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

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

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

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

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

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

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

Signature of Authorized Official

Date

Mayor

Housing Opportunities for Persons With AIDS Certifications

The HOPWA grantee certifies that:

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

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

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

Signature of Authorized Official

Date

Mayor

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

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

CITY OF OKLAHOMA CITY

Unique Entity ID D3MUME8J5T25	CAGE / NCAGE 38LH1	Purpose of Registration Federal Assistance Awards Only
Registration Status Active Registration	Expiration Date Feb 11, 2025	
Physical Address 420 W Main ST Oklahoma City, Oklahoma 73102-4437 United States	Mailing Address 200 N. Walker Oklahoma City, Oklahoma 73102-4435 United States	

Business Information

Doing Business as (blank)	Division Name Planning Dept. - Economic Development	Division Number (blank)
Congressional District Oklahoma 05	State / Country of Incorporation (blank) / (blank)	URL (blank)

Registration Dates

Activation Date Feb 14, 2024	Submission Date Feb 12, 2024	Initial Registration Date Apr 12, 2005
--	--	--

Entity Dates

Entity Start Date Apr 22, 1889	Fiscal Year End Close Date Jun 30
--	---

Immediate Owner

CAGE (blank)	Legal Business Name (blank)
------------------------	---------------------------------------

Highest Level Owner

CAGE (blank)	Legal Business Name (blank)
------------------------	---------------------------------------

Executive Compensation

Registrants in the System for Award Management (SAM) respond to the Executive Compensation questions in accordance with Section 6202 of P.L. 110-252, amending the Federal Funding Accountability and Transparency Act (P.L. 109-282). This information is not displayed in SAM. It is sent to USAspending.gov for display in association with an eligible award. Maintaining an active registration in SAM demonstrates the registrant responded to the questions.

Proceedings Questions

Registrants in the System for Award Management (SAM.gov) respond to proceedings questions in accordance with FAR 52.209-7, FAR 52.209-9, or 2. C.F.R. 200 Appendix XII. Their responses are displayed in the responsibility/qualification section of SAM.gov. Maintaining an active registration in SAM.gov demonstrates the registrant responded to the proceedings questions.

Exclusion Summary

Active Exclusions Records?

No

SAM Search Authorization

I authorize my entity's non-sensitive information to be displayed in SAM public search results:

Yes

Entity Types

Business Types

Entity Structure U.S. Government Entity	Entity Type US Local Government	Organization Factors (blank)
---	---	--

Socio-Economic Types

Check the registrant's Reqs & Certs, if present, under FAR 52.212-3 or FAR 52.219-1 to determine if the entity is an SBA-certified HUBZone small business concern. Additional small business information may be found in the SBA's Dynamic Small Business Search if the entity completed the SBA supplemental pages during registration.

Government Types

U.S. Local Government
City

Financial Information

Accepts Credit Card Payments
No

Debt Subject To Offset
No

EFT Indicator
0000

CAGE Code
38LH1

Points of Contact

Electronic Business

⌘
Kimberly Watson

420 W. MAIN, Suite 940
Oklahoma City, Oklahoma 73102
United States

Kelly Parker

701 Colcord DR
Oklahoma City, Oklahoma 73102
United States

Government Business

⌘
CHRIS VARGA

420 W. MAIN, Suite 920
Oklahoma City, Oklahoma 73102
United States

Matthew Gabrielson

420 W Main ST
Suite 940
Oklahoma City, Oklahoma 73102
United States

Service Classifications

NAICS Codes

Primary	NAICS Codes	NAICS Title
---------	-------------	-------------

Disaster Response

This entity does not appear in the disaster response registry.

APPENDIX 7
CITY COUNCIL RESOLUTION



MEMORANDUM

The City of OKLAHOMA CITY

Council Agenda
Item No. TBD
7/2/2024

TO: Mayor and City Council

FROM: Craig Freeman, City Manager

1. Public Hearing.
2. Resolution approving the Fiscal Year 2024-25 Fifth Action Year Plan approving new formula grant funding allocations for the following: Community Development Block Grant \$5,055,205; Home Investment Partnerships Program \$2,236,659; Emergency solutions Grant Program \$431,333; and Housing Opportunities for Persons with AIDS \$1,399,461; Providing for carry forward and allocation of \$1,673,456 in previously unobligated FY 2023-24 Community Development Block Grant funds to include recaptured funds and program income, and \$1,176,560 in funds obligated for program activities but not yet expended at the fiscal year end; Providing for carry forward and allocation of \$5,661,798 in previously unobligated FY 2023-24 Home Investment Partnerships Program funds to include recaptured funds and program income, and \$2,085,220 in funds obligated for program activities that have not yet expended at the fiscal year end; Approving submission of SF-424 application documents and certifications to U.S. Department of Housing and Urban Development (HUD) grant agreements; Approving operating agreements with funding recipients identified in Attachment "A" of this Resolution, including the Community Action Agency programs, Community Health Centers, Inc., Court Appointed Special Advocates of Oklahoma county (CASA), Oklahoma City Urban Renewal Authority, Oklahoma City Housing Authority (including a Memorandum Of Understanding for the public housing modernization program), Alpha Community Foundation of Oklahoma, NewView Oklahoma, Inc., Metropolitan Fair Housing Council, and Central Oklahoma Transportation and Parking Authority (COTPA); Providing that said Operating Agreements are brought back to Council for Ratification; Providing that interest earnings on unexpended section 108 loan accounts shall be used for debt service on section 108 loans; and authorizing the Mayor to execute all documents necessary to implement the new formula funding allocations. (All Wards)

Purpose The first action for this Council item, the public hearing, affords citizens an opportunity to comment on the Plan before the Council takes action. The Resolution approving the FY 2024-25 Fifth Action Year Plan provides for the allocation of grant funds to meet the priorities of the Consolidated Plan for FY 2020-24 and serves as the application for the CDBG, HOME, ESG and HOPWA formula grant programs administered by the U.S. Department of Housing and Urban Development (HUD).

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

activities during a program year. The Action Year budget follows the assessment of housing needs, non-homeless special needs, and non-housing community development needs identified in the Five-Year Consolidated Plan; and allocates resources to priorities based on the availability of funds.

Development of the proposed Fiscal Year 2024-25 Fifth Action Year Plan was initiated by the Planning Department by convening two (2) public meetings in January 2024 to solicit citizen input on housing and community development needs. The public meetings were held in person at the Ralph Ellison and Capitol Hill libraries. The Citizens Committee for Community Development (“Citizens Committee”) convened an additional in-person public meeting on June 4, 2024, at which time Community Development Staff discussed the strategies and objectives, programs, and funding levels for the Fifth Action Year Plan. The Citizen’s Committee accepted the funding recommendations and strategic priorities and endorsed the item for presentation to City Council for final approval.

To comply with programmatic public participation requirements, a 30-day comment period was initiated by publication in *The Oklahoman* on May 31, 2024. Once adopted by City Council, the final plan must be submitted to the HUD Regional Office on or before July 5, 2024, unless otherwise extended by HUD. Recommended funding allocations for the CDBG and HOME programs appear in Attachment “A” of the Resolution. ESG and HOPWA funds will be allocated through the Continuum of Care Committee based on a Request for Proposal (RFP) process, and the Committee’s funding recommendations will be forwarded to City Council for final approval.

