

**The City of Oklahoma City**  
**2016-2017 Second Action Year**

**Strategic Plan for Year 2016-2017**

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

Strategic Plan Submission Date: May 14, 2016





## Executive Summary

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

#### 1. Introduction

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

October 1st of each year. Regulations governing the CDBG program require that each activity undertaken must meet one of the following three (3) National Objectives:

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

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

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

## **2. Summarize the objectives and outcomes identified in the Plan**

Second program year allocations are based on the most recent projections available at the time of reporting. For the Second Action Plan Year The City of Oklahoma City recognized a minimal increase in CDBG and HOPWA funding and a 5% increase in HOME funding. ESG funding was relatively unchanged.

In 2015, the City was successful in an application for Section 108 funding to support a new 21C Museum Hotel in the historic Film Row District. Section 108 Loan Guarantee capacity will be utilized during the First and Second Action Year Plans to support the development which includes a 135 room boutique hotel, restaurant and museum. The 21C site is located within the Oklahoma City Round III Empowerment Zone as designated by HUD (Census tract 1030.000). If additional opportunities materialize in the FY 2016-17 Action Plan year, Section 108 Loan Guarantee applications may be submitted to further the City's ongoing economic development initiatives. The City continues

to concentrate resources strategically within the SNI neighborhoods to promote a holistic approach to neighborhood revitalization, rather than funding isolated stand-alone activities throughout the metropolitan area with nominal impact. In the 2016-17 Second Action Plan Year, the City of Oklahoma City has continued to place emphasis on affordable housing, with specific emphasis on the Neighborhood Revitalization Strategy Area (NRSA).

HOME funding has been allocated for down payment assistance to low income homebuyers, whole house rehabilitation, non-profit housing construction, and owner-occupied rehabs within the SNI neighborhoods. CDBG funds have been used to support public service activities which continue to be a priority of the community. Funding has been allocated for free and reduced bus and taxi fares for special populations, graffiti removal, securing abandoned houses, after school programming, hazardous tree removal, legal assistance, and public education. CDBG funding for public facilities has been allocated to support rehabilitation of a response and evaluation center for abused children, two (2) community parks, and sidewalks and tree planting efforts within the SNI neighborhoods. Additional funding for public facilities and infrastructure remains in contingency while new applications are being vetted and reviewed by Staff.

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

### **3. Evaluation of past performance**

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

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

The Consolidated Plan and First Action Year Plan addressed **housing goals** by providing funding and engaging in program activities that include support for nonprofit and for-profit housing developers to rehabilitate and construct new affordable housing; support for Community Housing Development Organizations to rehabilitate and construct new affordable housing; support for the Oklahoma City Housing Authority to modernize public housing units; funding to assist with emergency repairs of housing; support for down payment and closing cost assistance to expand homeownership opportunities; funding for activities that support the City's housing rehab program, and housing and services for persons with HIV/AIDS. Activities undertaken in the 2015-16 First Action Plan Year have addressed these goals and are on target to meet projected outcomes by fiscal year end on June 30, 2016.

The goal of providing a **suitable living environment** was addressed in the Consolidated Plan and First Action Year Plan by continuing ongoing programs that address specific community needs. The 2015-16 First Action Plan Year strategy called for continued support for homeless services through the Emergency Solutions Grant Program; the Continuum of Care Program; discounted taxi coupons for elderly, disabled and sight impaired persons under the City's Share-A-Fare program; bus passes and discounted taxi service for homeless individuals and families; local funding of capacity building activities for neighborhood organizations; CDBG funding to provide neighborhood improvements; activities to address vacant and abandoned housing; removal of graffiti; and, removal of slum and blight conditions in low-income areas.

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

#### **4. Summary of Citizen Participation Process and consultation process**

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

1. To provide citizens with reasonable and timely access to local meetings, information, and records relating to the City's proposed use of Federal grant program funds administered by the City, as required by the Secretary of HUD, and relating to the actual use of funds under the Housing and Community Development Act (HCDA), etc., as amended;
2. To provide technical assistance to groups representing persons of low/moderate income in developing proposals for applicable funding opportunities;

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

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

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

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

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

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

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

## **5. Summary of public comments**

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

Neighborhoods Initiative (SNI) program, and the need for additional resources to assist domestic violence victims and homeless youth.

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

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

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

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

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

All public feedback was given due consideration, although not every requested activity could be funded. Some comments were in direct opposition with one another, requiring either substantial compromise between two worthy alternatives, or rejection of a viewpoint not in conformance with the larger majority. Other suggestions were non-compliant with program regulations and strategic goals. For

example, multiple comments were received about the need for investment in neighborhoods other than NRSA and SNI target areas; however, the City has committed 80% of available resources to those neighborhoods with support from the City Council to ensure a holistic and sustainable approach to revitalization. The need for greater community investment is apparent; however, resources (both monetarily and administratively) are insufficient to enlarge the targeted neighborhood boundaries at the present time.

## **7. Summary**

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

Citizen involvement and input from local non-profits and service providers has been instrumental in identifying priority needs, strategic objectives, and funded activities for the Second Year Action Plan. During the 2015-16 First Action Plan Year, the falling prices of commodities, specifically the price of crude, has adversely affected local growth due to the City's disproportionate reliance on the energy industry. Rapidly declining oil prices have led to substantial corporate layoffs among some of the City's largest employers, and a significant decrease in sales tax revenues which has impacted the area at both the state and local levels. As The City is heavily dependent on sales tax revenues, it is currently under a hiring freeze as a result of budget shortfalls. Although development continues throughout the City, albeit at a slower pace, multiple large-scale project proposals have been either terminated, scaled back, or postponed indefinitely. Single family foreclosures are trending upward.

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



monitored in the coming year, and funding priorities will be revised as needed to address changes in the market.

A substantial amendment may be required from time to time as the City adapts to changing needs and priorities within an Action Plan year. A substantial amendment to the Consolidated Plan is defined as an amendment that adds a new sub-grantee, transfers funds from one activity to another involving 30% or more of the funds, or cancels an activity.

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

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

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

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

**Table 1 – Responsible Agencies**

**Narrative (optional)**

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

**Consolidated Plan Public Contact Information**

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

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

### **1. Introduction**

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

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

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

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

The City actively interacts on an on-going basis with our Continuum of Care (CoC) subrecipients, including a number of mental and private service agencies that provide various types of assisted housing. Several homeless service providers within the CoC specialize in assisting individuals with mental health concerns. Case managers with these organizations receive SSI/SSDI Outreach, Access, and Recovery (SOAR) training and connect eligible clients to appropriate SSI/SSDI benefits. All the community mental health centers in the City collaborate with CoC housing providers and two of the mental health centers are also housing providers.

Besides the Continuum of Care Committee, Community Development Division staff participates in the Coalition to End Poverty, and the Governor’s Interagency Council on Homelessness which serves as a forum for communication with representatives from state agencies, community organizations, and non-profits.

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

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

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

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

Planning for the homeless strategies and outcomes starts with the Oklahoma City Coalition to End Poverty. This is a broad based group of service/housing providers, faith based organizations; volunteer advocates and service recipients. This group provides insight and feedback on the Plan objectives to meet the needs of people who are homeless and have special needs including people with HIV/AIDS. The Coalition updates the City's 10-Year Plan to End Homelessness and works to provide awareness to elected officials, interested parties and the public about homelessness and people who have special needs.

In collaboration with the City of Oklahoma City Planning staff and the Homeless Alliance, the Coalition organizes and executes the annual Point in Time Count (PIT) of the Homeless each January. This information is used in the annual HUD Continuum of Care (CoC) competition. The information obtained from the annual count is used to calculate need and track trends that occur in the homeless population including people who are chronically homeless and families with children.

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

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

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

Homeless Management Information System (HMIS) policies and procedures are developed through the Data Committee of the Coalition to End Poverty. Membership of the data committee is comprised of representatives from the CoC lead agency, the HMIS lead agency, and several CoC and ESG 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, as well as several other funding sources. Recently, the CoC switched from a self developed HMIS system to Servicepoint which allowed a cost savings of \$77,000 which is being utilized to create a new permanent supportive housing project for chronically homeless individuals.

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

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

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

**Table 2 – Agencies, groups, organizations who participated**

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

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



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

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

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

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

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

The City of Oklahoma City maintains an ongoing dialogue with local non-profit and for-profit housing providers and developers to gauge housing needs within the metropolitan area. Solicitations for development proposals are drafted based upon current housing needs and community goals such as mixed income housing, deconcentration of poverty, infill development, and minimal design standards. Housing needs for very low

income families are identified through continuing conversations and discourse with the Oklahoma City Housing Authority. In this Second Action Year Plan, The City of Oklahoma City has also reviewed the recent release of the Oklahoma County Housing Needs Assessment prepared by Integra Realty Resources for the Oklahoma Housing Finance Agency in January 2016. This report provides helpful data, trends, and statistics for the local housing market such as demographics, market supply and demand, vacancies, average rental rates, housing costs, economic conditions and needs of the homeless.

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

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

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

## **AP-12 Participation – 91.105, 91.200(c)**

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

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

The citizen participation process and summary of feedback has been fully described in of the Executive Summary. Feedback received at the public meetings was used in conjunction with quantitative data and current demographics to establish priority needs for this Consolidated Plan Second Action Year Plan. Where possible, funding allocations and strategic goals were identified based upon the most urgent community needs. Staff will evaluate needs on an ongoing basis. Funding allocations in each Annual Action Plan will be adjusted as needed to promote a strategic and targeted allocation of resources, with the intent of creating a noticeable and sustainable community benefit.

**Citizen Participation Outreach Table 4 – 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 Meeting	<p>Non-targeted/broad community</p> <p>Non-Profit Organizations and Service Providers</p>	<p>Two (2) public meetings were held for public comment and feedback. The first on January 7, 2016 was scheduled at 2:00 p.m. to accommodate citizens working evening hours, and to provide an alternative time for representatives from local non-profits and service providers during normal business hours. The January 7th meeting was well attended with thirty-six (36) community members present. The evening meeting on January 12th was attended by twenty (20) community members. Eight (8) City Community Development Staff members were present at each meeting.</p>	<p>A summary of community feedback is attached in the appendices of this report.</p>	<p>All comments and suggestions were given due consideration in the allocation process, although not all requests could be supported.</p>	

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

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

## Expected Resources

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

#### Introduction

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

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

HUD released an interim rule for a National Housing Trust Fund (HTF) on January 30, 2015. These funds are presently administered by the State under a structure similar to Low Income Housing Tax Credits (LIHTC). Due to similarities with the HOME program, political discussion at the time of reporting suggests that this program may soon replace the HOME program due to the similarities in structure and intent. It is unknown at the present time if the City of Oklahoma City will pursue HTF funding through the State; however, if an opportunity arises to increase affordable housing production through this resource, application will be made.

The City of Oklahoma City was approved for Section 108 funding during the First Action Year Plan to fund a new 21C Museum Hotel in the historic Film Row District, and anticipates the use of its Section 108 Loan Guarantee capacity during this Second Action Year Plan to support the development of a 135 room boutique hotel, restaurant and museum. The 21C site is located within the Oklahoma City Round III Empowerment Zone as designated by HUD (Census tract 1030.000). If additional opportunities materialize in the FY 2016-17 Second Action Plan year, Section 108 Loan Guarantee applications may be submitted to further the City's ongoing economic development initiatives.

**Priority Table-Table 5 Expected Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	4,365,726	171,027	151,693	4,688,446	12,918,758	Prior year resources include 2015 unprogrammed funds, and recaptured program funds. Future allocations assume flat funding over the five (5) year life of the Plan. In addition to the \$4,688,446 allocated in the Second Action Year Plan, there is a carry forward of \$4,512,409.47 for total 2016-17 CDBG funding in the amount of \$9,200,855.18.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,785,041	122,000	52,111	1,959,152	4,233,633	Prior year resources include unallocated 2015-16 program funds, and recaptured program funds. Future allocations assume a minimum 10% cut in funding over the five (5) year plan period. In addition to the \$1,959,152 HOME funds allocated in the Second Action Year Plan, there remains a carry forward balance of \$4,455,549.45 for total funding of \$6,414,701.26.



Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	544,334	0	0	544,334	1,579,474	Future allocations assume flat funding from year to year.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Reminder 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	388,987	0	0	388,987	1,169,577	Future allocations assume flat funding from year to year.

