

The City of Oklahoma City's
ANNUAL ACTION PLAN

2026-2027

Approved by the Oklahoma City Council on May 5, 2026
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Executive Summary

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

1. Introduction

The City of Oklahoma City (the City) is a federal Entitlement Community under the U.S. Department of Housing and Urban Development (HUD). As such the City receives four annual grants:

- Community Development Block Grant (CDBG)
- Home Investments Partnership Program (HOME)
- Emergency Solutions Grant (ESG)
- Housing for Persons with AIDs (HOPWA)

As a condition of funding, the City is required to prepare an annual Action Plan each year which summarizes the planned activities to address identified community needs. The Action Plan addresses needs identified in a community analysis called the Consolidated Plan, which must be updated every five years. At the end of each fiscal year, the City must prepare a Consolidated Annual Performance Evaluation Report (CAPER) that provides an assessment of annual performance.

This Consolidated Plan completed in 2025 has identified several complex issues affecting Oklahoma City and its low-income populations. The City's **housing market** remains challenging, with home prices growing rapidly since the pandemic. In addition, Oklahoma City's homes affordable to low-income populations often have serious maintenance needs. Last, the City's housing market faces a shortage of both affordable and higher-income homes, resulting in a market squeeze in middle-income housing. This Action Plan seeks to address housing needs through programs to construct, rehabilitate, and acquire affordable housing for low-income populations.

The City is innovating services to the **homeless** and nearly homeless communities. The Key to Home initiative is a reorganization of the CoC network to educate the community on the issue of homelessness and lead the development and coordination of community strategies to ensure that homelessness is rare, brief, and non-recurring in OKC. Key to Home can accept public funding and private donations and employs a data-driven approach to guide strategies.

Lastly the city will continue to support **community development and neighborhood revitalization** in underserved communities. The Strong Neighborhoods Initiative focuses public and private resources on neighborhoods in the central city that have long faced disinvestment. This program adds housing, infrastructure, and economic opportunities to the selected communities with the goal of tipping the neighborhood from decline into steady growth.

The Plan prioritizes housing as a primary objective, specifically within the Neighborhood Revitalization Strategy Area (NRSA) and the Strong Neighborhoods Initiative (SNI) neighborhoods where 80% of available grant resources are targeted. Each Action Plan Year, funding recommendations are reviewed and vetted according to the goals and objectives of the Consolidated Plan.

2. Summarize the objectives and outcomes identified in the Plan

The 2025-2029 Consolidated Plan contains an assessment of housing and community development needs, as well as those of homeless persons and special populations in Oklahoma City. Objectives and outcomes were established through a review of the data presented in the Needs Assessment and Market Analysis based on HUD's data, input from the public, and consultation with local non-profits and service providers. The City's complete objectives and outcomes can be found in AP-20 Annual Goals and Objectives, and in more detail in AP-35 Projects.

Housing: Multiple data sources indicate that Oklahoma City has many of the same housing needs as cities across the nation: high cost burden and a lack of affordable units. These needs are exacerbated by demographic and market factors. Oklahoma City's population continues to grow at a rate exceeding the national average, the number of renters in the city is growing, and there is a lack of affordable housing for small households, and for the highest and lowest-income populations. In this plan, the City is setting a goal to construct new affordable homes for sale and for rent to low-income residents. In addition, the City will continue to rehabilitate older housing stock for low-income residents.

Homelessness: Homelessness is an increasing need in Oklahoma City. Residents experiencing homelessness are subject to challenges that exacerbate the effects of simply not having housing. The City's Key to Home initiative is prioritizing housing for community members, and then working with them as needed while they stabilize. To be effective in reducing the number of households experiencing homelessness, the City needs more supportive housing units, better access to rapid rehousing, and more affordable housing. In this Plan, the City dedicates its entire ESG budget to homeless services and is developing housing for extremely low-income and formerly homeless residents.

Neighborhood Revitalization: In this Plan, The City continues our approach of concentrating resources strategically within the Strong Neighborhood Initiative (SNI) areas to promote a holistic approach to neighborhood revitalization. This includes housing, economic development, and infrastructure investments targeted to the SNI neighborhoods' needs and desires.

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

3. Evaluation of past performance

The City's 2020-24 Consolidated Plan called for achieving **housing goals** by providing funding and engaging in program activities that included support for housing providers to rehabilitate and construct

new affordable housing. During that five-year plan period, the City constructed or rehabilitated 222 rental units, constructed 30 new single-family homes, and rehabilitated 1,615 owner-occupied homes. Within the last ten years (from 2015-2025) the City has spent over \$114,150,000 on housing and homelessness in the City. This includes local and federal funding. HOME funding in the last ten years has resulted in 608 DPA, single family, and multifamily housing units. CDBG funds were used to rehabilitate over 1,200 homes.

The City's 2025-26 Action Plan was the first Action Plan of the 2025-2029 Consolidated Plan. Homelessness and housing were the city's two priority goals in that Action Plan. The City has worked to fund programs and activities that address multiple goals, as a method to maximize the impact of funding. Housing activities funded include housing for previously unhoused individuals and the development of homes in the Capitol Hill neighborhood. ESG funding goes entirely to homeless service providers.

The Strong Neighborhoods Initiative continued work addressing the goal for neighborhood revitalization in the 2025-26 Action Plan. Activities undertaken by SNI in 2025-26 include the installation of art in public spaces, installation and improvement of sidewalks, hazardous tree removal, and junk and debris clean up. In addition, four homes for sale to low-income buyers began construction in the Capitol Hill neighborhood, under the City's CHDO program. The current SNI neighborhoods are Ross Heights/Pitts Park, Martin Luther King, Jr., and Stockyards City. Some housing construction and projects are expected to continue into this Action Plan year in Capitol Hill and Metro Park, as those neighborhoods graduate from the program and projects are completed. SNI's primary goal is neighborhood revitalization; however, activities in SNI neighborhoods often support and are supported by other goals, such as construction and preservation of affordable housing, economic development, infrastructure improvements, and afterschool programming.

The City continues to innovate programs and is moving towards a more data-driven approach to evaluating and implementing programs. Increased costs have resulted in fewer programmatic accomplishments. During the period of this five-year plan, the City intends to make process improvements and increase efficiency.