In addition to approving the Plan and funding allocations, the Resolution authorizes the Mayor to sign the HUD Request for Release of Funds and Certification (RROF) forms on an ongoing basis throughout the year. A RROF must be completed prior to expenditure of funds for a HUD-assisted project that requires an Environmental Assessment or Environmental Impact Statement but is not a City commitment or guarantee for use of HUD funding. Rather, submission is required as part of an administrative process (defined in 24 CFR Part 58) to determine the environmental impact of a potential HUD-assisted project and would be completed prior to any related Council action. The Resolution provides authorization for City Housing and Community Development staff assigned environmental review responsibilities to sign applicable determinations for exempt and categorically excluded activities under 24 CFR part 58, which do not require a RROF. Additionally, the City is required by regulation to complete the environmental review process and RROF documents for the Oklahoma City Housing Authority (OCHA) whenever they use federal dollars - whether passed through the City to OCHA as a subrecipient, or whether those funds go directly from federal agencies to OCHA. This Resolution authorizes the Mayor’s signature on those items as well.

Attachment A to the Resolution summarizes recommended allocations for programs and projects for the Fifth Action Year. Funds identified as “to be carried forward” have been projected based on the current project spending rates and

available information; these numbers will fluctuate as spending continues through June 30, 2024 and final numbers will not be available prior to Plan submission to HUD on July 5th. For these projects, the final carry forward balance may cause a need to adjust new allocated dollars accordingly to provide up to the full project funding for the upcoming year. As an example, the OKC Abandoned Building Program has a total FY 2024-25 allocation recommendation of \$250,000, with expectation of \$150,000 to be carried forward from the current FY 2023-24 program year. The intention is to fund the activity for a total of \$250,000 in FY 2024-25. If there is only \$75,000 left to carry forward, the new FY 2024-25 allocation would be increased from \$0.00 to \$75,000 to offset the deficit. Alternatively, if funds carried forward exceed the projected \$150,000, the \$100,000 proposed allocation from previously unobligated funds will be decreased proportionately.

The allocation of formula grant funds to program activities will be paid through the individual grants for which an application is authorized in the Resolution. The funds will be set up in the new fiscal year categories when the grant agreements are approved and returned to The City by HUD. Subsequent adjustments necessitated by changes in projected carry-forward and recaptured balances and/or changes to the announced formula grant funding by HUD will be made to the uncommitted General Public Facilities line item for Community Development Block Grant activities, and to the uncommitted funds in the Affordable Housing Development Program line item for the HOME Investment Partnerships Program.

Source of Funds GRANTS MANAGEMENT– DEPT OF HSG & URB DEVEL-RSTR
 -CDBG ENTITLEMENT – B-24-MC-40-0003 (1906-2408000-G80432)

 GRANTS MANAGEMENT– DEPT OF HSG & URB DEVEL-RSTR
 -HOME – M-24-MC-40-0203 (1906-2408030-G80432)

 GRANTS MANAGEMENT– DEPT OF HSG & URB DEVEL-RSTR
 -EMERGENCY SHELTER – E24-MC-40-0003 (1906-2408010-G80432)

 GRANTS MANAGEMENT– DEPT OF HSG & URB DEVEL-RSTR
 -HOPWA – OKH24-F001 (1906-2408035-G80432)

Review Planning Department

Recommendation Resolution be adopted

RESOLUTION

RESOLUTION APPROVING THE FISCAL YEAR 2024-25 FIFTH ACTION YEAR PLAN, APPROVING NEW FORMULA GRANT FUNDING ALLOCATIONS FOR THE FOLLOWING: COMMUNITY DEVELOPMENT BLOCK GRANT \$5,055,205; HOME INVESTMENT PARTNERSHIPS PROGRAM \$2,236,659; EMERGENCY SOLUTIONS GRANT PROGRAM \$431,333; AND HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS \$1,399,461; PROVIDING FOR CARRY FORWARD AND ALLOCATION OF \$1,673,456 IN PREVIOUSLY UNOBLIGATED FY 2023-24 COMMUNITY DEVELOPMENT BLOCK GRANT FUNDS TO INCLUDE RECAPTURED FUNDS AND PROGRAM INCOME, AND \$1,176,560 IN FUNDS OBLIGATED FOR PROGRAM ACTIVITIES BUT NOT YET EXPENDED AT THE FISCAL YEAR END; PROVIDING FOR CARRY FORWARD AND ALLOCATION OF \$5,661,798 IN PREVIOUSLY UNOBLIGATED FY 2023-24 HOME INVESTMENT PARTNERSHIPS PROGRAM FUNDS TO INCLUDE RECAPTURED FUNDS AND PROGRAM INCOME, AND \$2,085,220 IN FUNDS OBLIGATED FOR PROGRAM ACTIVITIES THAT HAVE NOT YET EXPENDED AT THE FISCAL YEAR END; APPROVING SUBMISSION OF SF-424 APPLICATION DOCUMENTS AND CERTIFICATIONS TO U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD) GRANT AGREEMENTS; APPROVING OPERATING AGREEMENTS WITH FUNDING RECIPIENTS IDENTIFIED IN ATTACHMENT "A" OF THIS RESOLUTION, INCLUDING THE COMMUNITY ACTION AGENCY PROGRAMS, COMMUNITY HEALTH CENTERS, INC., COURT APPOINTED SPECIAL ADVOCATES OF OKLAHOMA COUNTY (CASA), OKLAHOMA CITY URBAN RENEWAL AUTHORITY, OKLAHOMA CITY HOUSING AUTHORITY (INCLUDING A MEMORANDUM OF UNDERSTANDING FOR THE PUBLIC HOUSING MODERNIZATION PROGRAM), ALPHA COMMUNITY FOUNDATION OF OKLAHOMA, NEWVIEW OKLAHOMA, INC, METROPOLITAN FAIR HOUSING COUNCIL, AND CENTRAL OKLAHOMA TRANSPORTATION AND PARKING AUTHORITY (COTPA); PROVIDING THAT SAID OPERATING AGREEMENTS ARE BROUGHT BACK TO COUNCIL FOR RATIFICATION; PROVIDING THAT INTEREST EARNINGS ON UNEXPENDED SECTION 108 LOAN ACCOUNTS SHALL BE USED FOR DEBT SERVICE ON SECTION 108 LOANS; AND AUTHORIZING THE MAYOR TO EXECUTE ALL DOCUMENTS NECESSARY TO IMPLEMENT THE NEW FORMULA FUNDING ALLOCATIONS.

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

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

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

WHEREAS, the City desires to execute operating agreements and memorandums of understanding to implement the direct funding allocations to sub-grantees named in Attachment “A”; and

WHEREAS, the City is required to perform environmental review per 24 CFR Part 58 on all federally funded projects, and is also required to do so on behalf of the Oklahoma City Housing Authority (OCHA) for use of federal funds whether those are received directly by OCHA or passed through the City as a subrecipient; and

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

WHEREAS, Fiscal Year 2024-25 will be the first year of a three-year averaging period to achieve the requirement to spend 70% of CDBG funds to benefit low/moderate income persons in the NRSA area; and

WHEREAS, the final FY 2024-25 formula grant allocations from HUD have been announced, and required federal public participation requirements have been adhered to;

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

1. The proposed Fiscal Year 2024-25 Fifth Action Year Plan is adopted for the period July 1, 2024, through June 30, 2025.
2. The allocations of funds for the CDBG, HOME, ESG and HOPWA programs, program income, unobligated funds, and recaptured funds from prior years as reflected in the documents attached hereto and reflected in the FY 2024-25 Fifth Action Year Plan are approved.
3. Subsequent adjustments to CDBG funds due to changes in projected balances recaptured and/or carried forward, and/or changes to formula grant funds announced by HUD will be made proportionately to uncommitted General Public Facilities line items.
4. Subsequent adjustments to the HOME program funds due to changes in projected balances recaptured and/or carried forward, and/or changes to formula grant funds announced by HUD, will be made to the uncommitted Affordable Housing Development Program line item.
5. The Mayor is hereby authorized to execute all SF-424 application documents, to make the required certifications related to such documents, and to execute HUD grant agreements related to the programs listed herein.
6. The Mayor is authorized to execute operating agreements with sub-grantees to whom funds have been allocated in Attachment “A” that include the Community Action Agency programs, Community Health Centers, Inc., Court Appointed Special Advocates of Oklahoma County, Oklahoma City Urban Renewal Authority, Oklahoma City Housing

Authority (including an MOU for the public housing modernization program), Alpha Community Foundation of Oklahoma, NewView Oklahoma, Inc, Metropolitan Fair Housing Council, and Central Oklahoma Transportation and Parking Authority.