Table 5 - Expected Resources – Priority Table

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

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

The City has a CHDO set-aside that includes the 15% CHDO statutory minimum and a pool of HOME funds loaned to Community Housing

Development Organizations for new home construction and rehabilitation/sale activities. CHDOs are encouraged to utilize private bank financing along with the CHDO loan pool of HOME funds in providing affordable housing. Proposals for new projects are accepted when the CHDO has completed all previously funded projects. The City facilitates the transfer at no cost, of Oklahoma County owned vacant lots to nonprofit organizations for the construction of affordable housing. The lots are provided to the City through an agreement with Oklahoma County, and the primary lot recipients are CHDO's. The new home construction is typically funded with private financing and other resources. When resources allow, the City also provides local funding (general funds) to agencies that provide services to the homeless.

Federal funds provided by HUD are utilized in several ways to leverage public and private resources. The City's down payment and closing cost assistance program assists in the achievement of home ownership, and has proven to be an attractive program that stimulates significant interest among private lenders. During the 2014-2015 reporting period, the City leveraged its Down Payment Assistance program funds with private financial institution mortgage investments totaling \$4,235,270. Similar leverage can be anticipated annually in future program years. The City may also assist developers by providing HOME funds to document community support for Low Income Housing Tax Credit (LIHTC) applications to the Oklahoma Housing Finance Agency (OHFA) when reasonable to do so. OHFA has in the past provided bonus points for applications that receive a minimum level of funding granted to the project from the local community. LIHTC credits provide significant leverage in affordable housing developments.

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

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

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

year Consolidated Plan period. Construction is anticipated to begin during the Second Action Year Plan.

### **Discussion**

Regarding required match contributions, Presidential Disaster Declarations and HUD match reduction for severe fiscal distress has eliminated the need to provide 25% match funding for the HOME program in recent program years. Although match reductions or waivers cannot be projected in future years, it should be noted that the City has accumulated a significant banked match credit which will ensure that adequate leverage is available for new activities. The City of Oklahoma City continues to prioritize funding of projects that leverage private capital and non-federal funding. It is anticipated that sufficient match will be generated from funded activities to fulfill the match requirement without the use of banked credit.

## Annual Goals and Objectives

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

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Whole-House Rehabilitation-HOME	2016	2017	Affordable Housing	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Quality of Affordable Owner Housing	HOME: \$2,971,987	Homeowner Housing Rehabilitated: 50 Household Housing Unit
2	Exterior Maintenance and Storm Shelters-CDBG	2016	2017	Affordable Housing	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Quality of Affordable Owner Housing	CDBG: \$1,234,000	Homeowner Housing Rehabilitated: 50 Household Housing Unit
3	Emergency Repairs-CDBG	2016	2017	Affordable Housing	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Quality of Affordable Owner Housing	CDBG: \$587,242	Homeowner Housing Rehabilitated: 100 Household Housing Unit
4	Downpayment and Closing Costs Assistance-HOME	2016	2017	Affordable Housing	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Affordability of Owner-Occupied Housing	HOME: \$700,000	Homeowner Housing Added: 60 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	CHDO New Construction/Rehab-HOME	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA	Supply of Affordable Owner-Occupied Housing	HOME: \$1,953,084	Homeowner Housing Added: 8 Household Housing Unit
6	Multi-Family Rehab-CDBG	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA	Quality of Affordable Owner Housing	CDBG: \$982,445	
7	Rehabilitation of Public Housing Units- CDBG	2016	2017	Public Housing		Quality of Public Housing	CDBG: \$234,897	Rental units rehabilitated: 15 Household Housing Unit
8	Affordable Housing-AHDP and RHP- CDBG and HOME	2016	2017	Affordable Housing	NEIGHBORHOOD STRATEGY AREA	Supply of Affordable Housing - AHDP and RHP	HOME: \$334,170	
9	Public Facilities, Srvcs, Infrastructure-SNI CDBG	2016	2017	Non-Housing Community Development	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Quality of Affordable Owner Housing Public Facilities, Services and Infrastructure	CDBG: \$1,569,718	Public service activities other than Low/Moderate Income Housing Benefit: 830 Persons Assisted
10	Neighborhood Capacity- CDBG	2016	2017	Non-Housing Community Development	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Strengthen Neighborhood Capacity	CDBG: \$50,000	Other: 1 Other
11	Special Needs Transportation Services-CDBG	2016	2017	Non-Housing Community Development		Transportation Options -Special Needs Population	CDBG: \$102,842	Public service activities other than Low/Moderate Income Housing Benefit: 2700 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
12	Graffiti Removal-CDBG	2016	2017	Non-Housing Community Development		Public Services-Graffiti Removal	CDBG: \$15,011	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 400 Persons Assisted
13	Secure Vacant and Abandoned Properties- CDBG	2016	2017	Non-Housing Community Development		Address Slum and Blight- Vacant Abandoned Bldgs	CDBG: \$68,562	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 125 Households Assisted
14	Small Business Technical Assistance- CDBG	2016	2017	Non-Housing Community Development		Economic Opportunities for Low and Moderate Income	CDBG: \$39,149	Businesses assisted: 90 Businesses Assisted
15	Small Business Revolving Loan Fund- CDBG	2015	2020	Non-Housing Community Development		Economic Opportunities for Low and Moderate Income	CDBG: \$750,000	Businesses assisted: 4 Businesses Assisted
16	Section 108 Loan Assistance- CDBG	2015	2020	Non-Housing Community Development	NEIGHBORHOOD STRATEGY AREA	Economic Opportunities for Low and Moderate Income	CDBG: \$350,000	Jobs created/retained: 135 Jobs
17	Empowerment Zone Staffing- CDBG	2016	2017	Non-Housing Community Development		Economic Opportunities for Low and Moderate Income		
18	Urban Renewal Title Transfer and Disposition- CDBG	2016	2017	Non-Housing Community Development		Supply of Affordable Rental Housing	CDBG: \$84,529	Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
19	Aid Blighted, Vacant, Underutilized Property-CDBG	2016	2017	Non-Housing Community Development		Acquisition/Clearance of Vacant, Blighted Property	CDBG: \$788,880	Other: 1 Other
20	Sustainability-Social Services Provider Facilities	2015	2018	Non-Housing Community Development		Sustainability Service Provider Facilities-CDBG	CDBG: \$1,455,435	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 3 Projects Assisted
21	STRMU for Persons with HIV/AIDS-HOPWA	2016	2017	Non-Homeless Special Needs		Housing Availability-Persons With HIV/AIDS	HOPWA: \$272,172	Housing for People with HIV/AIDS added: 70 Household Housing Unit
22	TBRA for Persons with HIV/AIDS- HOPWA	2016	2017	Non-Homeless Special Needs		Housing Availability-Persons With HIV/AIDS	HOPWA: \$272,172	Housing for People with HIV/AIDS added: 30 Household Housing Unit
23	Housing for the Chronically Homeless-ESG	2016	2017	Homeless		Supportive Housing for the Chronically Homeless	ESG: \$388,987	Tenant-based rental assistance / Rapid Rehousing: 100 Households Assisted Homeless Person Overnight Shelter: 600 Persons Assisted Homelessness Prevention: 170 Persons Assisted Other: 1550 Other



Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
24	Administration	2016	2017	Administration		Administration	CDBG: \$888,145 HOME: \$455,460	

Table 6 – Goals Summary

### Goal Descriptions

1	<b>Goal Name</b>	Whole-House Rehabilitation-HOME
	<b>Goal Description</b>	Provide HOME financial assistance for the whole-house rehabilitation of a minimum of fifty (50) owner-occupied housing units for income qualified families, fifteen (15) of which will be in the SNI strategy area. HOME funding \$1,727,547.07 allocated to OKC HAP Whole House Rehab Program. An additional \$996,127.26 allocated for whole house rehabs in SNI and \$248,312.93 allocated for acquisition rehabs by Paso Housing. Total allocation for these three (3) activities is \$2,971,987.26.
2	<b>Goal Name</b>	Exterior Maintenance and Storm Shelters-CDBG
	<b>Goal Description</b>	Provide CDBG funding for the remediation of exterior maintenance code violations on a minimum of thirty-five (35) owner-occupied housing units for income qualified families, and installation of storm shelters for a minimum of fifteen (15) homeowners. Funding includes \$1,184,000 for the Exterior Maintenance Program and \$50,000 for storm shelters.
3	<b>Goal Name</b>	Emergency Repairs-CDBG
	<b>Goal Description</b>	Provide CDBG funding for emergency repairs of a minimum of one hundred (100) owner-occupied housing units for income qualified families to address immediate threats to life, health and safety.
4	<b>Goal Name</b>	Downpayment and Closing Costs Assistance-HOME
	<b>Goal Description</b>	Provide HOME funding for down payment and closing costs assistance for a minimum of sixty (60) households.

5	<b>Goal Name</b>	CHDO New Construction/Rehab- HOME
	<b>Goal Description</b>	Provide HOME funding for new construction or rehabilitation of at least eight (8) housing units for income qualified families through Community Housing Development Organizations (CHDO's) and non-profit housing providers.
6	<b>Goal Name</b>	Multi-Family Rehab- CDBG
	<b>Goal Description</b>	CDBG funding will be provided for the rehabilitation of multifamily rental units. The Winds House and Meadowcliff Apartments are in planning and are being vetted by Staff. The number of units to be created cannot be estimated until final plans are in place. It is anticipated that completion of the units will not occur during the 2016-17 Second Action Plan Year; therefore accomplishment data below will reflect zero with future Action Plans noting the projected outcomes.
7	<b>Goal Name</b>	Rehabilitation of Public Housing Units- CDBG
	<b>Goal Description</b>	Provide CDBG funding to the Oklahoma City Housing Authority for the rehabilitation of a minimum of fifteen (15) public housing units.
8	<b>Goal Name</b>	Affordable Housing-AHDP and RHP- CDBG and HOME
	<b>Goal Description</b>	Provide HOME funding to increase the supply of affordable housing by three (3) units in the Mitchford Development using the Affordable Housing Development Program. Project is delayed, so no completions are identified for the Second Action Plan Year. No funding is allocated to the Rental Housing Program in the Second Action Year Plan.
9	<b>Goal Name</b>	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	<b>Goal Description</b>	Provide CDBG Funding to assist in public services and public facilities activities in the SNI neighborhoods, to include tree planting, hazardous tree removal, sidewalks, legal assistance, park improvements, public education, and after school programming.
10	<b>Goal Name</b>	Neighborhood Capacity- CDBG
	<b>Goal Description</b>	\$50,000 provided to support a public infrastrure project in the Midtown neighborhood. New sign kiosks to be installed.

11	<b>Goal Name</b>	Special Needs Transportation Services-CDBG
	<b>Goal Description</b>	Expand transportation options using CDBG funds for homeless individuals and persons with special needs to improve accessibility, and to improve quality of life. An estimated 700000 subsidized taxi fares and bus coupons will be provided to approximately 2,700 homeless persons, seniors, and people with disabilities.
12	<b>Goal Name</b>	Graffiti Removal-CDBG
	<b>Goal Description</b>	Provide CDBG funding to eliminate graffiti at a minimum of four hundred (400) locations in low and moderate income neighborhoods.
13	<b>Goal Name</b>	Secure Vacant and Abandoned Properties- CDBG
	<b>Goal Description</b>	Provide CDBG funding for interim assistance to secure a minimum of 125 vacant and abandoned properties to address slum and blight on a spot basis.
14	<b>Goal Name</b>	Small Business Technical Assistance- CDBG
	<b>Goal Description</b>	Provide CDBG funding to support Technical Assistance (TA) for a minimum of ninety (90) small businesses.
15	<b>Goal Name</b>	Small Business Revolving Loan Fund- CDBG
	<b>Goal Description</b>	Provide CDBG economic development revolving loan fund (RLF) assistance to create jobs and expand commercial services for a minimum of four (4) businesses and microenterprises annually. Loan fund was capitalized in Spring 2015 with prior year CDBG funds. No future allocations are anticipated as fund should become self-supporting.
16	<b>Goal Name</b>	Section 108 Loan Assistance- CDBG
	<b>Goal Description</b>	Apply for Section 108 loan program funds to provide Special Economic Assistance for the creation of jobs. The "funding" allocation noted below is the annual debt service on outstanding loans and not direct assistance to a specific project. It is anticipated that 135 jobs will be created upon completion of the 21C Museum Hotel in summer 2016.