4. Summary of citizen participation process and consultation process

The consultation process for this Plan provided several opportunities for residents, service providers, and others to contribute. In November 2025, the City published a Notice of Public Meetings for two community input sessions held in various areas of the City in January 2026. City staff notified the public of the planning meetings through notices on the city's website, news release, an email to residents and service providers on the division's email list, and notification in the Journal Record. Meetings were held in two local libraries, with one meeting during the afternoon to accommodate persons working evening hours. A total of 39 citizens and representatives of local organizations and service providers attended these meetings. 41 comments were received at both meetings.

In addition to public meetings, opportunity for community input was provided during a public meeting of the Citizens Committee for Community Development meeting held on April 21, 2026. A 30-day Notice seeking public comment on the proposed Action Plan and providing notification of a final public hearing at City Council was published in *The Journal Record* on April 3, 2026. Staff accepted written correspondence from the public until 5:00 p.m. on May 5, 2026. A final opportunity for input was provided in a public hearing before the City Council on May 5, 2026. A summary of public comments is attached to this report. Consultation with numerous outside agencies and other municipalities is discussed in Section AP-10. The City of Oklahoma City's Citizen Participation Plan is also attached.

5. Summary of public comments

Citizen input at the various meetings and forums described above touched on many different topics. Key areas of concern or discussion were the following:

- **Affordable Housing:** 20 out of 41 comments focused on the need for affordable housing and what the City is doing to address the housing crisis with federal funds. Citizens offered ideas and solutions to the lack of affordable housing in the City, including tiny homes, ADUs, and adaptive re-use. Citizens emphasized the need for affordable housing to help address homelessness.
- **Homelessness:** 12 out of 41 comments also focused on concerns about rising homelessness in the City. Citizens want to understand what the City is doing to help the homeless and want more resources available to unhoused individuals.
- **Education and Awareness:** 11 out of 41 comments from citizens discussed a lack of awareness about available programs and resources. Many residents had suggestions for community resource events, collaboration, and better outreach. There is a need for training for homebuyers, small-scale developers, and real estate professionals. The City takes this feedback seriously, and the Housing and Community Development Division is working to improve knowledge and training about available programs.

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

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

All comments were received and evaluated. Comments not accepted generally proposed ineligible activities that did not meet the regulatory requirements. Some comments suggested the construction of new homeless shelters, which is an eligible activity. While the City is open to funding new homeless shelters if homeless service providers have a need, the priority for funding is constructing permanent housing to reduce homelessness.

7. Summary

The City will continue to prioritize housing, homelessness, and community revitalization needs in Oklahoma City throughout the 2025-2029 Consolidated Plan.

Citizen involvement and input from local non-profits and service providers has been instrumental in identifying priority needs, strategic objectives, and funded activities for 2026-27 Action Plan. A similar public participation process will be used to inform each of the future Action Plans.

Activities described in this Action Plan may be funded as pre-award costs where required due to delays in HUD funding allocations. This includes CDBG, ESG, and HOPWA activities. All activities are eligible under the grant award and are necessary for efficient and timely performance of the activity. All requirements for pre-award activities will be met prior to any spending.

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

The Process

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

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

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

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

Table 1 – Responsible Agencies

Narrative

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

Consolidated Plan Public Contact Information

For questions and comments regarding this Plan, please contact Ben Davis, Housing & Community Development Manager, The City of Oklahoma City, 420 W. Main Street, Ste. 920, Oklahoma City, OK 73102.

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

1. Introduction

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

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

The City routinely communicates with the Oklahoma City Housing Authority (OCHA) to understand their programs and needs. OCHA generally submits proposals for affordable housing developments when rehabilitating or constructing new public housing projects. The City also works closely with the Housing Authority to coordinate neighborhood engagement in SNI neighborhoods.

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

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

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

In 2020, the City began reorganizing the Continuum of Care Board into the Key to Home Partnership. The Key to Home Partnership, a collaboration of more than 50 organizations, is working together to prevent and end homelessness in Oklahoma City. The City of Oklahoma City serves as the lead agency

for the Key to Home Partnership. The organization's goal is to educate the community on the issue of homelessness and lead the development and coordination of community strategies to ensure that homelessness is rare, brief, and non-recurring in OKC. By driving strategy through collaboration, data-driven decisions, and the voice of those with lived experience, Key to Home can ensure that the response is both appropriate and effective. The City of OKC works directly with HUD to allocate federal funds across the partnership to support programs that provide shelter, housing, and supportive services to people experiencing homelessness in OKC.

Key to Home is a public-private partnership that allows the City to leverage the generosity of private donations to fill gaps that public funds cannot cover. The City believes that it is possible to create and sustain a community where homelessness is rare, brief and non-recurring through strong public/private partnerships, supporting collaboration among stakeholders, using data to guide strategy, and educating the public on homelessness and its solutions.

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

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

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

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

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

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Metropolitan Fair Housing Council
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Fair Housing Enforcement
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Metro Fair Housing provided data on fair housing cases and actions in previous years. Identification of issues related to Fair Housing will inform this Plan and future program activities.
2	Agency/Group/Organization	OKLAHOMA CITY HOUSING AUTHORITY
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Needs - Veterans Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Oklahoma City Housing Authority was consulted directly by City Staff to gauge current needs for public housing and Section 8 tenants. Information was provided by OCHA about current inventories, waiting lists, capital needs, veterans' benefits, anticipated funding over the next five (5) years, and anticipated gaps in resources.
3	Agency/Group/Organization	Association of Central Oklahoma Governments
	Agency/Group/Organization Type	Regional organization Planning organization

	What section of the Plan was addressed by Consultation?	Economic Development Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Oklahoma City continues to partner with the Association of Central Oklahoma Governments (ACOG) in support of economic development activities identified in the regional Comprehensive Economic Development Strategy (CEDS). ACOG serves as the regional Metropolitan Planning Organization (MPO).
4	Agency/Group/Organization	Key to Home Partnership
	Agency/Group/Organization Type	Services - Housing Services-Homeless Services-Health
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Key to Home Partnership was consulted for the homeless housing needs assessment and identification of social services gaps. The City has recently taken on more responsibilities in implementing and maintaining HMIS and is working to coordinate more effectively with CoC subrecipients and other City departments.