7. The Mayor is authorized to sign HUD Form 7015.15 Requests for Release of Funds forms, which includes certification of environmental compliance required by 24 CFR Part 58 for projects that may be funded with HUD funds, including any required for OCHA projects.
8. The Mayor and/or his designee, the Planning Department's Housing and Community Development Manager or management staff overseeing environmental reviews are authorized to sign all applicable Environmental Review determinations and statutory checklists for 'exempt', 'categorically excluded, not subject to', and 'categorically excluded, subject to' activities under 24 CFR Part 58 which do not require HUD Form 7015.15 Request for Release of Funds during the program year.
9. The Mayor and/or his designee, the Housing and Community Development Division manager in The City of Oklahoma City Planning Department, are authorized to sign documents certifying that a project is in conformance with the Consolidated Plan.

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

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

ADOPTED by the Council and **APPROVED** by the Mayor of The City of Oklahoma City this ____ day of _____, 2024.

ATTEST: [SEAL]

CITY CLERK

MAYOR

Reviewed For Form And Legality.

Assistant Municipal Counselor

**ATTACHMENT “A”
FY 2024-25 FUNDING RECOMMENDATIONS**

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)

Sources of Funds

Community Development Block Grant 2024-25 HUD Allocation	\$5,055,205
2023-24 Obligated/unexpended funds carried forward to FY 2024-25	\$1,176,560
Redistribution of previously unallocated/unobligated FY 2023-24 funds	\$1,673,456
Total Sources of CDBG Funds	\$7,905,221

HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME)

Sources of Funds

Home Investment Partnerships Program 2024-25 HUD Allocation	\$2,236,659
2023-24 Obligated/unexpended funds carried forward to FY 2024-25	\$2,085,226
Redistribution of previously unallocated/unobligated FY 2023-24 funds	\$5,661,797
Total Sources of HOME Funds	\$9,983, 682

EMERGENCY SOLUTIONS GRANT PROGRAM (ESG)

ESG funds allocated by HUD for 2024-25	431,333
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HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS (HOPWA)

HOPWA funds allocated by HUD for 2024-25	\$1,399,461
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ALLOCATION OF FUNDS – FY 2024-25

CDBG:

Decent Housing

JPNA/Paseo Joint Venture-Walnut Dev. Infrastructure*	\$268,276
Oklahoma City Housing Assistance Program (to include the listed activities):	\$1,875,000
• Housing Exterior Maintenance Project Activity (\$1.2 million)*	
• Program Delivery Activity (\$675,000)	
Oklahoma City Housing Authority (OCHA)	\$235,000
Community Action Agency (CAA) Emergency Home Repair	\$600,000
Pest Inspection and Treatment Program	\$24,000

Slum and Blight Remediation

Urban Renewal Authority Completions	\$788,880
OKC Abandoned Building Program-Spot Blight*	\$250,000

Public Service Activities

Strong Neighborhoods Initiative-PS	\$420,000
COTPA (Embarck) Share-A-Fare	\$105,000
Community Health Services, Inc.-Healing Hands	\$65,000
Court Appointed Special Advocates	\$40,000

Public Facilities Activities

Strong Neighborhoods Initiative-PF <i>(Includes up to \$136,000 for program delivery)</i>	\$1,200,000
Alpha Community Foundation-Garden Oaks Community Center	\$200,000
Community Development Program-PF Undefined	\$383,025

Economic Opportunity

Section 108 Repayment Fund/Contingency	\$100,000
CAA Small Business	\$40,000
NewView Oklahoma-Job Retention (Water Line Extension)	\$300,000

Administration

Metropolitan Fair Housing Council	\$93,000
Planning	\$45,000
Administration	\$873,040
TOTAL ALLOCATION OF CDBG FUNDS	\$7,905,221

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

- Oklahoma City Housing Authority
- Pest Inspection and Treatment program
- COTPA Share-A-Fare Program
- Community Health Services-Healing Hands
- CASA – Court appointed Special Advocates
- Unallocated Public Facilities
- Metropolitan Fair Housing Council
- CAA Small Business Services
- CAA Emergency Repairs
- Urban Renewal Authority Completions
- Metropolitan Fair Housing
- Planning
- Administration

HOME:

Down Payment Assistance Program	\$1,042,574
Whole House Rehabilitation Program (40% targeted to SNI)	\$750,000
Affordable Housing Development Program (AHDP)- Pending Allocation	\$2,385,290
AHDP -Hillcrest Green Apts.	\$660,000
AHDP-OCHA Vita Nova	\$1,200,000
AHDP-Progress OKC SF Homes	\$254,729
AHDP- Creston Park Phase I	\$800,000
Community Housing Development Organization (CHDO) Set-aside (15%)	\$335,499
CHDO- Unallocated	\$459,316
CHDO- Positively Paseo	\$755,550
CHDO- Neighborhood Housing Services	\$340,000
CHDO- Jefferson Park Neighbors Association	\$742,373
Planning and Administration	\$258,351
TOTAL ALLOCATION OF HOME FUNDS	\$9,983,682

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

- *NONE*

** For CDBG and HOME projects with funds to be carried forward, the final balance unspent as of June 30, 2024, may cause a need to adjust 2024-25 allocated dollars accordingly to provide the full project funding for the FY 2024-25 program year. For example, the CDBG OKC Abandoned Building Program has a total allocation recommendation of \$250,000 with expectation of \$150,000 to be carried forward from the current FY 2023-24 program year. The intention is to fund the program for a total of \$250,000 in FY 2024-25. If there is only \$75,000 left to carry forward, the new FY 2024-25 allocation would be increased from \$0.00 to \$75,000 to offset the deficit. Alternatively, if the funds carried forward exceed the projected \$150,000, then the \$100,000 proposed allocation from previously unobligated funds will be decreased proportionately.*

EMERGENCY SOLUTIONS GRANT (ESG): \$431,333

ESG funds are awarded through an Open Solicitation process. The Continuum of Care Committee will review proposals and make recommendations for funding which will be presented to the City Council for final approval. All ESG funds will be allocated through this process to non-profit organizations providing housing assistance and services to the homeless.

HOUSING OPPORTUNITIES FOR PERSONS WITH HIV/AIDS (HOPWA): \$1,399,461

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

Oklahoma City directly administers HOPWA funds through a contract with a local nonprofit service provider who conducts outreach and distributes funds to provide services to persons with HIV/AIDS in the Eligible Statistical Metropolitan Area (ESMA). The ESMA includes seven counties serving the needs of persons with HIV/AIDS and their families.