17	<b>Goal Name</b>	Empowerment Zone Staffing- CDBG
	<b>Goal Description</b>	The City will promote and continue to provide staff for the ongoing implementation of the Empowerment Zone (EZ) designation, if the program is extended beyond December 31, 2016. No funding has been allocated to this activity pending confirmation of extension.
18	<b>Goal Name</b>	Urban Renewal Title Transfer and Disposition- CDBG
	<b>Goal Description</b>	Programmatic support for OCURA Affordable housing development.
19	<b>Goal Name</b>	Aid Blighted, Vacant, Underutilized Property-CDBG
	<b>Goal Description</b>	Funding to OCURA as a subrecipient to support slum and blight removal, and LMI housing.
20	<b>Goal Name</b>	Sustainability-Social Services Provider Facilities
	<b>Goal Description</b>	Support for the Community Development Program to assist non-profit service providers with infrastructure and/or rehabilitation of facilities. \$1,455,435 has been carried forward from the First Action Plan Year. \$510,000 has been approved for the Care Center project. \$350,000 is planned for the Metro Better Living Center. \$595,435.13 remains in contingency for projects that are still being reviewed and vetted by Staff.
21	<b>Goal Name</b>	STRMU for Persons with HIV/AIDS- HOPWA
	<b>Goal Description</b>	Provide Short Term Rent Mortgage and Utility (STRMU) assistance using HOPWA funding to an estimated seventy (70) persons with HIV/AIDS.
22	<b>Goal Name</b>	TBRA for Persons with HIV/AIDS- HOPWA
	<b>Goal Description</b>	Provide Short Term Tenant Based Rental Assistance (TBRA) using HOPWA funding to an estimated thirty (30) persons with HIV/AIDS.

<b>23</b>	<b>Goal Name</b>	Housing for the Chronically Homeless- ESG
	<b>Goal Description</b>	ESG funds will be used to provide housing and case management resources for approximately fifty (50) chronically homeless, families and veterans. Legal services will be provided to approximately ninety (90) individuals and families to reduce evictions. Shelter and outreach services will be provided to approximately six-hundred (600) homeless youth and seniors, victims of domestic violence, and individuals with mental illness. Approximately eighty (80) homeless households with children will receive rapid re-housing and prevention services. An estimated 1,500 low income and homeless individuals will access health care services.
<b>24</b>	<b>Goal Name</b>	Administration
	<b>Goal Description</b>	Provide administrative and management support for federal CDBG and HOME programs. CDBG includes Administrative support, Planning support, and Fair Housing Complaint processing.

**Table 7 – Goal Descriptions**

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

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

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

## **AP-35 Projects – 91.220(d)**

### **Introduction**

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

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

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

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

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

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

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

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



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

**Table 8 – Project Information**

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

Basis for Category Priority

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

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

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

#### Obstacles to Meeting Underserved Needs

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

## Projects

### AP-38 Projects Summary

#### Project Summary Information

Table 9 – Project Summary

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

	<b>Goals Supported</b>	Downpayment and Closing Costs Assistance-HOME
	<b>Needs Addressed</b>	Affordability of Owner-Occupied Housing
	<b>Funding</b>	HOME: \$140,000
	<b>Description</b>	Provide HOME funding for down payment and closing costs assistance to twenty-five (25) low to moderate income homebuyers in non-targeted neighborhoods within the DPA program boundaries.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated twenty-five (25) low income families will be provided downpayment and closing costs assistance to purchase homes in non-targeted areas.
	<b>Location Description</b>	Homes must be purchased within the DPA program boundaries area.
	<b>Planned Activities</b>	Down payment and closing costs assistance.
<b>3</b>	<b>Project Name</b>	OKC Housing Assistance Program-Whole House Rehab
	<b>Target Area</b>	
	<b>Goals Supported</b>	Whole-House Rehabilitation-HOME
	<b>Needs Addressed</b>	Quality of Affordable Owner Housing
	<b>Funding</b>	HOME: \$1,727,547
	<b>Description</b>	Provide HOME financial assistance for the whole-house rehabilitation of a minimum of fifteen (15) owner-occupied housing units.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated thirty-five (35) low income homeowners will be assisted with whole house rehabilitation.

	<b>Location Description</b>	City-wide, with priority placed on properties within the SNI and NRSA neighborhoods.
	<b>Planned Activities</b>	Whole House Rehabilitations
<b>4</b>	<b>Project Name</b>	SNI Program Whole House Rehabs-HOME
	<b>Target Area</b>	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	<b>Goals Supported</b>	Whole-House Rehabilitation-HOME
	<b>Needs Addressed</b>	Quality of Affordable Owner Housing
	<b>Funding</b>	HOME: \$996,127
	<b>Description</b>	HOME Funding to support the rehabilitation of fifteen (15) whole-house rehabs for owner-occupied homes in the SNI neighborhoods.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated fifteen (15) low income owner-occupied households within the SNI neighborhoods will receive whole house rehabilitation.
	<b>Location Description</b>	Restricted to Homes within the SNI boundaries.
	<b>Planned Activities</b>	Whole-house Rehabilitations
<b>5</b>	<b>Project Name</b>	SNI Non-Profit Housing Construction
	<b>Target Area</b>	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	<b>Goals Supported</b>	Affordable Housing-AHDP and RHP- CDBG and HOME
	<b>Needs Addressed</b>	Supply of Affordable Owner-Occupied Housing
	<b>Funding</b>	HOME: \$248,313

	<b>Description</b>	HOME funding to support new construction of two (2) home ownership units in SNI Neighborhoods.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Two low income households will achieve homeownership from the proposed activity within the SNI neighborhoods.
	<b>Location Description</b>	Units are located at 147 NE 15th St and 1609 N. Walnut St.
	<b>Planned Activities</b>	Two (2) new units will be constructed on a single lot. The project may be two single family units; or alternatively, a duplex with dual ownership.
<b>6</b>	<b>Project Name</b>	AHDP- Mitchford Project
	<b>Target Area</b>	
	<b>Goals Supported</b>	Affordable Housing-AHDP and RHP- CDBG and HOME
	<b>Needs Addressed</b>	Supply of Affordable Owner-Occupied Housing
	<b>Funding</b>	HOME: \$334,170
	<b>Description</b>	Prior year funding to support the construction of three (3) new single family homes for sale to low and moderate income buyers in the SNI neighborhoods.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Three (3) low income households were expected to achieve homeownership within the SNI target area. Project is delayed, so no beneficiaries are projected for the Second Action Plan Year.
	<b>Location Description</b>	Subject properties are located 1729, 1733, and 1741 Euclid Street
	<b>Planned Activities</b>	New construction of for-sale housing
<b>7</b>	<b>Project Name</b>	CHDO Set-Aside Activities: Loan Pool and New Construction

	<b>Target Area</b>	
	<b>Goals Supported</b>	CHDO New Construction/Rehab- HOME
	<b>Needs Addressed</b>	Supply of Affordable Owner-Occupied Housing
	<b>Funding</b>	HOME: \$1,953,084
	<b>Description</b>	HOME funding provided for new construction or rehabilitation of a minimum of eight (8) housing units through Community Housing Development Organizations (CHDO's) and non-profit housing providers (JPNA, NHS, OKC Housing Services Redevelopment Corp).CHDO Set-aside is allocated to local CHDO's for multiple projects, both rehab and new construction. All funds allocated through the CHDO Loan Pool must be repaid.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated eight (8) low income households will achieve homeownership.
	<b>Location Description</b>	Approximately eight (8) housing units will be constructed or rehabilitated with CHDO set-aside funds during the Second Action Year Plan. Actual estimates of production cannot be provided until all funds have been allocated. Estimating eight (8) units of homeowner housing for low and moderate income families based on historical fund activity.
	<b>Planned Activities</b>	New housing construction and/or rehabilitation
<b>8</b>	<b>Project Name</b>	OKC Housing Assistance Program-Exterior Maintenance
	<b>Target Area</b>	
	<b>Goals Supported</b>	Exterior Maintenance and Storm Shelters-CDBG
	<b>Needs Addressed</b>	Quality of Affordable Owner Housing
	<b>Funding</b>	CDBG: \$1,184,000

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



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

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

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

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

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

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

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

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



	<b>Description</b>	CDBG funds to support park improvements in SNI neighborhoods. \$200,000.00 is allocated for improvements at McKinley Park in the Classen-Ten-Penn SNI neighborhood. The remaining \$401,718.71 is allocated for park improvements at the Harn Homestead in the Culbertson East Highlands SNI neighborhood.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Two (2) parks in the SNI neighborhoods will be assisted with public facility improvements.
	<b>Location Description</b>	Funds are restricted to the SNI neighborhoods. Projects are located at McKinley Park in the Classen Ten-Penn neighborhood and at the Harn Homestead in the Culbertson's East Highlands neighborhood.
	<b>Planned Activities</b>	Public Facilities- Park Improvements
<b>23</b>	<b>Project Name</b>	Public Services- COTPA (Embark) Share-a-Fare Program
	<b>Target Area</b>	
	<b>Goals Supported</b>	Special Needs Transportation Services-CDBG
	<b>Needs Addressed</b>	Transportation Options -Special Needs Population
	<b>Funding</b>	CDBG: \$102,842
	<b>Description</b>	CDBG funding is provided for an estimated 70,000 subsidized taxi fares and bus tokens for approximately 2,700 low and moderate income special needs populations, including the homeless, elderly persons over age 62, and persons with disabilities.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	70,000 discounted taxi fares and bus tokens will be provided to approximately 2,700 persons with special needs.

	<b>Location Description</b>	City-wide
	<b>Planned Activities</b>	Discounted taxi fare and bus coupons for low and moderate income special needs populations.
<b>24</b>	<b>Project Name</b>	Public Services-CAA Graffiti Removal
	<b>Target Area</b>	
	<b>Goals Supported</b>	Graffiti Removal-CDBG
	<b>Needs Addressed</b>	Public Services-Graffiti Removal
	<b>Funding</b>	CDBG: \$15,011
	<b>Description</b>	CDBG funding to support the elimination of graffiti for four hundred (400) locations as a crime prevention activity.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Graffiti will be removed at four hundred (400) locations within low and moderate income neighborhoods. A greater community benefit exists as a crime prevention activity but cannot be quantitatively measured apart from the location of the properties served.
	<b>Location Description</b>	City-wide
	<b>Planned Activities</b>	Graffiti removal
<b>25</b>	<b>Project Name</b>	Public Services-OKC Abandoned Housing
	<b>Target Area</b>	
	<b>Goals Supported</b>	Secure Vacant and Abandoned Properties- CDBG
	<b>Needs Addressed</b>	Address Slum and Blight- Vacant Abandoned Bldgs
	<b>Funding</b>	CDBG: \$68,562
	<b>Description</b>	CDBG funding for interim assistance to secure a minimum of 125 vacant and abandoned properties to eliminate slum and blight on a spot basis.

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

	<b>Goals Supported</b>	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	<b>Needs Addressed</b>	Sustainability Service Provider Facilities-CDBG
	<b>Funding</b>	CDBG: \$1,455,435
	<b>Description</b>	Funding in the amount of \$510,000 has been awarded to the Care Center for rehabilitation of their child advocacy services center for abused children. Additional Funding in the amount of \$945435 is reserved but not yet allocated to support public facilities, housing, infrastructure improvements, and needs of social service providers. Several applications for funding have been received but have not yet been fully vetted by staff.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The Care center provides direct services to approximately eight hundred (800) children annually. An additional 2,400 children are provided advocacy services. In regards to future projects not yet approved, It is estimated that any facility supported will provide benefits to a minimum of two hundred (200) persons annually.
	<b>Location Description</b>	City-wide
	<b>Planned Activities</b>	Rehabilitation and infrastructure
<b>28</b>	<b>Project Name</b>	CAA Small Business Services
	<b>Target Area</b>	
	<b>Goals Supported</b>	Small Business Technical Assistance- CDBG
	<b>Needs Addressed</b>	Economic Opportunities for Low and Moderate Income
	<b>Funding</b>	CDBG: \$39,149
	<b>Description</b>	CDBG funding provided for technical assistance to a minimum of ninety (90) small businesses.
	<b>Target Date</b>	6/30/2017

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated Ninety (90) small businesses will be provided with technical assistance.
	<b>Location Description</b>	City-wide
	<b>Planned Activities</b>	Small business technical assistance.
29	<b>Project Name</b>	HUD Section 108 Loan Repayment
	<b>Target Area</b>	NEIGHBORHOOD STRATEGY AREA
	<b>Goals Supported</b>	Section 108 Loan Assistance- CDBG
	<b>Needs Addressed</b>	Economic Opportunities for Low and Moderate Income
	<b>Funding</b>	CDBG: \$350,000
	<b>Description</b>	The City has been approved for a Section 108 loan to support the development of the 21C Museum Hotel in the historic Film Row District. The assistance received will support the creation of one hundred thirty-eight (138) FTE jobs in the Second Action Plan Year. The allocated funding is the anticipated debt service on outstanding Section 108 loans. In addition to 21C, an Embassy Suites hotel funded in prior years was completed in the Spring 2015, resulting in the creation of seventy-seven (77) FTE jobs reported in the First Action Plan Year. The City will consider other projects for use of Section 108 as opportunities arise. The allocated funding noted below is the anticipated debt service on outstanding Section 108 loans which would be payable to HUD from CDBG entitlement funds if a financed project were to fail. If all loans are repaid timely, no funds will be expended for this activity.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is anticipated that One Hundred Thirty-Five (135) jobs will be created in the Second Action Year Plan period.