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

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

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	The City of Oklahoma City	Homelessness needs and strategies
Housing Affordability Study	The City of Oklahoma City	Housing affordability needs
Housing Affordability Implementation Plan	The City of Oklahoma City	Housing needs and strategies
Community and Economic Development Strategy	Association of Central Oklahoma Governments	Economic development strategies
Hazard Mitigation Plan	The City of Oklahoma City	Disaster and hazard resilience and mitigation
Oklahoma Housing Needs Assessment	Oklahoma Housing Finance Agency	Housing needs and strategies
planokc	The City of Oklahoma City	Housing needs and strategies, climate needs

Table 3 – Other local / regional / federal planning efforts

Narrative (optional):

The City of Oklahoma City maintains an ongoing dialogue with local non-profit and for-profit housing providers and developers to gauge housing needs in the metropolitan area. Solicitations for development proposals are drafted based upon current housing needs and community goals such as mixed income housing, deconcentrating poverty, infill development, and minimal design standards. Housing needs for very low-income families are identified through continuing discourse with the Oklahoma City Housing Authority. As part of the City’s efforts to address affordable housing needs, the City has been actively consulting with area experts on housing, including developers, nonprofit service providers, property managers, and government agencies to improve coordination and collaboration in housing in the city. The goal is for the city to increase production of housing in the areas of the market that most need new units.

Two public meetings were held to discuss the Action Plan. Attendance at these meetings by local service providers and neighborhood associations included representatives from Community Action Agency, City Care, The Homeless Alliance, Positively Paseo, Sisu Youth, Neighborhood Alliance, NE Oklahoma City Renaissance, OKC Metropolitan Area Realtors, Neighborhood Services Organization, and Jefferson Park Neighborhood Association. Comments and input received during these public meetings are provided in the appendices of this report.

Consultations with area service providers and homeless organizations help inform the allocation process for ESG and HOPWA funds. Collaboration and discussion with regional planning organizations and local governments in surrounding counties and communities is pursued to promote regional growth and to

identify opportunities and threats that may require increased attention and/or resources. The City seeks to identify opportunities for stretching resources such as the elimination of duplicative services. Regional approaches to the provision of social services are practiced and encouraged.

AP-12 Citizen 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 Journal Record* on December 22, 2025. In addition, the City sent out notification of the meetings via new release and email to a mailing list. Meetings were held in public libraries in January 2026 at the following locations:

- Capitol Hill Library, 327 SW 27th Street, Oklahoma City, OK 73109 on January 28, 2026, at 6:00 p.m.
- Ralph Ellison Library, 2000 NE 23rd St, Oklahoma City, OK 73111 on January 29, 2026, at 1:00 p.m.

Feedback received at the public meetings was used in conjunction with quantitative data and current demographics to establish goals and projects in this Action Plan. Where possible, strategic goals were identified based on the most urgent community needs. Staff will evaluate needs on an ongoing basis. Funding allocations in each Annual Action Plan will be adjusted as needed to promote a strategic and targeted allocation of resources, with the hope of creating a noticeable and sustainable community benefit.

Citizen Participation Outreach

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)
	Newspaper Ad	Non-Targeted/broad community	The two public input sessions and a request for comments were noticed with an ad in The Journal Record on December 22, 2025.	No written comments were received in response to the notice.	Not applicable	
	Public Meeting	Non-targeted/broad community	The meetings were attended by 39 residents and service providers. A total of 41 comments were generated at both meetings.	All public comments are included in the Appendix. Comments primarily focused on affordable housing, homelessness, and communication.	Comments not accepted generally proposed ineligible activities.	NA
	Newspaper Ad	Non-targeted/broad community	A thirty (30) day comment period Notice of Public Hearing and Notice of Public Comment	No additional comments were received in response to the published request	Not Applicable	NA

			Period was printed in <i>The Journal Record</i> on April 3, 2025.	for public comment about proposed activities.		
	Public Meeting	Non-targeted/broad community	A public meeting was held at the Citizen's Committee for Community Development on April 21, 2026.	CCCD members provided feedback...	All comments were included in the Action Plan.	
	Public Hearing	Non-targeted/broad community	Public hearing before City Council May 5, 2025.	No additional public comment was received during the public hearing before City Council.	All comments were included in the Action Plan.	NA

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City of Oklahoma City expects allocations for four entitlement programs over the next five years: CDBG, HOME, ESG, HOPWA. Allocations in this Action Plan estimate level funding for all four entitlement grants. Supplemental HOME-ARP funding provided in response to the COVID-19 pandemic will be carried forward. Resources allocated in this Plan are funded solely through regular formula grant funding allocations. Section 108 Loan Guarantee applications may be submitted to further the City's ongoing economic development initiatives if additional opportunities materialize during the term of this Action Plan.

The City approved a General Obligation Bond (GO) election in 2025, a portion of which included a \$50 million allocation for affordable housing. These local funds will complement HOME and CDBG funding currently used for the development of affordable housing in Oklahoma City.

Annual allocations, funds carried forward from prior program years, and program income estimates are based on the most recent data available at the time of report submission and are subject to change.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	5,130,024	0	6,471,769.07	11,601,793.07	14,933,474.27	Prior year resources include 2024-2025 funds obligated/under contract and distribution of funds reallocated and recaptured. Future allocations assume a 1% decrease in CDBG funding over the life of the Plan.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily	2,319,980.93	0	9,655,182.46	11,975,163.39	6,753,452.91	Prior year resources include 2024-2025 funds obligated/under contract and distribution of funds reallocated and recaptured. Future allocations assume a 1% decrease in HOME

		rental rehab New construction for ownership TBRA						funding over the life of the Plan.
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	1,419,527	0	0	1,419,527	4,519,830.98	Future allocations assume a 2% increase in HOPWA funding over the life of the Plan.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re- housing (rental assistance)	444,290	0	0	444,290	1,293,325.97	Future allocations assume a 1% decrease in ESG funding over the life of the Plan.

		Rental Assistance Services Transitional housing						
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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 needs in the community. In general, most programs operated under this plan require some type of match or leverage. Affordable housing developments are rarely funded more than the gap funding required.

For required HOME match contributions, Presidential Disaster Declarations and HUD match reduction for severe fiscal distress eliminated the need to provide 25% match funding for the HOME program in many recent program years. Due to these waivers, the City accumulated a significant banked match credit which will ensure that adequate leverage is available for new activities. However, The City of Oklahoma City continues to prioritize funding of projects that leverage private capital and non-federal funding. It is anticipated that GO Bond funding for affordable housing will provide local match to HOME and CDBG funded affordable housing initiatives.