Program Income

Program income for the 2024-25 Fifth Action Plan Year will be allocated as follows:

1. Program income generated from Section 108 Loan investment and repayment accounts will be used to pay Section 108 principal and interest.
2. If any funding rebates are provided by material suppliers resulting from Oklahoma City Housing Assistance Program CDBG activities, those funds will be allocated to the Oklahoma City Housing Assistance Exterior Maintenance Program to assist with funding additional projects.
3. Subject to 20% regulatory caps, CDBG program income may be used to fund administrative expenses or create additional administrative capacity during the program year in which it is realized.
4. Program income that is generated by the Oklahoma City Urban Renewal Authority (OCURA) activities during the 2024-25 program year *may be* reallocated back to OCURA for use in CDBG eligible activities.
5. In accordance with CPD Notice 97-9, III.J., HOME Program Income that is deposited to the City's letter of credit, and that creates additional administrative capacity, may be used by the City for HOME administrative expenses incurred during the Action Year, and excess administrative capacity may be carried forward to subsequent years.
6. Unallocated CHDO funds may be used as loan funds available to CHDOs or reallocated to CHDO set-aside activities as needed to ensure timely allocation and efficient use of these resources in the production of affordable units.

APPENDIX 8

ESG POLICIES AND PROCEDURES



Oklahoma City Continuum of Care

CoC/ESG

Written Standards

OVERVIEW

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

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

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

CONTINUUM OF CARE PURPOSE

The primary purpose of the Continuum of Care is to:

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

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

FUNDING AWARD PROCESS OVERVIEW

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

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

UNIVERSAL STANDARDS

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

PARTICIPANT ELIGIBILITY

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

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

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

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

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

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

COORDINATED INTAKE AND REFERRAL SYSTEM

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

EMERGENCY TRANSFER PLAN

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

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

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

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

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

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

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

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

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

HOUSING FIRST

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

- Housing is not contingent on compliance with services. Participants are provided with a standard one year lease agreement. The lease agreement can only be terminated in accordance with the State of Oklahoma Residential Landlord and Tenant Acts.
- Participants are provided with services and supports to help maintain housing and prevent eviction.
- There is no requirement for sobriety prior to being offered housing and admission should not be conditioned on credit or background checks. Criminal backgrounds will be considered only to the extent necessary to protect safety and well-being.
- Participants shall be given choice in their housing subject to program limitations.
- Participants are not required to participate in services but providers are required to persistently and consistently seek to engage participants.
- Providers are encouraged to support staff in implementing evidence based practices that support housing first.

HMIS

All CoC and ESG recipients, except for victim service providers must actively utilize the Homeless Management Information System (HMIS), to enter data on individuals served and assistance provided under ESG and CoC. Victim service providers shall actively utilize a comparable data system that meets HUD's standards (24 CFR 576.106). The HMIS database is designed to record and store client-level data, including the characteristics and service needs of people who are homeless or at-risk of homelessness. Utilization of the HMIS database will help provide consistent and accurate snapshot of populations served through various programs.

Agencies utilizing the HMIS database are expected to comply with the data quality standards. Client level data should be entered into HMIS within 72 hours of client entry or exit.

INCOME DETERMINATION

Minimum standards for determination of an individual or family's annual income consist of calculating income in compliance with 24 CFR 5.609. Individuals and families assisted under ESG are required to have annual incomes at or below 30% of Area Median. There are no income limits of CoC assistance but in all instances in which participants are charged rents or occupancy charges, the amount charged must be based on participant's verified annual income for all sources. In verifying income, ESG and CoC funded providers are required to obtain third party verification whenever possible. Self-certification or verification is to be accepted only when all efforts have been made to obtain third party verification have not produced results.

COORDINATION WITH MAINSTREAM AND TARGETED HOMELESS PROVIDERS

CoC and ESG sub-recipients are expected to maximize the use of available Federal, State and local mainstream resources to ensure the long-term stability of program participants. Providers shall actively seek to engage partnerships with programs and services that are targeted to address homelessness and poverty within their communities.

DISCHARGE PLANNING

Each Oklahoma City CoC services provider must develop and implement, to the maximum extent practicable, policies and protocols for the discharge of persons from public funded institutions and systems of care (such as health care facilities, foster care, or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons.

EDUCATIONAL ASSURANCES

CoC and ESG sub-recipients are expected to collaborate with local education authorities to assist in the identification of individuals and families who become or remain homeless and are informed of the eligibility for services under subtitle B of the title VII of the McKinney-Vento Act. Service providers must have written policies in place which ensure that homeless individuals and families who become homeless are informed of their eligibility for and receive access to educational services. Agency policies

should include how homeless families with children will be informed of and referred to the school district's homeless liaison. This includes demonstrating that providers establish policies to ensure all children are enrolled in early childhood programs or in a school and connected to appropriate services in the community. Providers shall collaborate with the local school districts and early childhood education providers to identify homeless households with children to ensure they understand their eligibility for educational services. Such policies should also include information for all homeless individuals and families regarding local technical schools and universities which may offer programs and assistance for persons who are homeless. These policies must have identified a staff person responsible for ensuring that children being served are enrolled in school and connected to appropriate services.

INVOLUNTARY FAMILY SEPERATION

Maintaining family unit is important when homeless households with children under the age of 18 enter homeless shelters or housing. Oklahoma City CoC expects providers to ensure homeless households with children under the age of 18 are not denied admission and are not separated. In addition, a broad definition of family should be used that allows for female headed, male-headed, two parent, same sex parent, LGBT parent, and extended families be served together with their children.

TERMINATION OF ASSISTANCE

All participants must be given a copy of the program rules and termination process before the participant receives services. If a program violation occurs and the provider terminates assistance as a result, the termination shall follow an established process that recognizes the rights of the individuals affected. Termination shall only occur in the most severe cases after other remedies have been attempted. Individuals and families facing program termination should be given written notice clearly stating the reasons for termination. They must also be given the opportunity to present objections to the decision and to have representation. Any appeal of a decision shall be heard by an individual different from and not subordinated to the initial decision maker. Prompt written notice of the final decision on the appeal must be provided. Termination must not bar the provider from providing later additional assistance to the same family or individual.

OCCUPANCY STANDARDS

All housing units, including scattered site programs owned and managed by private landlords, must meet applicable state or local government health and safety codes and have current certificate of occupancy for the current use and meet or exceed the following minimum standards:

- Building must be structurally sound to protect from the elements and not pose any threat to health and safety of the residents
- Must be accessible in accordance with Section 504 of the Rehabilitation Act, the Fair Housing Act and the Americans with Disabilities Act where applicable
- Must provide an acceptable place to sleep and adequate space and security for themselves and their belongings
- Each room must have a natural or mechanical means of ventilation

- Unit must have at least one bedroom or living/sleeping room for each two persons
- Children of the opposite sex, other than very young children, are not required to occupy the same bedroom or living/sleeping room.

LEAD-BASED PAINT

Minimum standards for all program participant-occupied housing consist of compliance with the lead-based paint remediation and disclosure requirements identified in 24 CFR 576.403.

HOMELESS PARTICIPATION

Each funded provider of CoC or ESG assistance must develop policies to provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or equivalent policymaking entity of the provider (24 CFR 578.759(g)). To the maximum extent possible, the provider shall involve homeless individuals and families in paid or volunteer work on the ESG or CoC funded facilities, in providing services under ESG or CoC and in providing services for occupants of ESG or CoC funded facilities (24 CFR 576.405 and 578.75).

FAITH-BASED ACTIVITIES

Providers receiving CoC or ESG funding shall not engage in inherently religious activities as part of the CoC or ESG funded programs or services. Such activities must be offered separately from CoC or ESG funded programs and services and participation must be voluntary. A religious organization receiving CoC or ESG funding retains independence from government and may continue with its mission provided that CoC and ESG funds are not used to support inherently religious activities. An organization shall not discriminate against a participant or prospective participant based on religion or religious beliefs.