	<b>Location Description</b>	The 21C Museum Hotel is located at 900 W. Main Street. Addresses of future projects are yet to be determined.
	<b>Planned Activities</b>	Hotel development and job creation
<b>30</b>	<b>Project Name</b>	Urban Renewal Authority-Economic Opportunity
	<b>Target Area</b>	
	<b>Goals Supported</b>	Multi-Family Rehab- CDBG Affordable Housing-AHDP and RHP- CDBG and HOME
	<b>Needs Addressed</b>	Acquisition/Clearance of Vacant, Blighted Property
	<b>Funding</b>	CDBG: \$788,880
	<b>Description</b>	Funding to increase the sustainability of Oklahoma City Urban Renewal Authority close out districts and local Urban Renewal project areas to include acquisition, disposition, relocation, and Urban Renewal completion to address slum and blight.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The number of program beneficiaries is contingent on the size and scale of projects funded.
	<b>Location Description</b>	Urban Renewal project areas
	<b>Planned Activities</b>	Acquisition, disposition, clearance, relocation and Urban Renewal completion
<b>31</b>	<b>Project Name</b>	CDBG Commercial District Economic Development RLF
	<b>Target Area</b>	
	<b>Goals Supported</b>	Small Business Revolving Loan Fund- CDBG
	<b>Needs Addressed</b>	Economic Opportunities for Low and Moderate Income

	<b>Funding</b>	CDBG: \$750,000
	<b>Description</b>	Provide revolving loan fund (RLF) assistance to a minimum of four (4) businesses or microenterprises to create jobs and/or expand commercial services for low-mod benefit or limited clientele. This activity was capitalized with prior year CDBG funding. No additional contributions are anticipated.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	A minimum of four (4) new or expanding businesses or microenterprises will be supported resulting in job creation and/or job retention. The amount of employees added or retained will vary based upon the size and needs of the businesses supported.
	<b>Location Description</b>	Businesses must be located within the boundaries of a Commercial District Revitalization Program Area or Business Improvement District (excluding the downtown central business district).
	<b>Planned Activities</b>	Financial support for business start-ups and expansions
<b>32</b>	<b>Project Name</b>	Empowerment Zone Staff Support
	<b>Target Area</b>	
	<b>Goals Supported</b>	Empowerment Zone Staffing- CDBG
	<b>Needs Addressed</b>	Economic Opportunities for Low and Moderate Income
	<b>Funding</b>	:
	<b>Description</b>	The City will continue to provide staff support for continued implementation of the Empowerment Zone designation, if the program is extended beyond December 31, 2016 with a future legislative action. No funding is allocated at the present time.
	<b>Target Date</b>	6/30/2017

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The Empowerment Zone designation is set to expire on December 31, 2016. It is not known if it will be extended. No beneficiaries have been identified as the future of the program is uncertain.
	<b>Location Description</b>	Restricted to the EZ eligible boundaries
	<b>Planned Activities</b>	Administration-Staff Support
<b>33</b>	<b>Project Name</b>	Administration-Metro Fair Housing Council
	<b>Target Area</b>	
	<b>Goals Supported</b>	Administration
	<b>Needs Addressed</b>	Administration
	<b>Funding</b>	CDBG: \$82,745
	<b>Description</b>	Funding is provided to the Metro Fair Housing Council to undertake all Fair Housing activities on behalf of the City to include enforcement, education and compliance.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Funding will support approximately 465 Housing Complaint Intakes, 22 Formal Housing Discrimination Complaints, 31 Fair Housing/Fair Lending Rights Seminars, 42 Requests for Reasonable Accommodation or Modification, and 69 Fair Housing Tests.
	<b>Location Description</b>	
	<b>Planned Activities</b>	Fair Housing activities
<b>34</b>	<b>Project Name</b>	Administration-Planning
	<b>Target Area</b>	
	<b>Goals Supported</b>	Administration



	<b>Needs Addressed</b>	Administration
	<b>Funding</b>	CDBG: \$50,000
	<b>Description</b>	Administration-Planning activities to support the CDBG program including preparation of neighborhood plans, the annual Action Plan, the Consolidated Annual Performance Evaluation Report (CAPER) and the five year Consolidated Plan.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Beneficiaries of Planning support will be reported under individual projects and activities.
	<b>Location Description</b>	City-wide
	<b>Planned Activities</b>	Administrative and Planning activities related to plan preparation.
35	<b>Project Name</b>	Administration- CDBG and HOME
	<b>Target Area</b>	
	<b>Goals Supported</b>	Administration
	<b>Needs Addressed</b>	Administration
	<b>Funding</b>	CDBG: \$755,400 HOME: \$455,460
	<b>Description</b>	Administrative expenses for CDBG and HOME program operations and management.
	<b>Target Date</b>	7/16/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Beneficiaries will be reported under individual program activities.

	<b>Location Description</b>	City-wide
	<b>Planned Activities</b>	Program Administration
36	<b>Project Name</b>	ESG Activities
	<b>Target Area</b>	
	<b>Goals Supported</b>	Housing for the Chronically Homeless- ESG
	<b>Needs Addressed</b>	Supportive Housing for the Chronically Homeless Services for Homeless Youth (Age 21 and under) Sustainability of Transitional Housing Increased Employment Rate for CoC Participants Homeless Households with Children Public Facilities, Services and Infrastructure
	<b>Funding</b>	ESG: \$389,641
	<b>Description</b>	ESG Funds will be used for the following Activities: 1) To provide housing and case management resources for up to fifty (50) chronically homeless individuals and veterans. 2) To provide support for the planning and development of one (1) Drop-in facility for homeless youth to be completed in a future program year. 3) To decrease the number of homeless households with children by providing rapid re-housing and prevention resources for eighty (80) families. 4) To reduce evictions by providing legal services for up to ninety (90) individuals and families. 5) To provide health care services to over 1,500 low income and homeless individuals. 6) To provide shelter and outreach services for six hundred (600) youth and elderly individuals, victims of domestic violence, and individuals with mental illness.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is projected that two thousand (2,000) extremely low income homeless households and individuals will access ESG services. This total does not include a proposed Drop-in Center for homeless youth since that activity has not been previously funded and there is no historical data available to project the number of beneficiaries.

	<b>Location Description</b>	City-wide
	<b>Planned Activities</b>	Housing for the chronically homeless, supportive case management and social services, employment assistance, rapid re-housing, homelessness prevention, and a public facility for homeless youth.
<b>37</b>	<b>Project Name</b>	HOPWA Activities
	<b>Target Area</b>	
	<b>Goals Supported</b>	STRMU for Persons with HIV/AIDS- HOPWA TBRA for Persons with HIV/AIDS- HOPWA
	<b>Needs Addressed</b>	Housing Availability-Persons With HIV/AIDS
	<b>Funding</b>	HOPWA: \$544,334
	<b>Description</b>	Tenant Based Rental Assistance (TBRA) will be provided to thirty(30) low or extremely low income households to prevent homelessness. Short Term Rent, Mortgage and Utility (STRMU) assistance to prevent homelessness will be provided for seventy (70) eligible persons or households.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately One Hundred (100) low income households affected by HIV/AIDS will benefit from the proposed activities.
	<b>Location Description</b>	City-Wide
	<b>Planned Activities</b>	Short term rental assistance to prevent homelessness.

## AP-50 Geographic Distribution – 91.220(f)

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

The City of Oklahoma City is the largest city in the State of Oklahoma in both population and land area. Based on 2013 ACS data, The City of Oklahoma City is comprised of just over 610,000 persons contained within a land area of over 620 square miles. The community is racially diverse with a total minority population exceeding 31%. The minority population in Oklahoma City remains in transition. In the 2013 American Community Survey, persons of Hispanic or Latino origin represent 19.3% of the total population. African American persons, formerly the largest minority/ethnic population in Oklahoma City, now comprise 14% of the total population. Black and African American families are disproportionately located in the eastern and northeastern Census tracts. The Hispanic and Latino population continues to be concentrated in the southwest and western Census tracts of the city.

The City of Oklahoma City applied for and received a Neighborhood Revitalization Strategy Area (NRSA) designation from HUD that consists of all or part of 45 low-income census tracts covering an area of approximately 29.5 square miles. In addition, the NRSA contains approximately 20 square miles that lie within an area designated by HUD as both an Enterprise Community and an Empowerment Zone (Round III). The Empowerment Zone designation was extended to December 31, 2016. It is unknown if it will be further extended. 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, 101300, 101400, 101500, 101600, 101900, 102400, 102500, 102600, 102700, 102800, 102900, 103000, 103101, 103102, 103200, 103300, 103400, 103500, 103601, 103602, 103700, 103800, 103900, 104000, 104100, 104200, 104300, 104400, 104600, 104700, 104800, 104900, 105600, 105700, 105800, 1053002, 1053003, 1070012, 1070013, 1070014, 1070021, 1070022, and 1073051.

### Geographic Distribution

Target Area	Percentage of Funds
NEIGHBORHOOD STRATEGY AREA	80

Table 10 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

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

chosen to focus resources strategically in a manner that will allow for noticeable improvement and positive impact over the long term.

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

### **Discussion**

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

# Affordable Housing

## AP-55 Affordable Housing – 91.220(g)

### Introduction

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

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

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

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

The one year housing goals noted below are based on proposed goals and activities for the 2016-2017 Annual Action Plan year. It is anticipated that these annual goals will be largely consistent over the five (5) year term of this Plan, provided that annual allocations from HUD are not substantially reduced. The estimates provided do not include the provision of emergency shelter, transitional shelter, or social

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

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

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

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

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

## Discussion

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

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

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

### Programs to Assist Homeowners:

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

### Projected 2016-2017 Housing Accomplishments:

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



- 15 Public Housing Unit Rehabs
- 100 Persons Provided Rental and/or Utility Assistance

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

As capital improvement funding from HUD continues to decrease, the Oklahoma City Housing Authority (OCHA) continues to struggle with deferred maintenance issues. Although resources are scarce, The City will continue to assist in rehabilitation of public housing units. CDBG funds are provided in the Second Action Plan Year to support the rehabilitation of approximately fifteen (15) public housing units.

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

The City of Oklahoma City will continue to work with OCHA to increase the overall quality of public housing. Presently, the Housing Authority has sufficient resources to maintain and manage their properties; however, are unable to make all of the needed upgrades and repairs. All housing is considered "average" by the Housing Authority. The City will provide CDBG funding for rehabilitation of approximately fifteen (15) public housing units.

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

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

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

Not Applicable

### **Discussion**

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

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

### **Introduction**

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

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

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

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

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

Activities supported in the First Action Year Plan to address homelessness included CDBG and HOME funding for the completion of a twenty (20) unit SRO project on the WestTown homeless campus for persons transitioning to permanent housing. This project has been completed in IDIS and is fully drawn. HOPWA funding is used to support the provision of Short Term Mortgage and Utility Assistance (STRMU) and Tenant Based Rental Assistance (TBRA). ESG funds continue to support housing and case management activities for families and veterans. ESG funding is also committed for rapid re-housing and prevention services for homeless households with children. Lastly, ESG funding supported the creation of one drop-in center for homeless youth in the First Action Plan Year. A second facility is expected to begin next year, and efforts will be made to complete a total of four (4) facilities during the Five (5) year

Consolidated Plan period.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

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

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

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

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

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

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

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

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

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

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

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

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

The assigned case manager will typically contact the landlord or utility company immediately in an effort to pledge assistance to prevent or delay imminent eviction or utility cutoff. If the case manager/Housing Resource Locator deems the housing to be substandard, then the case manager works with the household and the Housing Resource Locator to locate and secure more appropriate housing. Program participants must demonstrate they are capable of earning income adequate to sustain their permanent housing at the conclusion of program services.