The City provides HOME funds to Community Housing Development Organizations (CHDOs) for new home construction and rehabilitation/sale activities. CHDOs are encouraged to utilize private bank financing along with CHDO HOME funds (some provided as grants and some as loans) in providing affordable housing. When possible, the City facilitates the transfer at no cost of Oklahoma County-owned vacant lots to nonprofit organizations for the construction of affordable housing. The lots are provided to the City through an agreement with Oklahoma County. The City also facilitates CHDO developments on Oklahoma City Urban Renewal Authority property at little or no cost in SNI neighborhoods. The CHDOs are bringing private financing for the projects, as well as covering certain hard and soft costs with other non-federal funds.

The City's down payment and closing cost assistance program supports the achievement of home ownership and has proven to be an attractive program that stimulates significant interest among private lenders. The City will continue to leverage its Down Payment Assistance program funds with private financial institution mortgage investments.

The City also provides local funding (general funds) to agencies that provide services to the homeless. Match for ESG programs is also required to be generated by the service providers who utilize these funds.

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

The Oklahoma City Urban Renewal Authority (OCURA) still owns significant amounts of property in the northeast area of the city and seeks to develop many of its sites with mixed-income housing projects. Additionally, OCURA owns numerous single infill lots and has an open solicitation for individuals or organizations to develop housing. Those lots are offered at a minimal sale price. Beyond

this, OCURA will continue the redevelopment of closeout areas under the agreements with HUD through eligible program activities that include acquisition, disposition, relocation, clearance, brownfield remediation, and urban renewal completion. HUD-designated Urban Renewal areas include Medical Center R-20, Central Business District 1A R-30, and John F. Kennedy R-35. In addition, OCURA will redevelop locally designated low- and moderate-income urban renewal areas, Harrison Walnut and NE Renaissance.

For this Action Plan year, the City intends to leverage this land to develop housing in two SNI neighborhoods, Ross Heights/Pitts Park and MLK. These neighborhoods have a significant number of vacant OCURA lots that provide a great opportunity for the development of affordable for-sale homes. In addition, these neighborhoods contain commercial parcels owned by OCURA that are currently under development, including the Clara Luper Civil Rights Center, and a property at NE 23rd Street and MLK, which is involved in concept development. These developments will help address the neighborhood revitalization and affordable housing needs identified in this plan.

The City owns 105 residential lots on the north side of Northwest 10th Street between Ellison Avenue to the east, and Virginia Avenue to the west. This property continues to be an opportunity for the development of housing. Major challenges to any development include a lack of necessary infrastructure serving the lots. The City is working to develop a new RFP for the properties which will be released during the 5-year Plan period.

Discussion

Land costs continue to increase within the NRSA and SNI areas, hindering the development of small-scale affordable housing. Leveraging existing land, especially in new and former SNI neighborhoods for the development of affordable housing is a high priority under this strategic plan. Staff continue to explore new and innovative mechanisms for acquiring affordable and developable land, with an emphasis on SNI neighborhoods.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase Affordable Housing Opportunities	2025	2029	Affordable Housing	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Creation and Retention of Affordable Housing	HOME: \$8,956,791.84	Rental units constructed: 10 Household Housing Unit Homeowner Housing Added: 27 Household Housing Unit
2	Retain Affordable Housing Stock	2025	2029	Affordable Housing	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Creation and Retention of Affordable Housing	CDBG: \$2,625,000.00 HOME: \$850,000.00	Homeowner Housing Rehabilitated: 75 Household Housing Unit
3	Invest in Underserved Neighborhoods & Communities	2025	2029	Non-Housing Community Development	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Neighborhood Revitalization	CDBG: \$2,835,560.00	Public Facility or Infrastructure Activities other than Low/Moderate Income

								Housing Benefit: 4500 Persons Assisted Public service activities other than Low/Moderate Income Housing Benefit: 850 Persons Assisted Homeowner Housing Added: 12 Household Housing Units
4	Support Public Services	2025	2029	Non-Homeless Special Needs Non-Housing Community Development		Support Public Services	CDBG: \$151,000.00	Public service activities for Low/Moderate Income Housing Benefit: 50,899 Households Assisted

5	Increase Economic Opportunity	2025	2029	Non-Housing Community Development		Economic Opportunity	CDBG: \$440,000.00	Businesses assisted: 65 Businesses Assisted
6	Decrease and Prevent Homelessness	2025	2029	Homeless		Creation and Retention of Affordable Housing Decrease and Prevent Homelessness Support Public Services	ESG: \$444,290.00	Tenant-based rental assistance / Rapid Rehousing: 400 Households Assisted Homeless Person Overnight Shelter: 3400 Persons Assisted Homelessness Prevention: 190 Persons Assisted
7	Support for Populations Living with HIV/AIDs	2025	2029	Non-Homeless Special Needs			HOPWA: \$1,419,527.00	Public service activities other than Low/Moderate Income Housing Benefit: 234

								Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 53 Households Assisted Homelessness Prevention: 50 Persons Assisted
8	Elimination of Slum and Blight	2020	2024	Non-Housing Community Development	NEIGHBORHOOD STRATEGY AREA	Elimination of Slum and Blight	CDBG: \$1,038,880.00	Other: 120Other
9	Administration, Planning, and Fair Housing	2020	2024	Program Administration		Administration and Fair Housing Activities	CDBG: \$1,026,005 HOME: \$248,348.09	

Table 6 – Goals Summary

Goal Descriptions

	Goal Name	Increase Affordable Housing Opportunities
1	Goal Description	Activities under this goal fall into one of three major programs: the Affordable Housing Development Program (AHDP), the Community Housing Development Organization Program (CHDO), and the Downpayment Assistance Program (DPA). Activities that result in the creation of affordable housing in Oklahoma City will be funded under this goal throughout the