NON-DISCRIMINATION

All CoC and ESG service providers must have written non-discrimination policies in place. These policies must outline actions to be taken to ensure outreach to homeless persons with the greatest risk of remaining homeless, and compliance with all federal statutes. Service providers should ensure they are using appropriate, inclusive language in communications, publications, training, personnel handbooks and other policy documents that affirms the agency's commitment to serving all eligible clients in adherence with the Equal Access Rule. Oklahoma City CoC requires services providers to practice a person-centered model that incorporates participant choice and inclusion of all homeless subpopulations present in Oklahoma City, including homeless veterans, youth, and families with children, individual adults, seniors, victims of domestic violence, Lesbian, Gay, Bisexual, Transgender, Queer or Questioning, and Intersex individuals and families. All CoC and ESG funded service providers must ensure that all people have fair and equal access to the coordinated entry process and all forms of assistance regardless of race, ethnicity, national origin, age, sex, familial status, religious preference, disability, type or amount of disability, gender identity, perceived gender identity, marital status, sexual

orientation, or perceived sexual orientation. All CoC and ESG funded service providers must ensure placement and accommodations are made in accordance with an individual's gender identity.

PROGRAM INCOME

Program income earned during the project period shall be retained and used to finance the non-federal share of the project or program. Records of the receipt and use of program income shall be retained. Program income may be used to meet matching funding requirements.

RECORDKEEPING

Program participant records shall include written:

- Determination and certification that the program participant met the criteria for being homeless or at risk of homelessness and that an effort was made to obtain written third-party verification.
- Determination and certification that the program participant was eligible for the particular services and/or financial assistance.
- Determination and certification that the program participant lacked sufficient resources and support networks to provide the assistance.
- Determination and certification that the program participant met income requirements and that an effort was made to obtain written third-party verification. This includes annual documentation of income for each participant who receives housing assistance where rent is paid by the program participant.
- Determination and certification that only households served through permanent supportive housing meet HUD's requirements of having a family member be a person with disabilities. (CoC Only)
- Identification of the specific services and financial assistance amounts that were provided to the program participant.
- When applicable, verification that services were terminated in compliance with the written standards.
- Copies of written leases and rental agreements, documentation of payments made, including dates of occupancy, and compliance with fair market rents, rent reasonableness and utility allowance requirements.
- Determination and verification that the housing unit met HUD's habitability and lead-based paint standards.
- Copy of individualized housing stability plan.
- Notes verifying case management services were provided at least monthly, until exempt from this requirement.
- Notes verifying program participants' eligibility was re-evaluated at least every 3 months for homelessness prevention services or at least annually for rapid rehousing services. (ESG Only)
- Notes verifying program participant was assisted to obtain necessary mainstream and other resources.

Program policies and procedures shall indicate:

- Services are coordinated with other homeless assistance/prevention programs and mainstream services and assistance programs.
- Compliance with HUD's (24 CFR 576 and 578) requirements for:

1. Shelter and housing standards
 2. Conflict of Interest
 3. Homeless participation
 4. Faith-based activity
 5. Nondiscrimination, equal opportunity and affirmative outreach
 6. Uniform administrative rules
 7. Lobbying and disclosure
 8. Displacement, relocation and acquisition
 9. Procurement
- Program participant records are kept secure and confidential.
 - Participation in HMIS.

Financial records shall include:

- Supportive documentation for all costs charged to the ESG or CoC grant.
- Documentation showing ESG or CoC funds were spent on allowable costs in accordance with the requirements for eligible activities and costs principles.
- Documentation of the receipt and use of program income.
- Documentation of the receipt and use of matching funds.
- Copies of procurement contracts.

CONFIDENTIALITY

All records containing protected identifying information of any individual or family who applies for and/or receives Continuum of Care assistance will be kept secure and confidential. The address or location of any family violence project assisted with Continuum of Care funds will not be made public, except with written authorization of the person responsible for the operation of the project. The address or location of any housing of a program participant will not be made public, except as provided under a preexisting privacy policy of the subrecipient and consistent with State and local laws regarding privacy and obligation of confidentiality.

PREVENTION AND RAPID RE-HOUSING STANDARDS

ELIGIBILITY

Prevention: To be eligible for homelessness prevention services through the ESG individuals and families must have an annual income below 30% of the median income for the area and meet the federal criteria under the at risk of homelessness definition in 24 CFR 576.2 or meet the criteria in category 2 or 4 of the homeless definition in 24 CFR 576.2.

Rapid Re-housing: To be eligible for rapid re-housing assistance through the ESG individuals and families must:

- Meet the federal criteria under category (1) of the homeless definition in 24 CFR 576.2.
- Meet with federal criteria under category (4) of the homeless definition in 24 CFR 576.2 and live in an emergency shelter or other place described in category (1) of the homeless definition.

- Have an income that is less than or equal to 30% of the Area Median Income.
- Must lack sufficient resources or support networks to retain housing without assistance.

PRIORITY POPULATIONS

- Families with children;
- Domestic violence survivors
- Single persons without long term disabilities; and
- Veterans, especially those that are not eligible for services from the Department of Veteran Affairs (VA).

SERVICE TYPE, AMOUNT & DURATION

Minimum standards for determining the type, amount and duration of housing stabilization and/or relocation services provided to a program participant, including maximum amount of assistance, maximum number of months the program participant may receive assistance, or the maximum number of times the program participant may receive assistance, are:

a) Financial Assistance:

- Use with other subsidies: Payment for Financial Assistance costs shall not be provided to a participant who is receiving the same type of financial assistance through other public sources.
- Rental application fees: Payments shall only be made for fees charged by the owner to all applicants.
- Security deposits: Payments shall not exceed two (2) month's rent.
- Last month's rent: Payment shall not exceed one (1) month's rent and shall be included in calculating the participant's total assistance.
- Utility deposits: Payments shall only be made for gas, electric, water and sewage deposits.
- Utility payments:
 - Payments shall not exceed 24 months per participant, including no more than 6 months of utility payments in arrears, per service;
 - A partial payment counts as 1 month;
 - Payment shall only be made if the utility account is in the name of the participant or a member of the same household;
 - Payment shall only be made for gas, electric, water and sewage costs;
 - Participants shall not receive more than 24 months of utility assistance within any 3-year period.

b) Rental Assistance

- Payment shall not exceed 24 months total during a 3-year period in tenant-based or project-based housing.
- Payment for short-term rental assistance shall not exceed 3 months.
- Payment for medium-term rental assistance shall be for more than 3 months, but shall not exceed 24 months.

- Payment for rent arrears shall not exceed 6 months and shall be a one-time payment, including any late fees. The number of months paid in rental arrears must be considered as part of the 24 months of allowable service.
- Except for one-time payment of rental arrears on the participant's portion, payment shall not be provided to a participant who is receiving tenant-based rental assistance or living in a unit receiving project-based assistance.
- Payment shall not exceed Fair Market Rent established by HUD and shall comply with HUD's standards of rent reasonableness.
- Calculation of the rental payment amount shall only include monthly rent for the unit, any occupancy fees under the lease (except for pet or late fees) and if the participant pays separately for utilities, the monthly utility allowance established by the Oklahoma City Housing Authority.
- Payment for rent shall only be made when there is a rental assistance agreement between the agency and the owner, which sets forth the terms under which rental assistance will be provided, including the prior requirements; a requirement that the owner provide the provider with a copy of any notice to vacate given to the participant or any complaint used to commence an eviction action; and the same payment due date, grace period, and late payment penalty requirement as the participant's lease.
- Payment of any late payment penalties incurred by the provider shall not be claimed for reimbursement by ESG.
- Payment shall only be made when there is a legally binding, written lease for the rental unit between the participant and the owner, except for payment of rental arrears.
- Payment shall only be made once the participant has been deemed eligible for assistance.
- Payments shall not be made until required re-certifications have been completed and all documentation of continued eligibility is received.