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

## **Discussion**

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

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

**AP-70 HOPWA Goals – 91.220 (I)(3)**

<b>One year goals for the number of households to be provided housing through the use of HOPWA for:</b>	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	70
Tenant-based rental assistance	30
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	100

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

### **Introduction**

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

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

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

1. Insufficient understanding 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;
- Building permit fees are waived by policy for nonprofit charitable organizations engaged in the construction or remodeling of one or two family dwellings for the purpose of providing housing assistance to low-income persons or households;
- There are no licensing requirements for builders or professionals except in the case of high-rise structures.

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

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

City Council 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 and for conformance with the City's recently adopted Comprehensive Plan this provides the the City with an opportunity to identify ordinance language that could potentially create an unintended consequence in the provision of fair housing. Problematic language, if found, will be altered as necessary to ensure compliance and equal opportunity.

## **Discussion**

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

## **AP-85 Other Actions – 91.220(k)**

### **Introduction**

The local and federal resources are insufficient to address all needs, even those of high priority. In some instances, there are perceptions in the community that affordable housing will decrease area property values as well as facilitate other societal problems (NIMBY issues). There is a lack of interest from service providers in developing permanent supportive housing for the chronically homeless (lack of developers).

### **Actions planned to address obstacles to meeting underserved needs**

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

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

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

### **Actions planned to foster and maintain affordable housing**

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

Funds for activities that support new housing construction under the HOME program are provided to the Community Housing Development Organization Program (CHDO), and to the Strong Neighborhoods Initiative (SNI) Program. The City provides funding to certified CHDOs based on an open solicitation to CHDOs in good standing. The successful CHDOs are awarded HOME CHDO set-aside funds to construct, and in some cases, rehabilitate existing housing units in targeted neighborhoods. SNI funding for new housing construction is limited to non-profit organizations and is awarded on a competitive basis.

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

A priority for use of HOME and CDBG funding allocated for housing is to reverse patterns of gentrification by incentivizing mixed income housing in and near the economic growth areas of the urban core, including the Downtown District, Bricktown, Core-to-Shore, Midtown, Film Row and Art District areas of the City. A second priority for use of both HOME and CDBG funding for housing is to reverse patterns of low income concentration in certain economically challenged areas of the NRSA by incentivizing mixed income housing through the aggregation of assisted housing activities.

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

Public Housing Modernization is provided through the Oklahoma City Housing Authority (OCHA). OCHA is allocated CDBG funds to make needed repairs to approximately fifteen (15) public housing units annually.

### **Actions planned to reduce lead-based paint hazards**

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

The City funds various activities that fall into the category of residential rehabilitation. Effective September 15, 2000, whenever residential rehabilitation activities funded by the City are conducted, the regulations prescribed for lead-based paint, contained at 24 CFR Part 35 will be the guide for achieving compliance. Under the regulations, the City is required to adopt proper approaches to Lead Hazard evaluation, to provide regulatory notifications to the homeowner, to perform Lead Hazard evaluation, and to follow safe work practices and clearance requirements. For activities involving rehabilitation under Subpart J, Tenant Based Rental Assistance under Subpart M, if any, and Subpart K for Homebuyers and special needs properties, options for remediation of lead based paint and potential funding sources for cleanup will be discussed with the applicant based upon the amount of funds available for each activity.

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

campaigns to have children tested for elevated lead blood levels.

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

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

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

### **Actions planned to reduce the number of poverty-level families**

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

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

The third MAPS initiative was passed by the citizens of Oklahoma City on December 2009. MAPS 3 projects are well underway and will continue the public facilities improvements that were started with the first MAPS vote. MAPS 3 provided funding for a seventy (70) acre downtown regional park, a 4.5 mile electric streetcar route, a new downtown convention center, neighborhood sidewalks and trails,

aquatic centers for seniors, additional improvements to the Oklahoma State Fairgrounds and a white water course on the Oklahoma River. The senior centers, trails, and fairgrounds exhibition center are expected to be completed in the Second Action Plan Year. The streetcar route has been finalized and the contract for construction of the streetcars has been finalized. Land acquisition for the downtown Core to Shore park is nearing completion and Phase I environmental reviews have been completed.

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

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

### **Actions planned to develop institutional structure**

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

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

The City receives assistance in conducting the annual Point-in-Time count from the Homeless Alliance, City Rescue Mission, City Care, Oklahoma City Veterans Administration, Medical Center, The Salvation Army, OKC Metro Alliance, Red Rock Behavioral Health Services, Upward Transitions, Catholic Charities-Sanctuary Women's Development Center, Oklahoma Department of Mental Health and Substance Abuse Services, Sunbeam Family Services, Oklahoma Department of Corrections, Be the Change,

Neighborhood Services Organization, NorthCare, Community Health Centers, OKC Metro Transit, Hope House OKC, Jesus House, Heartline 211, Mental Health Association–Oklahoma, Hope Community Services, Grace Rescue Mission, United States Department of Housing and Urban Development–Oklahoma Field Office, YWCA of Oklahoma City, Oklahoma City Police Department Homeless Outreach Unit, Oklahoma City Planning Department Division of Community Development, Oklahoma City Public Schools, Oklahoma Department of Human Services, and Urban League of Greater Oklahoma City.

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

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

### **Discussion**

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

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

## Program Specific Requirements

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

#### Introduction

**Program Income-**The City of Oklahoma City anticipates a return of approximately \$96,026.91 in CDBG program income prior to June 30, 2016, with an additional \$75,000 anticipated in the Second Action Plan Year (2016-17). \$5,000.00 in 2015 unprogrammed CDBG funds are available for allocation. Oklahoma City does not expect to receive program income during the program year from CDBG capitalized revolving loan funds or new float funded activities. CDBG funds capitalized a \$750,000 revolving loan fund in 2015; however no loan repayments are expected in the First or Second Action Plan Years. Oklahoma City has not invested CDBG funds in float funded activities. Program income that is received will be allocated as follows:

1. Program Income generated from Section 108 Loan investment and repayment accounts will be used to pay Section 108 principal and interest.
2. CDBG program Income generated by the Oklahoma City Housing Assistance Lead Based Paint Testing Program will be reallocated to the Oklahoma City Housing Assistance Program.
3. CDBG funding rebates provided by material suppliers resulting from Oklahoma City Housing Assistance Program activities will be allocated to the Oklahoma City Housing Assistance Program to assist with funding additional Housing Exterior Maintenance projects.
4. Twenty percent (20%) of all CDBG program income will be used to create additional administrative capacity, and CDBG program income may be used to fund administrative expenses during the program year in which it is realized.
5. In accordance with CPD Notice 97-9, III.J., HOME Program Income deposited to the PJ's letter of credit and that creates additional administrative capacity may be used by the PJ for administrative expenses incurred during the Action Year, and any excess administrative capacity will be carried forward to subsequent years.

**Preceding Program Year Income-**Oklahoma City forecasts program income and allocates the forecasted program income in Annual Action Year Plans. All program income is reported in IDIS and in financial reporting to HUD.

**Section 108 Proceeds-**Proceeds from Section 108 Loan Guarantees have been utilized to stimulate economic development and create low and moderate income jobs. At the present time, only one Section 108 Loan Guarantee has not been fully disbursed. The Small Business Assistance Section 108 Loan was established to provide access to capital for small businesses located in the NRSA. Proceeds from loan payments and interest earned on all loan repayment accounts associated with the Section 108 Loan Guarantees are used to make debt service payments.

**Surplus Funds-** The City of Oklahoma City anticipates a return of approximately \$96,026.91 in CDBG



Program Income prior to the beginning of the Second Action Year Plan, with an additional \$75,000 anticipated in 2016-17. A total of \$146,692.80 in 2015 unprogrammed CDBG funds is available for allocation. HOME program income in the amount of \$32,904.60 is anticipated prior to the beginning of the Second Action Year Plan with an additional \$80,000 estimated for 2016-17. A total of \$19,206.21 in 2015 unprogrammed funds is available for allocation.

**Grant Funds Returned**-No CDBG funds have been returned to the letter of credit.

**Income from Float Funded Programs**-Oklahoma City will not utilize float funding for program activities and therefore no income will come from float funded activities.

**Urgent Needs**-No urgent need activities are included in the Second Action Year Plan.

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

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

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

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

**Other CDBG Requirements**

1. The amount of urgent need activities	0
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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. The City of Oklahoma City began its 3-year ratio in the First Action Plan Year. The ratio period will cover the years 2015-16; 2016-17; and 2017-18 (70% of a 3 year average beginning in FY 2015-16 as year one).

80.00%

**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:

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

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

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

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

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

during affordability period provided in the HOME regulations at 92.254(a)(5)(ii)(A)(2).

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

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

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

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

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

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

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

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

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

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

homelessness.

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

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

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

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

5. Describe performance standards for evaluating ESG.

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

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

## Discussion

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

In 2013, the City of Oklahoma City also joined the 100,000 Homes Campaign in an effort to move the most medically frail, chronically homeless individuals into permanent housing using a housing first approach. To accomplish this, members of the chronically homeless population are initially given a

vulnerability index survey to determine their health issues. Those that are determined to be the most medically frail are prioritized for immediate placement into housing. A case management committee comprised of various service providers identifies a case manager to work with each individual. Which provider the case manager is affiliated with depends on the needs of the individual being housed.

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

## Attachments

## Grantee Unique Appendices

### 2016-17 SECOND ANNUAL ACTION YEAR PLAN

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

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

**Question: Please explain more about SNI**

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

**Question: Does SNI include Economic Development?**

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

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

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

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

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

**Comment: When building sidewalks, focus on specific neighborhoods.**

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

**Question: When will the proposed budget be presented and discussed?**

Staff responded that the public will be able to respond to allocation recommendations at the Citizens Committee meeting on February 16<sup>th</sup> and at the Neighborhood Conservation Committee on March 1<sup>st</sup>.

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

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

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

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

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

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

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

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

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

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

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



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

**Question: Is there Embark funding available for more routes?**

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

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

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

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

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

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

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

## 2016-17 SECOND ANNUAL ACTION YEAR PLAN

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

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

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

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

**Question: How does the SNI business façade program work?**

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

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

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

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

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

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

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

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

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

# **APPENDIX 1**

## **CONSOLIDATED PLAN TIMELINE**

**TENTATIVE CALENDAR FOR THE  
2016-17 CONSOLIDATED PLAN SECOND ACTION YEAR**

**2015**

- December 18 Submit *notice of public hearing*/planning input session OPUBCO
- December 23 Notice published of public hearing/planning input sessions to be held at Sunbeam Family Services, 2:00 pm, January 7, 2016 and 6:00 pm January 12, 2016.

**2016**

- January 7 Conduct public hearing/planning input session, 2:00 p.m. (Sunbeam Family Services)
- January 12 Conduct public hearing/planning input session, 6:00 p.m. (Sunbeam Family Services)
- January 19 Citizens Committee for Community Development meeting to brief the committee on the citizen input meeting(s), anticipated funding available, and discussion of funding priorities for the 2016-17 Consolidated Plan Second Action Year
- February 5 CD Staff meeting to finalize funding priorities and recommendations for presentation to CCCD
- February 16 Citizen Committee for Community Development meets to finalize funding priorities for the 2016-17 Consolidated Plan Second Action Year, and to approve final funding recommendations for consideration by the Neighborhood Conservation Committee
- March 1 Consideration of funding recommendations by the Neighborhood Conservation Committee
- March 16 Combined Notice submitted to OPUBCO for publication (*Combined Notice for 30-day comment period and Notice of Public Hearing 4/26*)
- March 25 Publication of Combined Notice of 30-day comment period and Notice of Public Hearing.
- April 19 Council Documents due to the Clerk's off for April 26 agenda.
- April 26 City Council public hearing and action on the Consolidated Plan Second Action Year (Alternative Date May 3, 2016)
- May 9-13 Submit 2016-17 Consolidated Plan Second Action Year to HUD

## **APPENDIX 2**

### **CITIZEN PARTICIPATION COMMENTS**

## **2016-17 SECOND ANNUAL ACTION YEAR PLAN**

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

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

### **Question: Please explain more about SNI**

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

### **Question: Does SNI include Economic Development?**

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

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

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

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

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

**Comment: When building sidewalks, focus on specific neighborhoods.**

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

### **Question: When will the proposed budget be presented and discussed?**

Staff responded that the public will be able to respond to allocation recommendations at the Citizens Committee meeting on February 16<sup>th</sup> and at the Neighborhood Conservation Committee on March 1<sup>st</sup>.