		<p>Action Plan Year. This includes, but is not limited to rental housing development, the development of for-sale housing, and downpayment assistance.</p> <p>A Request for Proposals (RFP) was issued for new affordable housing in February 2026 under the HOME Affordable Housing Development Program. These activities are funded primarily with HOME funds and may be supported with CDBG funding. It is anticipated that another RFP for Affordable Housing Development will be issued in January or February of 2027. The AHDP primarily serves the needs identified in the Housing Affordability Implementation Plan and housing in SNI areas and the NRSA.</p> <p>The CHDO program focuses on the construction of new homes for sale to low-income buyers, with an emphasis on SNI neighborhoods and the NRSA. These homes are developed by Community Housing Development Organizations (CHDOs). The Downpayment Assistance Program assists low-income households purchase a home sustainably.</p>
2	Goal Name	Retain Affordable Housing Stock
	Goal Description	<p>Activities under this goal receive CDBG and HOME funding to support housing rehabilitation, including whole house rehabilitation, exterior maintenance, and emergency repairs for low-moderate income homeowners or renters. The City currently offers a Housing Exterior Maintenance Program, an Emergency Home Repair Program, and Whole House Rehab Program. These are expected to continue in the current Action Plan Year. Rehabilitation activities for low-income households will be funded under this goal, not limited to the current programs and program design.</p> <p>Early development of a rental rehabilitation program will occur in this Action Plan Year, to meet the needs identified in the Needs Assessment and Housing Affordability Implementation Plan. No outcomes are expected in this Action Plan Year. Priority and expanded services are offered to homes within SNI neighborhoods.</p>
3	Goal Name	Invest in Underserved Neighborhoods & Communities
	Goal Description	<p>CDBG funding under this goal is intended to revitalize underserved and historically disinvested neighborhoods and communities. This urban revitalization goal seeks to provide just enough public funding to tip communities from declining into growth. Stable, thriving neighborhoods create opportunities for residents, and benefit the city in complex and connected ways, from reducing crime to increasing economic opportunity and improving tax revenues. Most funding under this goal is targeted to the SNI neighborhoods. SNI activities under this goal are divided into two broad categories: SNI Public Facilities and SNI Public Services. SNI Public Facilities includes activities and programs such as neighborhood grants, public art, street improvements, sidewalks, parks, tree plantings, and facade improvements. SNI Public Services</p>

		<p>include activities such as after school programs, neighborhood clean-ups, and hazardous tree removal. Most SNI activities benefit the entire neighborhood, and the estimated outcomes are based on the populations of the census tracts in the neighborhood. Activities under the "other" GOI include SNI Neighborhood Clean Up Safe and Tidy.</p> <p>The city also supports non-SNI public facilities projects under this goal when they meet a need or goal in the Consolidated Plan, such as urban revitalization or serving underserved communities. These public facilities projects are referred to as General Public Facilities and benefit the entire area in which the project occurs. This goal may also include a public facility or infrastructure investment that results in the creation of additional housing, such as Walnut Infrastructure Development.</p>
4	Goal Name	Support Public Services
	Goal Description	CDBG funds are allocated to eligible public service activities that meet the needs identified in the Consolidated Plan, and which serve disadvantaged populations. Regularly funded activities include advocacy programs for foster youth (CASA) and transportation and courier services for special populations (COTPA). Activities under this goal are subject to a 15% public services cap. The city is considering adding a program to provide capacity building public service grants to eligible nonprofits under this goal. These funds would help expand program partners and services available to disadvantaged populations in Oklahoma City.
5	Goal Name	Increase Economic Opportunity
	Goal Description	CDBG funds are allocated to support small businesses and job creating projects for low-income populations. Funded activities include the CAA small business training program. A Section 108 loan contingency (\$100,000) has been allocated to protect the CDBG investment in the event of a loan default.
6	Goal Name	Decrease and Prevent Homelessness
	Goal Description	ESG funding is allocated to assist the homeless population. Activities supported include ESG Rapid Rehousing, Emergency Shelter and Street Outreach, Emergency Shelter (New Beds), and Homeless Prevention. Projected beneficiaries are estimated based on previous year's outcomes.
7	Goal Name	Support for Populations Living with HIV/AIDs
	Goal Description	This goal provides support with HOPWA funding for individuals living with HIV/AIDs. The State of Oklahoma has seen increases to the number of individuals living with HIV/AIDs. Activities under this goal include HOPWA Tenant Based Rental Assistance, Short Term Rent, Mortgage, and Utility Assistance, Permanent Housing Placement, Housing

		Information Services, and Supportive Services. Estimates of beneficiaries served are based on prior year accomplishments.
8	Goal Name	Elimination of Slum and Blight
	Goal Description	<ul style="list-style-type: none"> This goal meets the need identified in the plan of eliminating slum and blight. These investments arrest further deterioration in challenged neighborhoods or on a spot basis. CDBG funding is allocated to the Oklahoma City Urban Renewal Authority to assist in URA completions, environmental remediation, acquisition, infrastructure development and other eligible activities to assist in disposition of urban renewal properties. CDBG funds are also used to secure vacant and abandoned housing under the City's Vacant and Abandoned Buildings Program.
9	Goal Name	Administration, Planning, and Fair Housing
	Goal Description	Funding for administration is necessary to facilitate ongoing management and administration of formula grant programs. Administrative funds are used for staff support and program operations to ensure that CDBG, HOME, ESG, and HOPWA funds are allocated, tracked, disbursed and monitored in compliance with federal regulations. CDBG administrative funds are also used to support Fair Housing activities through Metro Fair Housing Council, which receives an annual allocation of \$93,000. Outcomes are not tracked for administrative activities.

Projects

AP-35 Projects – 91.220(d)

Introduction

The following projects and activities for the Action Plan are consistent with the needs and goals established in the new Five-Year Consolidated Plan and include:

- Affordable Housing Programs consisting of housing rehabilitation, down payment assistance, and new construction that focus on adding and improving housing opportunities for lower-income persons.
- Neighborhood revitalization programs include the Strong Neighborhoods Initiative’s public facility and public services investments in underserved neighborhoods, OCURA’s activities addressing slum and blight, and public facilities to improve underserved communities.
- Support for the homeless and those living with HIV/AIDS through the Emergency Solutions Grant and HOPWA.
- Economic Development activities targeting the low and moderate-income areas, and the Neighborhood Revitalization Strategy Area, including potential application(s) for Section 108 funds.
- Public services to assist special needs populations and persons with disabilities, including, but not limited to the elderly, senior citizens, chronically homeless individuals and families, sight-impaired persons, persons in drug and alcohol recovery, and persons diagnosed with permanent physical and mental disabilities.