PERMANENT SUPPORTIVE HOUSING STANDARDS

ELIGIBILITY

Minimum standards for determining and prioritizing which eligible families and individuals shall receive permanent supportive housing are:

- To be eligible for permanent supportive housing people must: meet the federal criteria under category (1) or (4) of the homeless definition in 24 CFR 576.2. Eligible households include individuals with disabilities and families in which one adult or child has a disability.

DOCUMENTS REQUIRED AT INTAKE

Documentation should not denote a barrier to housing. Permanent Supportive Housing providers will request the documents listed below; but if any are not available, the housing provider will work to obtain all documents within 45 days of program intake.

1. Identification - Copy of (1) form of identification.

2. Homeless Status – Providers should make every effort to meet the federal standards of documentation. Providers should make every effort to receive 3rd party documentation. If 3rd party documentation is not available 2nd party documentation or observation by a homeless services provider is acceptable. At a minimum, client self-certification will be accepted with documentation of 3rd and 2nd party attempts. Records contained in HMIS or comparable database used by a victim service or legal service provider are acceptable evidence of 3rd party documentation.
3. Disability – Documentation of disability can include verification of disability benefits or a written signed statement from a qualified source. Written documentation should: (a) identify the physical mental or emotional impairment, why it is expected to be of long-continued or indefinite duration, how it impedes the individual’s ability to live independently, and how the individual’s ability to live independently could be improved by more suitable housing conditions; or (b) identifies a developmental disability; or (c) identifies AIDS or related conditions. Lack of disability documentation must not prevent an individual or family from being admitted to a permanent supportive housing program. Programs may enroll the person or family without such documentation, but documentation must be obtained within 45 days of date of intake. A copy of a disability check is adequate documentation. Permanent Supportive Housing providers can serve households in which either an adult, or a child, has a disability.
4. Chronically Homeless Status – Providers must gather evidence of length of homelessness or number of times an individual or family has been homeless. HMIS provides an official 3rd party record of homelessness that can be used for this purpose.
5. Income verification – Even though the program may not have an income requirement at entry documentation of the client’s income must be obtained from all sources if a client is responsible for paying a portion of the rent.

PRIOTIZATION FOR PSH BEDS DEDICATED OR PRIORTIZED FOR CHRONIC HOMELESSNESS

The following order shall be followed in CoC funded permanent supportive housing beds dedicated to persons experiencing chronic homelessness, and permanent supportive housing beds prioritized for persons experiencing chronic homelessness:

1. Homeless individuals and families with the longest history of homelessness and with the most severe service needs.
2. Chronically homeless families and individuals with the longest history of homelessness.
3. Chronically homeless families and individuals with the most severe service needs.

PRIOTIZATION FOR PSH BEDS NOT DEDICATED OR PRIORTIZED FOR CHRONIC HOMELESSNESS

The following order shall be followed in CoC funded permanent supportive housing beds NOT dedicated to persons experiencing chronic homelessness, and permanent supportive housing beds NOT prioritized for persons experiencing chronic homelessness:

1. Homeless individuals and families with a disability and the most severe needs.
2. Homeless individuals and families with a disability with a long period of continuous or episodic homelessness.
3. Homeless individuals and families with a disability coming from transitional housing.

*As all CoC & ESG funded organizations are required to take clients through the Coordinated Entry System (CES), prioritization should already be addressed before a referral is even made. Providers should only have to obtain the required documentation to verify the client's status.

PARTICIPANT CONTRIBUTION

Individuals and families residing in permanent supportive housing are required to pay rent. Rent charges may not exceed those specified in 578.77. No fee other than rent or occupancy charges may be charged to program participants. This includes meal, copayments for services, transportation and all other services that may be provided to program participants.

TRANSITIONAL HOUSING STANDARDS

ELIGIBILITY

Minimum standards for determining and prioritizing which eligible families and individuals shall receive transitional housing are:

- To be eligible for transitional housing people must: meet the federal criteria under category (1) or (4) of the homeless definition in 24 CFR 576.2.

DOCUMENTS REQUIRED AT INTAKE

Documentation should not denote a barrier to housing. Transitional Housing providers will request the documents listed below; but if any are not available, the housing provider will work to obtain all documents within 45 days of program intake.

1. Identification - Copy of (1) form of identification.
2. Homeless Status – Providers should make every effort to meet the federal standards of documentation. Providers should make every effort to receive 3rd party documentation. If 3rd party documentation is not available 2nd party documentation or observation by a homeless services provider is acceptable. At a minimum, client self-certification will be accepted with

documentation of 3rd and 2nd party attempts. Records contained in HMIS or comparable database used by a victim service or legal service provider are acceptable evidence of 3rd party documentation.

3. Income verification – Even though the program may not have an income requirement at entry documentation of the client’s income must be obtained from all sources.

PRIORITY POPULATIONS

In providing transitional housing providers shall prioritize the following populations:

- Family with head of household between ages of 18-24 years of age
- Households with behavioral health needs
- Households experiencing domestic violence

MINIMUM STANDARDS

All referrals to transitional housing must be made through the coordinated entry system. The following minimum standards will be applied to all transitional housing programs:

- Maximum length of stay cannot exceed 24 months.
- Assistance in transitioning to permanent housing must be made available/provided.
- Supportive services must be provided throughout the duration of stay in transitional housing.
- Program participants in transitional housing must enter into a lease, sublease, or occupancy agreement for a term of at least one month. The lease, sublease, or occupancy agreement must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum of 24 months.




Homeless Definition

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



Homeless Definition

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

Commonly Referred to Links

1. Oklahoma City CoC Coordinated Intake & By Name List Procedures
<http://coalitiontoendpoverty.org/wp-content/uploads/2017/10/Oklahoma-City-CoC-Policies-and-Procudures.pdf>
2. Oklahoma Landlord and Tenant Acts
<https://www.ok.gov/OREC/documents/Landlord%20and%20Tenant%20Act%20Update.pdf>
3. Guidance Posted on ESG Minimum Habitability Standards and Permanent Housing
<https://www.hudexchange.info/news/new-guidance-posted-on-esg-minimum-habitability-standards-for-emergency-shelter-and-permanent-housing/>
4. HUD Income Limits
<https://www.huduser.gov/portal/datasets/il.html>
5. HUD FMR
<https://www.huduser.gov/portal/datasets/fmr.html>
6. 24 CFR 578.77 Calculating occupancy charges and rent
<https://www.law.cornell.edu/cfr/text/24/578.77>

APPENDIX 9

AP-75 NARRATIVE RESPONSES (CONTINUATION)

Appendix 9.A.

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

Introduction

An Analysis of Impediments (AI) was completed for the City in March 2020. The AI includes a review of both public and private sector housing data in Oklahoma City to identify practices or conditions that limit fair housing choice. Analysis of demographic, economic, and housing data used in the report establishes the context in which housing choices are made. Primary findings include rising rents and tightening of the rental market has disproportionately hurt very low income single-person households and families, many of whom are racial and ethnic minorities, persons with disabilities, and elderly residents. Other concerns noted in the report are as follows:

- Rising home prices has introduced predatory lending and home purchase activity.
- Weak state laws to protect tenants from evictions without just cause exacerbates their vulnerability and increases homelessness, an undesirable outcome which is costly for the public sector.
- Residents and landlords would benefit from increased education and training, including fair housing laws and requirements and “good tenant” classes.
- Growing concern about the effect of city-facilitated redevelopment efforts on displacement of low income and minority residents.
- Multifamily developments are not being built to comply with the accessibility requirements under the Fair Housing Act due to lack of inspection/testing and enforcement.