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



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

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

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

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

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

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

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

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

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

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

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

**Question: Is there Embark funding available for more routes?**

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

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

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

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

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

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

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

## 2016-17 SECOND ANNUAL ACTION YEAR PLAN

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

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

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

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

**Question: How does the SNI business façade program work?**

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

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

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

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

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

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**APPENDIX 3**  
**GLOSSARY OF TERMS**

## *Glossary*

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

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



**APPENDIX 4**

**ANNUAL OBJECTIVES TABLE**

## Consolidated Plan Objectives

### Decent Housing Activity Objectives Descriptions

2016-2017  
Objective

<i>Quality of Affordable Owner-Occupied Housing</i>	
Housing Assistance Program- Whole House Rehab (HOME)	35
Housing Exterior Maintenance Program and SNI Storm Shelter Program (CDBG)	50
CAA Emergency Home Repair Program (CDBG)	100
<b>SNI</b> Whole House Rehabs (HOME)	15
<i>Quality of Public Housing</i>	
Rehabilitation of Public Housing Units (CDBG)	15
<i>Affordability of Owner-Occupied Housing</i>	
Targeted Area Down Payment Assistance (HOME)	35
Non-Target Area Down Payment Assistance (HOME)	25
<i>Supply of Affordable Owner-Occupied Housing</i>	
CHDO Set-Aside-New Construction of Single Family Homes (HOME)	8
OCURA Affordable Housing Development (CDBG)	1
Non-Profit Housing Construction- SNI (HOME)	3
<i>Supply of Affordable Rental Housing</i>	
Central Urban Development (Forest Village)- Rental Housing Program (HOME) <i>(benefit to be reported in 2015-16 program year- 4 units)</i>	0
Meadowcliff Senior Apartments –LIHTC (CDBG) <i>(In planning. will not be completed 2016-17)</i>	0
Winds House Rehabilitation (CDBG)	TBD

<i>Supply of Affordable Housing for Homebuyers and Acquisition/Rehab for Homebuyers-AHDP</i>	
Mitchford Single Family Homes For Sale (HOME)	3
<i>Availability of Housing for Persons with HIV/AIDS</i>	
Short Term Rent, Mortgage, and Utility Assistance to Prevent Homelessness (HOPWA)	70
Tenant Based Rental Assistance to Prevent Homelessness (HOPWA)	30
<i>Supportive Housing for the Chronically Homeless</i>	
Housing and Case Management Resources for the Chronically Homeless, Families and Veterans (ESG)	50
<i>Sustainability of Transitional Housing</i>	
Reduce evictions for individuals and families by providing legal services (ESG)	90
<i>Provision of Emergency Shelter and services for at-risk populations</i>	
Provide shelter and outreach services to homeless youth and seniors, victims of domestic violence, and individuals with mental illness (ESG)	600
Provide health care services to low income and homeless individuals (ESG)	1500
<i>Housing Opportunity for Homeless Households with Children</i>	
Provide Rapid Re-Housing and Prevention Services for Homeless Households With Children (ESG)	80

**2016-2017  
Objective**

**Suitable Living Environment Activity Objectives Description**

<i>Improve quality and sustainability of neighborhood health</i>	
Funds to trim and/or remove hazardous trees that pose a threat to personal and public safety in the SNI neighborhoods (CDBG)	20
Funds to provide general public services education programs for youth, crime and health topics in SNI Neighborhoods. (CDBG)	100

<i>Services for Homeless Youth</i>	
Development of a Drop-In Center for Homeless Youth (ESG) ( <i>In Planning. will not be completed in 2016-17</i> )	0
<i>Public Facilities, Services, and Infrastructure Improvements</i>	
Midtown Neighborhood Improvements (CDBG)	1
Funds to provide legal ownership assistance to homeowners and non-profits within SNI neighborhoods (CDBG)	35
Funds to provide sidewalks and infrastructure within the SNI neighborhoods (CDBG)	50
Tree Planting in SNI neighborhoods (CDBG)	50
Funds to support park improvements in SNI neighborhoods (CDBG)	2
Care Center Public Facility for Abused Children (CDBG)	1
<i>Strengthen Neighborhood Capacity</i>	
SNI Neighborhood-led improvement projects (CDBG)	3
Funds to support after-school tutoring and enrichment programs for students in the two (2) SNI elementary schools (CDBG)	500
<i>Acquisition/Clearance of Vacant, Blighted Property</i>	
Urban Renewal Authority- Acquisition, Disposition, Relocation, and Completion to Address Slum and Blight (CDBG)	TBD
<i>Graffiti Removal</i>	
Remove Graffiti in Low-Moderate Income Neighborhoods to Prevent Crime (CDBG)	400
<i>Transportation Options for Special Needs Population</i>	
COTPA (EMBARC) Share-A-Fare Program-Subsidized Bus and Taxi Service for Special Needs Population (CDBG) <i>70,000 fares/tokens to approx. 2700 beneficiaries</i>	2700
<i>Address Slum and Blight</i>	
Secure Vacant and Abandoned Properties (CDBG)	125

<i>Sustainability of Service Provider Facilities</i>	
Community Development Public Facilities Program (CDBG)- <i>Projects not yet fully vetted</i>	TBD

<b>Economic Opportunity Activity Objectives Description</b>	<b>2016-2017 Objective</b>
<i>Economic Opportunities for Low and Moderate Income Residents(4)</i>	
CAA Small Business Services Program- Technical Assistance (CDBG)	90
Commercial District Revitalization Program for Businesses-Economic Development Revolving Loan Fund. (CDBG)	4
HUD Section 108 Loan Program- 21c Museum Hotel and Debt Service Reserve in support of job creation (CDBG)	138
Empowerment Zone Staff Support (as needed thru December 31, 2016) (CDBG)	0

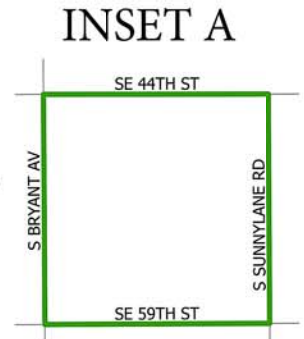
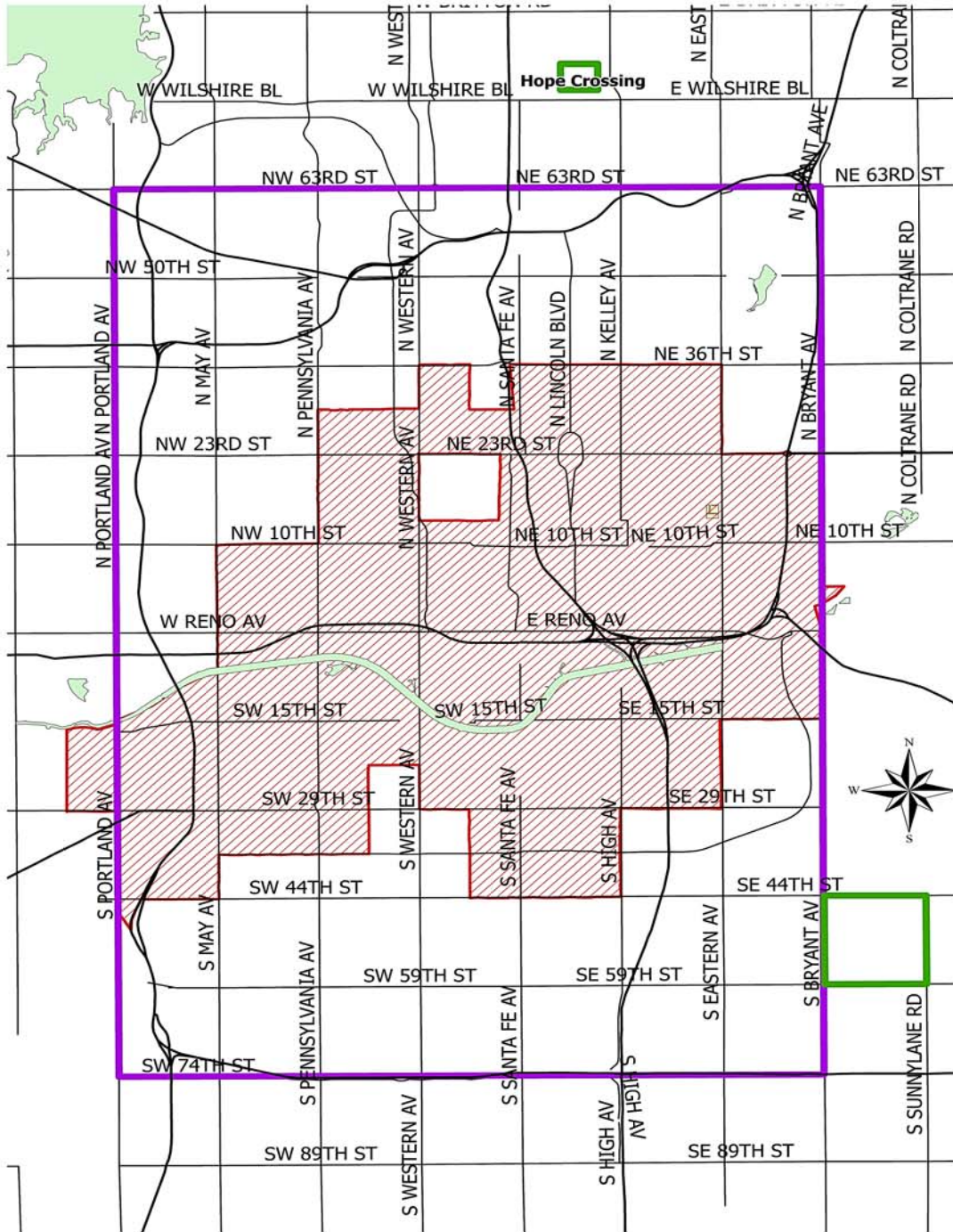
**APPENDIX 5**

**DOWNPAYMENT ASSISTANCE PROGRAM**

**BOUNDARIES**

# OKLAHOMA CITY DOWN PAYMENT ASSISTANCE PROGRAM GUIDELINES

## EXHIBIT 1



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



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

## **APPENDIX 6**

### **SF-424 AND CERTIFICATIONS (COPIES)**





# SF 424

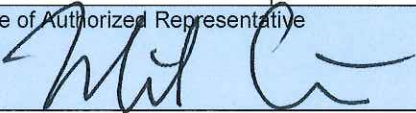
The SF 424 is part of the Annual Action Plan. SF 424 form fields are included in this document.

## SF 424

Complete the fillable fields (blue cells) in the table below. The other items are pre-filled with values from the Grantee Information Worksheet.

Date Submitted		Applicant Identifier		Type of Submission	
Date Received by state N/A		State Identifier		Application	Pre-application
Date Received by HUD		Federal Identifier		<input type="checkbox"/> Construction	<input type="checkbox"/> Construction
				<input checked="" type="checkbox"/> Non Construction	<input type="checkbox"/> Non Construction
<b>Applicant Information</b>					
Oklahoma City		OK402268 Oklahoma City			
Planning Department		Organizational DUNS no. 014104777			
420 W Main St., Suite 920		City of Oklahoma City			
Oklahoma City	Oklahoma	Planning Department			
73102	Country U.S.A.	Community Development Division			
<b>Employer Identification Number (EIN):</b>		Oklahoma County			
<b>736005356</b>		Program Year Start Date 07/01/16			
<b>Applicant Type:</b>		<b>Specify Other Type if necessary:</b>			
Local Government: City		N/A			
<b>Program Funding</b>		<b>U.S. Department of Housing and Urban Development</b>			
Catalogue of Federal Domestic Assistance Numbers; Descriptive Title of Applicant Project(s); Areas Affected by Project(s) (cities, Counties, localities etc.); Estimated Funding					
<b>Community Development Block Grant</b>		14.218 Entitlement Grant			
CDBG grant programs activities include: Housing Exterior Maintenance Program, SNI Storm Shelter Program, CAA Emergency Home Repair Program, rehabilitation of public housing units, Oklahoma City Urban Renewal Authority affordable housing development, Winds House rehab, Meadowcliff Sr. Apts, City Care, hazardous tree removal, public services education, Midtown lighting improvements, legal assistance, infrastructure, tree planting, park improvements, after-school programming, Urban Renewal acquisition and disposition, CAA Graffiti Removal, COTPA Share-A-Fare Program, Abandoned housing board-ups, CDBG CD Sustainability Program, CAA Small Business Assistance, CDRP Revolving Loan Fund, Section 108 Loan Guarantee Repayment, Metropolitan Fair Housing, Planning & Admin.		City of Oklahoma City			
\$4,365,726.00	\$Additional HUD Grant(s) Leveraged	Describe			
\$Additional Federal Funds Leveraged		\$Additional State Funds Leveraged			
\$Locally Leveraged Funds		\$Grantee Funds Leveraged			
\$Anticipated Program Income		Other (Describe)			
Total Funds Leveraged for CDBG-based Project(s)					