The goals in this Action Plan specifically relate to the goals outlined in the 2025-2029 Consolidated Plan and include:

- Increasing Affordable Housing Opportunities
- Retaining Affordable Housing Stock
- Investing in Underserved Neighborhoods and Communities
- Supporting Public Services for Disadvantaged Populations
- Increasing Economic Opportunity
- Decreasing and Preventing Homelessness
- Support for Populations Living with HIV/AIDS
- Elimination of Slum and Blight
- Administration, Planning, and Fair Housing

Oklahoma City’s formula grant funding allocations, as recommended for adoption in this Action Plan (fiscal year July 1, 2026, through June 30, 2027), follow the priorities established in the five-year Consolidated Plan that expires June 30, 2030. The Action Plan strategy contains specific funding

recommendations to implement the goals established in the five-year Plan to the greatest extent possible, depending on federal funding allocations awarded to The City of Oklahoma City.

The City intends to expend carry-forward balances (when applicable) from this Action Plan past the June 30th program year expiration. Funds carried forward may include obligated year-end balances that have not yet been expended; and/or unobligated funds available for reallocation. This action will ensure continued operations of regularly funded programs and activities during the transition between program years. Expenditure of funds carried forward may occur before HUD approval of the future Action Plan.

Activities described in this Action Plan may be funded as pre-award costs where required due to delays in HUD funding allocations. This includes CDBG, ESG, and HOPWA activities. All activities are eligible under the grant award and are necessary for efficient and timely performance of the activity. All requirements for pre-award activities will be met prior to any spending.

When HUD allocations are released on time, prior to the submission date of the Action Plan, the program year start date for the City is July 1. No activities will be funded that begin prior to this date.

Projects

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

Table 7 – Project Information

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

The City continues to prioritize affordable housing and homelessness prevention and reduction activities. Affordable housing is a high priority need in the City. The City is working on multiple fronts to improve access to affordable housing for its residents. To that end, CDBG funds are primarily being used for housing rehabilitation programs for low-income residents, and HOME funds are dedicated to the

construction of new affordable housing and downpayment assistance. In addition, the City has a renewed focus on housing projects in SNI neighborhoods from other programs.

SNI's neighborhood revitalization activities meet many identified community needs. These programs fund public facilities and services in historically underserved and disinvested communities. The SNI program provides holistic support to these communities, often serving as an initial catalyst for further investment and comprehensive neighborhood change. These programs support housing, economic development, prevention of homelessness, and neighborhood revitalization goals and needs identified in the 2025-2029 Consolidated Plan.

The city continues to seek ways to support small-scale affordable rental properties. Rental housing challenges with affordability and condition were identified in the HAS, HAIP, and the 2025-2029 Consolidated Plan. This Action Plan may provide funding for programs to support rentals apart from new construction. The Housing and Community Development Division is pursuing new and creative program designs to serve low-income renters. Administrative funds have been committed for Fair Housing Enforcement to respond to ongoing concerns about tenants' rights and evictions.

AP-38 Project Summary

Project Summary Information

1	Project Name	Affordable Housing Development Program
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Increase Affordable Housing Opportunities
	Needs Addressed	Creation and Retention of Affordable Housing
	Funding	CDBG: \$1,430,018.10 HOME: \$9,653,381.25
	Description	<p>This project funds the development of new affordable housing under the Affordable Housing Development Program (AHDP) and the Community Housing Development Organization (CHDO) Program.</p> <p>The City selects these projects for the AHDP using an RFP typically released annually in the winter. The AHDP primarily serves the needs identified in the Housing Affordability Implementation Plan and focuses on affordable housing in SNI areas and the NRSA. Projects will be for housing for low-income populations and may include CDBG funds. Projects funded will include both rental and homeownership housing. Identified projects include Vita Nova (\$1,200,000) and Alley's End (\$600,000). Additional projects will be added to this project as funded by an RFP issued in March of 2026.</p> <p>The CHDO program focuses on the construction of new homes, generally for sale to low-income buyers, with an emphasis on SNI neighborhoods. Activities selected by the AHDP RFP that will be carried out by a CHDO will be undertaken under the CHDO program.</p> <p>Other housing development activities may be funded under this project if they serve low-income populations and result in additional access to affordable housing in Oklahoma City.</p>
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	<p>The AHDP Program is expected to generate 10 units for low and very low-income families this year.</p> <p>The CHDO Program is expected to generate 7 housing units for low-income families this year.</p>

	Location Description	Activities are focused on SNI areas and the NRSA. However, projects outside of the NRSA may be funded.
	Planned Activities	New construction of affordable housing for rent and ownership, limited to low-income households.
2	Project Name	Affordable Housing Rehabilitation and Retention
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Retain Affordable Housing Stock
	Needs Addressed	Creation and Retention of Affordable Housing Decrease and Prevent Homelessness
	Funding	CDBG: \$3,595,020.38 HOME: \$643,441.00
	Description	<p>This project funds programs and activities that rehabilitate housing for low-income populations.</p> <p>HOME funding is provided for the Whole House Rehabilitation Program to rehab an estimated two homes for low to moderate income households.</p> <p>CDBG funds support multiple housing retention programs:</p> <ul style="list-style-type: none"> • The Emergency Home Repair program (EHR) provides repairs to critical home systems, including roofs, HVAC, electrical and plumbing. The goal of the program is to repair damaged systems for low-income homeowners quickly, to avoid additional damage or danger to residents. Approximately 38 homeowners will be assisted with emergency repairs. • The Housing Exterior Maintenance Program (HEMP) will serve 35 homeowners. • The Housing Rehabilitation Program receives CDBG funding for program delivery associated with inspections, application processing, and other program delivery activities associated with Housing Rehabilitation activities. • The Rental Rehabilitation Program is a new program. This program will fund the rehabilitation of low-income rental housing. <p>Other activities may be funded under this project, if they serve low-income populations and are eligible rehabilitation activities. Program operators are subject to change based on performance and city procurement processes.</p>