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

The City's response to the noted impediments are addressed in Section SP-55 of the FY 2020-24 Five-year Consolidated Plan and in AP-75 of each Annual Action Plan.

Policies and ordinances adopted by the City are intended to protect the health, safety and public welfare of citizens and property. The City’s policies and ordinances are not meant to create barriers to the development of affordable housing. Some policies and ordinances may result in an unintended consequence (i.e., increasing the cost to develop, maintain and improve affordable housing). The City attempts to limit or eliminate adverse impacts through review of proposed development code amendments prior to enactment, and by reviewing existing codes. The most recent Analysis of Impediments document identified some potential barriers in current zoning rules. These include site standards, limits on density, definition of family and occupancy restrictions, and housing type limitations.

Strategies to Remove or Ameliorate Barriers:

The City is in a process of comprehensive review and rewrite of the development code which will extend over the next several years. Currently an effort to allow accessory dwelling units is underway. The City is also writing new base zones for the core of the City that will allow more housing types to be developed with smaller lot sizes, including accessory dwellings within single-dwelling neighborhoods. The re-write is intended to provide more flexibility for housing developers in relation to setbacks, building height, and parking regulations that can ultimately decrease affordability on housing projects. New zoning will require public input and approval processes and will continue over the next few years. The City is also exploring ways to delay demolitions of older homes that are more affordable and will continue to search for alternative solutions.

The City also updated the Housing Affordability and Housing Market studies in 2021. These studies provided numerous suggestions for increasing affordable housing in the City and helped quantify the current housing shortfalls. The City is currently working with a consultant in a comprehensive effort to complete an Affordable Housing Implementation Plan for The City, which is expected to be completed and offered to City Council in late 2024.

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

- Adoption of the International Existing Building Code; This Code applies to multi-family housing and reduces financial barriers to renovating existing building by allowing greater flexibility in materials used in the renovation
- The City has exempted impact fees for water and sewer in the core area of the city to reduce the cost of infill housing and other redevelopment efforts;
- The City has exempted the fees for permits to nonprofit builders of affordable housing;
- The City does not require engineering or architectural seals for nonprofit affordable housing developers; The rules and requirements for architectural seals are statutorily mandated by the Oklahoma State Architectural and Registered Interior Designers Act (59 Oklahoma Statutes, 2007, Section 46.1 et seq.). Specifically, Section 46.21b.C.5.e, f exempts from the provisions of the Act referenced above, residential structures no more than two (2) stories in height, including apartments containing no more than thirty-two (32) dwelling units or guest units per building. The City's building permit checklist includes an item for "Applicable Seals and Certifications" if required, prior to the issuance of a permit. Most assembly use buildings and larger buildings that involve spans of structural members in excess of 30 feet may be required to be designed by an

Architect of Engineer licensed in the State of Oklahoma.

- Building permit fees are waived by policy for nonprofit charitable organizations engaged in the construction or remodeling of one or two family dwellings for the purpose of providing housing assistance to low-income persons or households;
- There are no licensing requirements for builders or professionals except in the case of high-rise structures. The State of Oklahoma does not require a license for general contractors; however, electrical, plumbing, mechanical, sign, driveway and fire suppression system permits can only be issued to contractors licensed in the State of Oklahoma and registered with the City of Oklahoma City. These contractors must be licensed by both the State of Oklahoma and The City of Oklahoma City. Instructions for licensing are available on the City's website.

Actions the City 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.) Infill lots that are already zoned as residential. Property rezoning requires a fee to the developer and is rarely proposed for small-scale affordable housing development. In 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 the City will need to be strategic in order to remedy these unintended consequences. Staff will continue to monitor changes in policy or codes that adversely affect affordable housing and will provide input as necessary on public policy proposals to eliminate or reduce adverse impacts on affordable housing programs.

Discussion

The City of Oklahoma City remains committed to ensuring equal housing opportunity for all persons. Proposed Action Plan activities for the 2024-2025 Fifth Action Year Plan provide direct funding to the Metropolitan Fair Housing Council for the provision of fair housing training, compliance, and complaint processing functions. Staff will continue to participate in Fair Housing Seminars as part of Fair Housing Month activities and will continue to monitor affordable housing barriers and provide resources where needed to ensure compliance.

The City contracts with Metropolitan Fair Housing Council (MFHC) using CDBG funds to provide fair housing services to the community. In the last year Metro processed 385 potential Fair Housing complaints. The majority were filed based on discrimination due to disability. The second largest complaint category was familial status. Of all complaints, eighteen (18) were filed with HUD's Office of Fair Housing & Equal Opportunity for Oklahoma City. In addition, MFHC collected \$4,575 in FY 2022-23

for Oklahoma City residents who contacted MFHC with complaints of unfair treatment by housing providers. These processes raise the awareness of Fair Housing Law.

In addition, MFHC conducted Fair Housing/Fair Lending/Renters Rights Seminars this year through 23 Fair Housing seminars and published two (2) Fair Housing Forum newsletters, fair housing training materials, and ads published in minority newsletters serving Oklahoma City. City staff participated in some of these outreach events. These activities speak directly to improving the understanding of and enhance attention to compliance with fair housing law. These important activities will continue in the upcoming year.

Other identified impediments are being addressed by the City outside this Action Plan. One of these is zoning, and as a related issue, NIMBYism which is often used to block multi-family development. Consultants and staff re-writing the development and zoning codes are working to increase compatibility and transition standards between housing types. Form-based metrics are designed to ameliorate concerns about differences in housing types among neighbors by placing more intense development zones nearer to high opportunity areas, and tapering development intensity to the single-dwelling neighborhoods. The code re-write effort is also considering changes to single-dwelling neighborhoods to allow up to two (2) dwellings on all core lots, and up to four (4) dwellings on corner lots with more street access. Form-based regulations would ensure that new allowable housing types conform to neighborhoods, and reduce NIMBYism for gentle density increases within the core of the city where transit, shopping and other opportunity services already exist. The hope is that a tapered approach will allow more housing product types to be constructed in areas where only single-dwelling types are currently allowed.

The City approved a Bond issue in the Fall of 2017 that included adding more sidewalks, transit stops, increased ADA compliance at existing stops, and performance of bus system upgrades to advance the public transit system- with a focus on improvements where it is most needed by the citizenry based on review of area incomes and employment centers. The Bond also included a \$10M set aside for affordable housing- the first time the City has made such a proposal or investments. All but \$2M has been allocated to projects, and another is under review for the remainder of these funds. The adopted policy for use of the affordable housing Bond funds provides a focus on supporting mixed-income developments in areas accessible to employment, transit, quality schools and grocery stores for persons making less than 80% AMI.

In September of 2021, City Council adopted a plan for use of federal Coronavirus State and Local Fiscal Recovery Funds (Fiscal Recovery Funds) provided pursuant to the American Rescue Plan Act of 2021 (ARPA). The plan included a subcategory allocation of \$8.2M for affordable housing projects. A Request for Proposals was released in the fall of 2022, and funding agreements were subsequently issued for nine projects supporting development of over 500 affordable units. Those projects are currently in various stages of construction.