<b>Home Investment Partnerships Program</b>		14.239 HOME	
HOME program activities include the Housing Assistance Program, SNI whole house rehabs, Paseo Housing acquisition/rehab, Down Payment Assistance, Community Housing Development Organizations, Non-profit housing construction, Mitchford single family homes, and Administration		City of Oklahoma City	
\$1,785,041.00	\$Additional HUD Grant(s) Leveraged	Describe	
\$Additional Federal Funds Leveraged		\$Additional State Funds Leveraged	
\$Locally Leveraged Funds		\$Grantee Funds Leveraged	
\$Anticipated Program Income		Other (Describe)	
Total Funds Leveraged for HOME-based Project(s)			
<b>Housing Opportunities for People with AIDS</b>		14.241 HOPWA	
HOPWA program activities include housing and services for persons with HIV/AIDS		City of Oklahoma City	
\$544,334.00	\$Additional HUD Grant(s) Leveraged	Describe	
\$Additional Federal Funds Leveraged		\$Additional State Funds Leveraged	
\$Locally Leveraged Funds		\$Grantee Funds Leveraged	
\$Anticipated Program Income		Other (Describe)	
Total Funds Leveraged for HOPWA-based Project(s)			
<b>Emergency Shelter Grants Program</b>		14.231 ESG	
Emergency Solutions Grant activities include programs to provide services and transportation to the homeless.		Description of Areas Affected by ESG Project(s)	
\$388,987.00	\$Additional HUD Grant(s) Leveraged	Describe	
\$Additional Federal Funds Leveraged		\$Additional State Funds Leveraged	
\$Locally Leveraged Funds		\$Grantee Funds Leveraged	
\$Anticipated Program Income		Other (Describe)	
Total Funds Leveraged for ESG-based Project(s)			
Congressional Districts of:		Is application subject to review by state Executive Order 12372 Process?	
03,04,05	03,04,05	<input type="checkbox"/> Yes	This application was made available to the state EO 12372 process for review on DATE
Is the applicant delinquent on any federal debt? If "Yes" please include an additional document explaining the situation.		<input checked="" type="checkbox"/> No	Program is not covered by EO 12372
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A	Program has not been selected by the state for review

Person to be contacted regarding this application		
Aubrey		Hammontree
Planning Director	Phone 405-297-1629	Fax 405-297-3796
Aubrey.Hammontree@okc.gov	www.okc.gov	Other Contact:
Signature of Authorized Representative	Mick Cornett, Mayor	Date Signed
		4-26-16

## 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, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

**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, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

**Drug Free Workplace** -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about –
  - (a) The dangers of drug abuse in the workplace;
  - (b) The grantee's policy of maintaining a drug-free workplace;
  - (c) Any available drug counseling, rehabilitation, and employee assistance programs; and
  - (d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will -
  - (a) Abide by the terms of the statement; and
  - (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted:
  - (a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
  - (b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

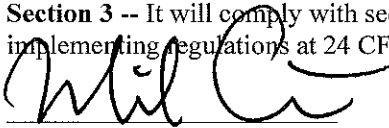
**Anti-Lobbying** -- To the best of the jurisdiction's knowledge and belief:

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 CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.


04/26/16  
 \_\_\_\_\_  
 Signature/Authorized Official Date  
 Mayor  
 \_\_\_\_\_  
 Title

Low/Mod Ratio Cycle:  
Year 1 – 2015-16 1st Action Year  
Year 2 – 2016-17 2nd Action Year  
Year 3 – 2017-18 3rd Action Year

### Specific CDBG 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 housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

**Following a Plan** -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) 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 certifies that 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 activities which the grantee certifies are designed to meet other community development needs having a 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);
2. **Overall Benefit.** The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) , (a period specified by the grantee consisting 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.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, 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.

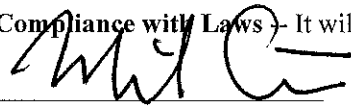
**Excessive Force** -- It has adopted and is enforcing:

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 USC 2000d), the Fair Housing Act (42 USC 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.

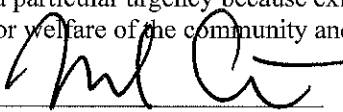
  
\_\_\_\_\_  
Signature/Authorized Official                      04/26/16  
Date

Mayor  
\_\_\_\_\_  
Title

**OPTIONAL CERTIFICATION  
CDBG**

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 a 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 a 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.

  
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Signature/Authorized Official                      04/26/16  
Date

Mayor  
\_\_\_\_\_  
Title

**Specific HOME Certifications**

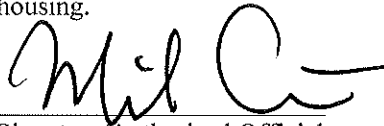
The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

**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.

**Appropriate Financial Assistance** -- 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.



04/26/16

Signature/Authorized Official

Date

Mayor

Title



## ESG Certifications

The Emergency Shelter Grantee certifies that:

**Major rehabilitation/conversion** -- It will maintain any building for which assistance is used under the ESG program as a shelter for homeless individuals and families for at least 10 years. If the jurisdiction plans to use funds for rehabilitation (other than major rehabilitation or conversion), the applicant will maintain any building for which assistance is used under the ESG program as a shelter for homeless individuals and families for at least 3 years.

**Essential Services and Operating Costs** -- Where assistance involves essential services or maintenance, operation, insurance, utilities and furnishings, it 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 as long as the same general population is served.

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

**Supportive Services** -- It will assist homeless individuals in obtaining appropriate supportive services, including permanent housing, medical and mental health treatment, counseling, supervision, and other services essential for achieving independent living, and other Federal State, local, and private assistance.

**Matching Funds** -- It will obtain matching amounts required under 24 CFR 576.51.

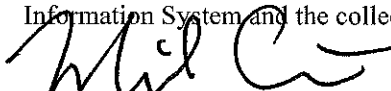
**Confidentiality** -- It will develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or 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, it will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, operating facilities, and providing services assisted through this program.

**Consolidated Plan** -- It is following a current HUD-approved Consolidated Plan or CHAS.

**Discharge Policy** --- It has established a policy for the discharge of persons from publicly funded institutions or 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.

**HMIS** -- It will comply with HUD's standards for participation in a local Homeless Management Information System and the collection and reporting of client-level information.



Signature/Authorized Official

04/26/16

Date

Mayor

Title

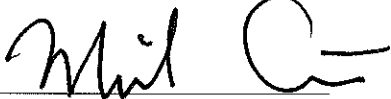
**HOPWA Certifications**

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 plan:

1. For at least 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.



\_\_\_\_\_  
Signature/Authorized Official

04/26/16

\_\_\_\_\_  
Date

Mayor

\_\_\_\_\_  
Title

## APPENDIX TO CERTIFICATIONS

### INSTRUCTIONS CONCERNING LOBBYING AND DRUG-FREE WORKPLACE REQUIREMENTS:

#### A. 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.

#### B. Drug-Free Workplace Certification

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
4. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).
5. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph three).
6. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)  
420 West Main Street, Oklahoma City, Oklahoma County, Oklahoma, 73102

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Check \_\_\_ if there are workplaces on file that are not identified here.

The certification with regard to the drug-free workplace is required by 24 CFR part 24, subpart F.

7. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

"Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

"Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

"Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

"Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All "direct charge" employees; (ii) all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and (iii) temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

**APPENDIX 7**  
**CITY COUNCIL RESOLUTION**

## RESOLUTION

RESOLUTION APPROVING THE 2016-2017 CONSOLIDATED PLAN SECOND ACTION YEAR PLAN, AND APPROVING NEW FORMULA GRANT FUNDING ALLOCATIONS FOR THE COMMUNITY DEVELOPMENT BLOCK GRANT \$4,365,726; THE HOME INVESTMENT PARTNERSHIPS PROGRAM \$1,785,041; EMERGENCY SOLUTIONS GRANT PROGRAM \$388,987; THE HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS \$544,334; AND PROVIDING FOR THE ALLOCATION OF ESTIMATED COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM INCOME AND PROGRAM FUNDS RECAPTURED FROM PRIOR YEARS OF APPROXIMATELY \$247,719.71 AND HOME INVESTMENT PARTNERSHIPS PROGRAM INCOME AND ESTIMATED PROGRAM FUNDS RECAPTURED FROM PRIOR YEARS OF APPROXIMATELY \$94,110.81; AND PROVIDING FOR THE ALLOCATION OF 2016-2017 COMMUNITY DEVELOPMENT BLOCK GRANT ESTIMATED PROGRAM INCOME OF \$75,000 AND ESTIMATED 2016-2017 HOME INVESTMENT PARTNERSHIPS PROGRAM INCOME OF \$80,000; APPROVING APPLICATION DOCUMENTS AND CERTIFICATIONS, U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD) GRANT AGREEMENTS AND OPERATING AGREEMENTS WITH SUB-GRANTEES, INCLUDED IN ATTACHMENT "A", INCLUDING THE COMMUNITY ACTION AGENCY, OKLAHOMA CITY URBAN RENEWAL AUTHORITY, OKLAHOMA CITY HOUSING AUTHORITY, METROPOLITAN FAIR HOUSING COUNCIL, AND CENTRAL OKLAHOMA TRANSPORTATION AND PARKING AUTHORITY; PROVIDING INTEREST EARNINGS ON UNEXPENDED SECTION 108 LOAN ACCOUNTS SHALL BE USED FOR DEBT SERVICE ON SECTION 108 LOANS; AND AUTHORIZING EXECUTION OF NECESSARY DOCUMENTS.

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

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

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

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

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

**WHEREAS**, FY 2016-17 will be the second year of a three year averaging period to achieve the requirement to spend 70% of CDBG funds to benefit low/moderate income persons, except as otherwise allowed in a NRSA.

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

1. The proposed 2016-17 Consolidated Plan Second Action Year Plan is adopted for the period July 1, 2016 through June 30, 2017.
2. The allocations of funds for the Community Development Block Grant and HOME Investment Partnerships Program, Emergency Solutions Grant, Housing Opportunities for Persons with AIDS program, program income, and recaptured funds from prior years attached hereto and reflected in the Second Action Year Plan are approved.
3. The Mayor is authorized to execute the application documents, to make the required certifications, and to execute the HUD grant agreements.
4. The Mayor and/or his designee, the Community Development Division manager in the Planning Department, is authorized to sign documents certifying a project is in conformance with the Consolidated Plan.
5. The Mayor is authorized to execute operating agreements with sub-grantees to whom funds have been allocated in Attachment "A" that include the Community Action Agency, Oklahoma City Urban Renewal Authority, Oklahoma City Housing Authority, Metropolitan Fair Housing Council and Central Oklahoma Transportation and Parking Authority.