	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	An estimated thirty-five homeowners will receive exterior maintenance repairs, two homeowners will receive whole-house rehabilitations, thirty-eight homeowners will receive emergency repairs. No rental rehabilitations are estimated to be completed in the first year of the program, but the program anticipates beginning construction on up to eight properties.
	Location Description	City wide, with emphasis in the NRSA and SNI Areas.
	Planned Activities	Exterior maintenance repairs, emergency home repairs, whole-house rehabilitation, acquisition and rehabilitation.
3	Project Name	Down Payment Assistance Program
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Increase Affordable Housing Opportunities
	Needs Addressed	Creation and Retention of Affordable Housing
	Funding	HOME: \$1,146,044.04
	Description	HOME funds will be used to assist low- income homebuyers to purchase homes. Assisted homebuyers must occupy homes as their primary residence.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 20 low-income homebuyers will be provided with downpayment and closing cost assistance during the program year.
	Location Description	Funding is restricted to the Program boundaries with priority given to SNI and NRSA neighborhoods.
	Planned Activities	Down payment, closing cost, and Interest rate buydown assistance to low-income homebuyers.
4	Project Name	SNI Public Facilities Activities
	Target Area	Strong Neighborhoods Initiative
	Goals Supported	Invest in Underserved Neighborhoods & Communities
	Needs Addressed	Neighborhood Revitalization
	Funding	CDBG: \$1,454,158.52
	Description	Funds are allocated for SNI public facilities projects. These funds will support: <ul style="list-style-type: none"> • Neighborhood Grant projects, which often include public art, street improvements, and other neighborhood-led improvements • Tree planting

		<ul style="list-style-type: none"> • Program Delivery • Sidewalks in all current SNI neighborhoods <p>Other neighborhood projects may be funded from this allocation as identified, if they improve public facilities in an SNI neighborhood.</p>
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Improvements under this project will provide community-wide benefit to approximately 4,500 households. The population of each SNI neighborhood is estimated to be 1,500, and there are three neighborhoods. Each SNI neighborhood has more than 51% low- to moderate-income households.
	Location Description	Activities are limited to designated Strong Neighborhoods Initiative neighborhoods - Metro Park, Capitol Hill, Ross Heights/Pitts Park, Stockyards, and MLK Jr. Capitol Hill and Metro Park are graduating this fiscal year, and projects in these areas will wind down, but may still occur.
	Planned Activities	Sidewalk installation, park improvements, tree planting, other eligible community improvements as identified.
5	Project Name	SNI Public Services Activities
	Target Area	Strong Neighborhoods Initiative
	Goals Supported	Invest in Underserved Neighborhoods & Communities
	Needs Addressed	Neighborhood Revitalization
	Funding	CDBG: \$662,937.16
	Description	<p>CDBG funds are provided to support public service activities in our SNI neighborhoods. This program provides:</p> <ul style="list-style-type: none"> • After School Programs • Neighborhood Cleanup Safe and Tidy • Hazardous Tree Removal • Hazardous Tree Assessments <p>Other neighborhood projects may be funded from this allocation as identified, if they provide a public service to SNI neighborhoods. These activities are subject to the 15% cap on public services for CDBG activities.</p>
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 850 students will be served through the After School Program. Hazardous tree removals and neighborhood clean-ups benefit the community and are each reported as an area-wide benefit serving approximately 4,500 people.

	Location Description	Designated Strong Neighborhoods Initiative neighborhoods (Stockyards, Ross Heights/Pitts Park, MLK, Capitol Hill, and Metro Park).
	Planned Activities	After school programming, neighborhood cleanup, and hazardous tree removals.
6	Project Name	Community Development - Public Facilities Activities
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Invest in Underserved Neighborhoods & Communities
	Needs Addressed	Neighborhood Revitalization
	Funding	CDBG: \$233,841.15
	Description	This project consists of CDBG funds allocated for the support of various eligible public facilities and improvements activities. Activities funded by this project may consist of public facilities projects that provide a benefit to low and moderate income areas, clientele, or households. Generally, these activities will include, but are not limited to, public facilities rehabilitation, infrastructure improvements, and nonprofit facility rehabilitation. Current funded projects include the Garden Oaks Community Center and Walnut Development Infrastructure.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	The City estimates no households will benefit from public facilities projects this fiscal year.
	Location Description	City wide, with emphasis in the NRSA and SNI Areas.
	Planned Activities	Infrastructure development, neighborhood centers, and other eligible public facilities activities.
7	Project Name	Community Development - Public Services Activities
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Support Public Services
	Needs Addressed	Decrease and Prevent Homelessness Support Public Services
	Funding	CDBG: \$319,149.49
	Description	This project consists of CDBG funds allocated for eligible public service activities that benefit low- and moderate income households. CDBG funds are allocated to COTPA to provide discounted bus and taxi fares, and courier services to special populations. Funds are provided to CASA for child advocacy services within the foster care system.

		Other public service activities may be funded from this allocation as identified, if they provide a public service to low-income residents. These activities are subject to the 15% cap on public services for CDBG activities.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 70 foster youth will be provided with advocacy resources. Approximately 50,829 discounted bus and taxi coupons will be provided to special populations (<i>Note: these represent vouchers provided, not persons served. Duplication can be expected</i>).
	Location Description	City-Wide
	Planned Activities	Foster Care Advocacy, transportation and courier services to special populations, and other eligible public service activities.
8	Project Name	Economic Development
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Increase Economic Opportunity
	Needs Addressed	Economic Opportunity
	Funding	CDBG: \$167,731.04
	Description	This project uses CDBG funding for eligible economic development activities, resulting in economic benefits to low- and moderate-income households. CDBG funds are allocated to support economic development programs, including but not limited to small business services. \$40,000 is allocated to Community Action Agency to fund a small business training program. \$100,000 is allocated to provide a Section 108 loan contingency to ensure timely repayments to HUD. Funds may be used for economic development activities, including façade improvements in low-income areas.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 65 small businesses will receive training and technical assistance. It is not expected that any jobs will be created in this Action Plan year from Section 108 loan activities.
	Location Description	City-Wide, with emphasis on SNI areas and the NRSA.
	Planned Activities	Small business training, job creation, and economic development activities.
9	Project Name	Slum and Blight Remediation
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Elimination of Slum and Blight
	Needs Addressed	Elimination of Slum and Blight