APPENDIX 10

FINAL FUNDING ALLOCATION TABLES

COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM
PROPOSED 2024-2025 BUDGET

SOURCES OF FUNDS

2024-25 CDBG Allocation	\$ 5,055,205.00
	\$ -

Program Caps
Public Services @ 15% \$758,280.75
Planning & Admin @ 20% \$1,011,041.00

as proposed:
12.43%

as proposed:
20.00%

Funds Available to Allocate	\$ 5,055,205.00
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PROJECT FUNDING ALLOCATIONS	2023-2024	Proposed 2024-25	FY-2023-24	FY 2023-24	2024-2025
	Allocation (1)	New Allocation	Under Contract- Obligated Funds (2)	Proposed Distribution of Reallocated and Recaptured Funds (2)	Total Funding (1)
AFFORDABLE HOUSING DEVELOPMENT					
JPNA/Paseo Joint Venture-Walnut Dev.Infrastructure	\$ 150,000.00	\$ 100,000.00	\$ 168,275.76	\$ -	\$ 268,275.76
AFFORDABLE HOUSING REHAB/RETENTION					
OKC Housing Assistance Program-Ext. Maintenance	\$ 1,000,000.00	\$ 580,000.00	\$ 520,000.00	\$ 100,000.00	\$ 1,200,000.00
HEMP Program Delivery	\$ 675,000.00	\$ 675,000.00	\$ -	\$ -	\$ 675,000.00
Oklahoma City Housing Authority	\$ 235,000.00	\$ -	\$ -	\$ 235,000.00	\$ 235,000.00
Pest Inspection and Treatment Program	\$ 24,000.00	\$ -	\$ -	\$ 24,000.00	\$ 24,000.00
CAA Emergency Home Repair	\$ 860,000.00	\$ 600,000.00	\$ -	\$ -	\$ 600,000.00
SLUM AND BLIGHT REMEDIATION					
Urban Renewal Authority Completions	\$ 788,880.00	\$ 788,880.00	\$ -	\$ -	\$ 788,880.00
OKC Abandoned Housing- spot blight	\$ 250,000.00	\$ -	\$ 150,000.00	\$ 100,000.00	\$ 250,000.00
PUBLIC SERVICE ACTIVITIES					
SNI-PS#	\$ -	\$ 420,000.00	\$ -	\$ -	\$ 420,000.00
COTPA (Embark) Share a Fare	\$ 105,000.00	\$ 105,000.00	\$ -	\$ -	\$ 105,000.00
Community Health Centers Healing Hands (PS)	\$ 65,000.00	\$ 65,000.00	\$ -	\$ -	\$ 65,000.00
CASA	\$ 36,000.00	\$ 38,500.00	\$ -	\$ 1,500.00	\$ 40,000.00
Public Service Allocations subject to 15% Cap (includes redistribution)		\$628,500.00			
PUBLIC FACILITIES ACTIVITIES					
SNI-PF# (includes \$136,000 Program Delivery)	\$ 989,500.00	\$ 413,762.00	\$ 338,284.34	\$ 447,953.66	\$ 1,200,000.00
Uncommitted PF Funds-Available for solicitation (General PF)	\$ 206,834.49	\$ 18,022.40	\$ -	\$ 365,002.58	\$ 383,024.98
Garden Oaks Community Center	\$ -	\$ -	\$ -	\$ 200,000.00	\$ 200,000.00
ECONOMIC DEVELOPMENT					
Section 108 Loan Repayment (Default Contingency)	\$ 50,000.00	\$ -	\$ -	\$ 100,000.00	\$ 100,000.00
CAA Small Business Services	\$ 40,000.00	\$ 40,000.00	\$ -	\$ -	\$ 40,000.00
New View Business Assistance	\$ -	\$ 200,000.00	\$ -	\$ 100,000.00	\$ 300,000.00
ADMINISTRATION					
Metro Fair Housing Council	\$ 93,000.00	\$ 93,000.00	\$ -	\$ -	\$ 93,000.00
Planning	\$ 45,222.40	\$ 45,000.00	\$ -	\$ -	\$ 45,000.00
Administration	\$ 872,819.00	\$ 873,040.60	\$ -	\$ -	\$ 873,040.60
<i>unallocated/Unprogrammed Funds</i>	\$ 58,275.76				
Total Funding Allocations	\$ 6,544,531.65	\$5,055,205.00	\$1,176,560.10	\$1,673,456.24	\$ 7,905,221.34
Remaining funds Available to Allocate		\$ -			

(1) FY 2023-24 Allocations and the FY 2024-25 Total funding columns include prior year funds currently obligated/under contract and proposed redistribution of unallocated funds.

(2) FY 2023-24 expenditures will continue through June 30, 2024. Unexpended obligated funds, and proposed reallocated/recaptured distribution are based on staff projections as of 4/2/24. These are estimates only.

**HOME INVESTMENT PARTNERSHIP
PROGRAM
PROPOSED 2024-2025 BUDGET**

SOURCES OF FUNDS

2024 HOME Allocation	\$	2,236,659.00
Unallocated 2023-2024 Program Funds & PI	\$	-
Estimated 2023-24 Program Income	\$	-
Recaptured Program Funds		

Available to Allocate	\$ 2,236,659.00
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PROJECT FUNDING ALLOCATIONS

PROGRAM	2023-2024 ALLOCATION**	ESTIMATED CARRY FORWARD/REALLOCATION	PROPOSED 2024-25 ALLOCATION	2024-25 TOTAL EST. FUNDING**
DOWN PAYMENT ASSISTANCE				
Targeted Area DPA (80% spending goal)/General DPA (20% Spending Goal)	\$ 484,713.27	\$ 217,474.93	\$ 800,000.00	\$ 1,017,474.93
Oklahoma City Housing Assistance Program* (whole house rehabilitation-40% SNI spending goal.)*	\$ 1,000,000.00	\$ 750,000.00	\$ -	\$ 750,000.00
Uncommitted-Available for Solicitation ***				
Progress OKC SF Homes	\$ 550,000.00	\$ 4,729.01	\$ 250,000.00	\$ 254,729.01
Hilcrest Green II Apartments	\$ -	\$ 660,000.00	\$ -	\$ 660,000.00
OCHA Vita Nova	\$ -	\$ 1,200,000.00	\$ -	\$ 1,200,000.00
OCHA Creston Park Phase I	\$ 800,000.00	\$ 800,000.00	\$ -	\$ 800,000.00
COMMUNITY HOUSING DEVELOPMENT ORGANIZATION				
Paseo Hsg.	\$ 698,785.41	\$ 742,372.70	\$ -	\$ 742,372.70
Jefferson Park	\$ 1,039,631.00	\$ 755,550.04	\$ -	\$ 755,550.04
Neighborhood Housing Services	\$ -	\$ 340,000.00	\$ -	\$ 340,000.00
Unallocated CHDO	\$ 835,184.75	\$ 459,315.82	\$ -	\$ 459,315.82
2023 CHDO SET-ASIDE (15% Statutory Minimum)	\$ 397,451.55	\$ -	\$ 335,498.85	\$ 335,498.85
ADMINISTRATION	\$ 426,662.46	\$34,686	\$ 223,665.90	\$ 258,351.91
Total Funding Allocations	\$ 9,549,387.77	\$ 7,721,924.08	\$ 2,236,659.00	\$ 9,958,583.08

*Funding for the Housing Rehabilitation Program will be prioritized within SNI neighborhoods, with a goal of at least four (4) homeowners receiving assistance.

**FY 2023-24 Allocations and FY 2024-25 Funding Recommendations include prior year funds that are either obligated but not yet expended, and/or unobligated funds not previously allocated.

*** Includes a \$300,000 setaside for home construction in SNI Neighborhoods.

\$ -

2024-25 ESG Allocation:	\$ 431,333.00
2024-25 HOPWA Allocation:	\$ 1,399,461.00