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

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

**ADOPTED** by the Council and **APPROVED** by the Mayor of The City of Oklahoma City this 26th day of April, 2016.

ATTEST:  
  
CITY CLERK



  
MAYOR

**REVIEWED** as to form and legality

  
ASSISTANT MUNICIPAL COUNSELOR

**ATTACHMENT "A"**

**FUNDING RECOMMENDATIONS**

**COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)**

Sources of Funds

Community Development Block Grant 2016-17	\$4,365,726.00
Estimated Recaptured Funds	\$146,692.80
Unprogrammed Funds (2015-16)	\$5,000.00
Estimated Program Income (2015-16)	\$96,026.91
Estimated Program Income (2016-17)	\$75,000.00
<hr/>	
Total Sources of CDBG Funds	\$4,688,445.71

**HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME)**

Sources of Funds

Home Investment Partnerships Program 2016-17	\$1,785,041.00
Recaptured Program Funds	\$19,206.21
Unprogrammed Funds (2015-16)	\$32,904.60
Estimated Program Income (2015-16)	\$42,000.00
Estimated Program Income (2016-17)	\$80,000.00
<hr/>	
Total Sources of HOME Funds	\$1,959,151.81

**EMERGENCY SOLUTIONS GRANT PROGRAM (ESG)**

ESG funds allocated for 2016-17	\$388,987.00
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**HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS (HOPWA)**

HOPWA funds allocated for 2016-17	\$544,334.00
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**APPLICATIONS OF FUNDS**

New Allocations for the 2016-17 Second Action Year are:

**CDBG:**

**Decent Housing**

Oklahoma City Housing Assistance Program	\$1,184,000.00
Oklahoma City Housing Authority	\$234,897.00
Community Action Agency (CAA) Emergency Home Repair	\$587,242.00



**Suitable Living Environment**

Strong Neighborhoods Initiative	\$779,717.71
COTPA (Embark) Share-A-Fare	\$102,842.00
Community Action Agency Graffiti Removal	\$15,011.00
Oklahoma City Abandoned Housing	\$68,562.00

**Economic Opportunity**

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

**Administration**

Planning and Administration	\$805,400.00
Metropolitan Fair Housing Council	\$82,745.00

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**TOTAL ALLOCATION OF CDBG FUNDS** **\$4,688,445.71**

**PRIOR YEAR CDBG PROJECTS/ACTIVITIES TO BE CARRIED FORWARD TO 2016-17 ALONG WITH ANY REMAINING FUNDS:**

- Oklahoma City Housing Assistance Program /Storm Shelter-Safe Rooms
- Community Action Agency Emergency Home Repair
- OCURA Affordable Housing Development
- OCURA Program Funds
- CDBG Affordable Housing Rehab Program
- CDBG Winds House
- CDBG Meadowcliff Senior Apartments
- CDBG City Care
- Strong Neighborhoods Initiative Program
- Midtown Neighborhood Improvement Project
- CDBG Community Development Facilities Program
- CDBG Economic Development Commercial District Revolving Loan Fund
- Section 108 Loan Repayment

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

- Community Action Agency Small Business Services
- Oklahoma City Housing Assistance Program
- Oklahoma City Housing Authority

Central Oklahoma Transportation and Parking Authority Share-A-Fare  
 Oklahoma City Abandoned Housing Program  
 Community Action Agency Graffiti Removal  
 Urban Renewal Authority  
 Metropolitan Fair Housing Council  
 Planning and Administration

**HOME:**

Down Payment Assistance Program (Targeted Areas-80%)	\$560,000.00
Down Payment Assistance Program (Non-Targeted Areas-20%)	\$140,000.00
OKC Housing Assistance Program	\$700,000.00
Strong Neighborhoods Initiative (SNI)Program	\$104,891.56
Community Housing Development Organization (CHDO) set-aside	\$267,756.15
Planning and Administration	\$186,504.10

**TOTAL ALLOCATION OF HOME FUNDS** **\$1,959,151.81**

**PRIOR YEAR HOME PROJECTS/ACTIVITIES TO BE CARRIED FORWARD TO 2016-17 ALONG WITH ANY REMAINING FUNDS**

Community Housing Development Organization Set-asides  
 Community Housing Development Organization Loan Pool funds  
 Rental Housing Program – Central Urban Development  
 Strong Neighborhoods Initiative (SNI) Program  
 Non-Profit Housing Construction  
 Affordable Housing Development Program – Mitchford Homes  
 Oklahoma City Housing Assistance Program  
 Administration

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

Targeted Area DPA Program  
 General (Non-target area) DPA Program  
 Homeless Alliance SRO's  
 Ron Walters Homes

### **Emergency Solutions Grant (ESG)**

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

**Total Allocation of ESG: \$388,987.00**

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

HOPWA funds are awarded through an Open Solicitation process. The Continuum of Care Committee will make recommendations for funding. These recommendations will be presented to the Social Services Committee of the City Council for their recommendations before being presented to the City Council for final approval.

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

**Total Estimated Allocation of HOPWA: \$544,334.00**

### **Program Income**

Program income for the 2016-17 Second 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. CDBG program income generated by the Oklahoma City Housing Assistance Lead Based Testing Paint Program will be reallocated to the Oklahoma City Housing Assistance Program.
3. CDBG funding rebates provided by material suppliers resulting from Oklahoma City Housing Assistance Program activities will be allocated to the Oklahoma City Housing Assistance Program to assist with funding additional Housing Exterior Maintenance projects.
4. CDBG program income will be used to create additional administrative capacity, and CDBG program income may be used to fund administrative expenses during the program year in which it is realized.

In accordance with CPD Notice 97-9, III.J., HOME Program Income deposited to the PJ's letter of credit and that creates additional administrative capacity may be used by the PJ for administrative expenses incurred during the Action Year, and any excess administrative capacity will be carried forward to subsequent years.

**APPENDIX 8**

**ESG POLICIES AND PROCEDURES**



**OKLAHOMA CITY HOMELESS ASSISTANCE PROGRAMS**  
**EMERGENCY SOLUTIONS GRANT**

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# **SECTION I: PROGRAM DESCRIPTION**

## **OVERVIEW**

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

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

## **PHILOSOPHY**

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

## **PROGRAM COMPONENTS**

### **Centralized Intake**

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

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

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



## **Prevention**

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

## **Rapid Rehousing**

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

## **Outreach**

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

## **Emergency Shelter**

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

## **Housing Locator /Inspection Services**

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

## **Direct Financial Assistance**

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

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

## **HMIS and other Data Collection**

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

## **Administration**

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

# **SECTION II: PROGRAM ELIGIBILITY**

## **A. PARTICIPANT ELIGIBILITY**

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

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

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

- **Income**

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

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

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

- **Case Management/Assessment**

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

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

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

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

- **Housing Status**

***Prevention:***

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

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

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

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

(\* - see definitions in Attachment A)

### ***Rapid Re-housing***

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

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

(\* - see definitions in Attachment A)

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

- **Connection to Mainstream and Other Resources**

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

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

## **B. PROGRAM ADMISSION**

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

## **SECTION III: PROGRAM RULES AND REGULATIONS**

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

### **A. PROGRAM AGREEMENT**

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

### **B. FISCAL PLANNING**

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

## **C. GRIEVANCES/APPEALS**

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

## **D. TERMINATION/PROGRAM EXIT**

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

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

## **SECTION IV: PREVENTION/RE-HOUSING ELIGIBLE ACTIVITIES**

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

### **A. PRIORITIES**

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

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

### **1. Prevention Assistance**

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

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

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

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

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

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

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

### **2. Rapid Re-housing Assistance**

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

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

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

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

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

## **B. FINANCIAL ASSISTANCE**

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

Financial assistance is limited to the following activities:

### **Short-term rental assistance**

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



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

### **Medium-term rental assistance**

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

### **Rental Arrears**

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

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

### **Security and Utility deposits**

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

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

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

### **Utility Payments**

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

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

### **Moving cost assistance**

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

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

### **Motel/Hotel vouchers**

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

## **C. PARTICIPANT SHARED COSTS**

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

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

## **D. FINANCIAL ASSISTANCE CAPS**

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

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

## **E. SUPPORT SERVICES**

### **APPROPRIATE HOUSING**

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

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

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

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

### **EMPLOYMENT LINKAGES**

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

### **ENROLLMENT IN COMMUNITY BENEFITS**

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

### **LEGAL ASSISTANCE AND LINKAGES**

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

### **ACCESS TO PUBLIC EDUCATION**

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

### **Health Services**

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

### **MENTAL HEALTH/SUBSTANCE ABUSE COUNSELING**

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

## **F. SERVICE LEVELS AND COORDINATION**

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

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

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

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

## SECTION V: INELIGIBLE AND PROHIBITED ACTIVITIES

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

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

## SECTION VI: EMERGENCY SHELTER/OUTREACH ELIGIBLE ACTIVITIES

## A. STREET OUTREACH

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

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

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

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

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

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

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

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

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

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

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

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

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

## B. EMERGENCY SHELTER

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

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

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

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

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

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

Components that can be funded under education services are:

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



- Supplies
- Counseling
- Referral to community resources

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

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

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

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

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

- Child support
- Guardianship
- Paternity

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

Eligible component services are:

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

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

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

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

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

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

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

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

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

Detox and other inpatient treatments are not eligible for funding.

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

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

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

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

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

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

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

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

## **C. LIMITS ON EXPENDITURES**

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

## **SECTION VII: ADMINISTRATION AND HMIS PROCEDURES**

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

### **A. QUALITY ASSURANCE**

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

## **B. CLIENT PARTICIPATION**

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

## **C. DATA COLLECTION**

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

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

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

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

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

## **D. CONFIDENTIALITY**

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

## **E. RECORD RETENTION**

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

## **F. REIMBURSEMENT PROCEDURES**

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

# **SECTION VIII: PROGRAM FUNCTIONS**

## **A. ROLES & RESPONSIBILITIES**

1) Coordinated Assessment

Responsibilities Include:

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

*\* 211 will provide 24/7 assessment coverage*

## 2) Prevention

### Responsibilities Include:

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

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

## 2) Rapid Re-housing Services

### Responsibilities Include:

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

## 3) HOUSING RESOURCE LOCATOR

### Responsibilities Include:



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

**All ESG partners are required to:**

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

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

## **SECTION IX: ATTACHMENTS**

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### **ATTACHMENT A: HUD HOMELESS DEFINITIONS AND RECORDKEEPING REQUIREMENTS**



# Homeless Definition

<b>CRITERIA FOR DEFINING HOMELESS</b>	<b>Category 1</b>	Literally Homeless	<p>(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> <li>(i) Has a primary nighttime residence that is a public or private place not meant for human habitation;</li> <li>(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></li> <li>(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</li> </ul>
	<b>Category 2</b>	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"> <li>(i) Residence will be lost within 14 days of the date of application for homeless assistance;</li> <li>(ii) No subsequent residence has been identified; <u>and</u></li> <li>(iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing</li> </ul>
	<b>Category 3</b>	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"> <li>(i) Are defined as homeless under the other listed federal statutes;</li> <li>(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;</li> <li>(iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; <u>and</u></li> <li>(iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers</li> </ul>
	<b>Category 4</b>	Fleeing/ Attempting to Flee DV	<p>(4) Any individual or family who:</p> <ul style="list-style-type: none"> <li>(i) Is fleeing, or is attempting to flee, domestic violence;</li> <li>(ii) Has no other residence; <u>and</u></li> <li>(iii) Lacks the resources or support networks to obtain other permanent housing</li> </ul>



# Homeless Definition

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

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




# Homeless Definition

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



# Homeless Definition

<b>RECORDKEEPING REQUIREMENTS</b>  	<b>Category 1</b>	Literally Homeless	<ul style="list-style-type: none"> <li>• Written observation by the outreach worker; <u>or</u></li> <li>• Written referral by another housing or service provider; <u>or</u></li> <li>• Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;</li>   <li>• For individuals exiting an institution—one of the forms of evidence above <u>and</u>:               <ul style="list-style-type: none"> <li>○ discharge paperwork <u>or</u> written/oral referral, <u>or</u></li> <li>○ written record of intake worker’s due diligence to obtain above evidence <u>and</u> certification by individual that they exited institution</li> </ul> </li> </ul>
	<b>Category 2</b>	Imminent Risk of Homelessness	<ul style="list-style-type: none"> <li>• A court order resulting from an eviction action notifying the individual or family that they must leave; <u>or</u></li> <li>• For individual and families leaving a hotel or motel—evidence that they lack the financial resources to stay; <u>or</u></li> <li>• A documented and verified oral statement; <u>and</u></li>   <li>• Certification that no subsequent residence has been identified; <u>and</u></li> <li>• Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing</li> </ul>
	<b>Category 3</b>	Homeless under other Federal statutes	<ul style="list-style-type: none"> <li>• 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></li> <li>• Certification of no PH in last 60 days; <u>and</u></li> <li>• 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></li> <li>• Documentation of special needs <u>or</u> 2 or more barriers</li> </ul>
	<b>Category 4</b>	Fleeing/ Attempting to Flee DV	<ul style="list-style-type: none"> <li>• <i>For victim service providers:</i> <ul style="list-style-type: none"> <li>○ 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.</li> </ul> </li> <li>• <i>For non-victim service providers:</i> <ul style="list-style-type: none"> <li>○ 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></li> <li>○ Certification by the individual or head of household that no subsequent residence has been identified; <u>and</u></li> <li>○ Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.</li> </ul> </li> </ul>

## **ATTACHMENT B: OTHER DEFINITIONS**

### **Partner Agency or Agency**

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

### **Precariously Housed and At-Risk of Homelessness**

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

### **Stably Housed**

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

### **Program Participant or Household**

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

### **Family**

Household with at least one adult and one child.

### **HORIZON**

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

### **HUD**

The U.S. Department of Housing and Urban Development

### **CITY**

City of Oklahoma City Planning Department

### **Substandard Housing**

HUD definition:

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



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

**Quarterly Performance Report (QPR)**

Monthly reports are due the 10<sup>th</sup> day of each month for the prior month

## ATTACHMENT C: Homeless Documentation

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

Documentation should include the following:

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