	Funding	CDBG: \$2,039,889.50
	Description	CDBG funds have been allocated to the Oklahoma City Urban Renewal Authority (OCURA) to assist with urban renewal completions, property maintenance and disposition. Funding is also allocated to the City's Abandoned Buildings Program to secure vacant and abandoned properties.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	The number of program beneficiaries under the OCURA allocation is contingent on the type, size and scale of projects funded. The Abandoned Building Program is expected to secure approximately 120 properties.
	Location Description	Urban Renewal Project Areas, spot blight locations
	Planned Activities	Securing vacant and abandoned properties, acquisition, disposition, clearance, relocation, and Urban Renewal completion activities.
10	Project Name	Homeless Programs
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Decrease and Prevent Homelessness
	Needs Addressed	Decrease and Prevent Homelessness
	Funding	ESG: \$444,290.00
	Description	ESG funds are used to provide services, emergency and transitional housing, and case management resources for the prevention of homelessness. Funded activities include, but are not limited to rapid rehousing, homelessness prevention, and emergency shelter.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 3,990 individuals will receive various services targeted to the homeless or at risk of becoming homeless.
	Location Description	City-Wide
	Planned Activities	Rapid rehousing, services to the homeless, emergency shelter, homelessness prevention activities.
11	Project Name	HOPWA Programs
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Support for Populations Living with HIV/AIDs
	Needs Addressed	Support those Living with HIV/AIDs
	Funding	HOPWA: \$1,419,527.00
	Description	Activities under this project include HOPWA Tenant Based Rental Assistance, Short Term Rent, Mortgage, and Utility Assistance,

		Permanent Housing Placement, Housing Information Services, and Supportive Services. Estimates of beneficiaries served are based on prior year accomplishments.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 337 households will receive various services.
	Location Description	City-Wide
	Planned Activities	Tenant Based Rental Assistance, Short Term Rent, Mortgage, and Utility Assistance, Permanent Housing Placement, Housing Information Services, and Supportive Services
11	Project Name	Administration, Planning, and Fair Housing
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Administration and Planning
	Needs Addressed	Administration and Fair Housing Activities
	Funding	CDBG: \$699,047.73 HOME: \$532,297.10
	Description	HOME and CDBG funds are allocated for the management and administration of federal programs. CDBG administration funds in the amount of \$45,000 are allocated to support planning activities. An allocation of \$93,000 is for Fair Housing investigations.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 400 persons will be provided with investigative Fair Housing support through the Metro Alliance with CDBG administration funding.
	Location Description	City-wide
	Planned Activities	CDBG and HOME program administration, CDBG planning support, and Fair Housing program activities.

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 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. 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 City concentrates a minimum of 80% of CDBG and HOME funds in the NRSA.

Within the NRSA, the City’s SNI program has designated three neighborhoods as target areas for funding: Ross Heights/Pitts Park, MLK, and Stockyards. These three neighborhoods will receive concentrated investments and priority for programs such as housing rehabilitation. All three neighborhoods have significant challenges and are areas of low-income concentration and historical disinvestment. The City aims to concentrate most funds in the SNI neighborhoods, to achieve comprehensive and targeted neighborhood revitalization.

The City of Oklahoma City is the largest city in the State of Oklahoma in both population and land area. The community is racially diverse with a total minority population exceeding 38.6%. 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. Low-income areas of the city are primarily central.

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

Geographic Distribution

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

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

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City targets resources strategically to support neighborhood revitalization efforts in the areas with the greatest community needs. The NRSA was chosen because it surrounds the center of the city and contains a large segment of the lower-income population who need residential assistance and homes

that may have lead-based paint. The NRSA received its designation in part based on documented need, its geographic location encompassing much of the central city, and its concentration of lower-income residents. As a result, the City of Oklahoma City will continue to focus on the NRSA as the area where most federal funds will be expended to benefit the largest numbers of lower-income residents and areas of greatest need within the community.

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

Discussion

The City of Oklahoma City strives to invest 80% of federal CDBG and HOME dollars within the NRSA, with an additional 20% allocated to projects and activities outside the NRSA boundaries. The SNI neighborhoods lie within the NRSA and are strategically targeted for reinvestment. Resources are allocated to SNI neighborhoods to the greatest extent possible. The City's SNI program has designated three neighborhoods as target areas for funding: Ross Heights/Pitts Park, MLK, and Stockyards.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City is prioritizing affordable housing in this Action Plan year, and throughout the five-year Consolidated Plan. This aligns the Consolidated Plan and Action Plan with the Housing Affordability Study (2021) and Housing Affordability Implementation Plan (2025), which outline actions and needs for housing in Oklahoma City. The following tables outline the goals for households supported with federal funding, separated by type of household. The estimates in the following table do not include emergency shelter, transitional shelter, or supportive services, but focus on permanent housing.

Current programs to assist households to maintain affordable housing through rehabilitation and repair include the Emergency Home Repair, Housing Exterior Maintenance, and Whole House Rehabilitation Programs. Programs to construct new affordable housing are the Affordable Housing Development Program (AHDP) and the Community Housing Development Organization Program (CHDO). Both programs support the development of quality affordable housing for rent or sale to low-income households. In addition, the city funds downpayment assistance for low-income households to purchase a home through the Down Payment Assistance Program. Finally, the HOPWA program provides Tenant Based Rental Assistance to households.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	165
Special-Needs	0
Total	165

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

One-Year Goals for the Number of Households Supported Through	
Rental Assistance (TBRA/STRMU)	55
The Production of New Units	17
Rehab of Existing Units	75
Acquisition of Existing Units	20
Other	0
Total	165

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

Discussion

The City generally provides housing to non-homeless populations, as housing for the homeless presents many challenges. However, the City currently has one project in development with OCHA, Vita Nova,

which would provide permanent supportive housing to formerly homeless households. This project is expected to be completed in the summer of 2027.

AP-60 Public Housing – 91.220(h)

Introduction

The Oklahoma City Housing Authority owns 2,716 public housing units in projects and scattered rental units. The units are divided among senior and general occupancy units. Section 8 Vouchers are provided to 4,216 families, of which 181 are project-based and 4,035 are tenant-based. OCHA's public housing units range in age from 31 to 100+ years old and typically have a vacancy rate of 3-9%. All residents are low income, and most residents have incomes below 30% AMI.

OCHA administers a total of 7,717 housing units. The tenant share of rent is based on household income, and a subsidized tenant may make a choice to pay more of their own money to have a more expensive rental unit. OCHA is working to convert many units to RAD conversions, remove some old, scattered site properties from their portfolio, and develop new high-quality mixed income housing.

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. All housing is considered "average" by the Housing Authority. The City currently has \$1.2 million in HOME funds set aside for one OCHA project, Vita Nova. Construction is intended to begin in this action plan year. Vita Nova would create 75 new units for formerly homeless individuals.

OCHA applied in conjunction with the City for a Choice Neighborhoods Initiative (CNI) Implementation grant for Will Rogers Courts, a public housing complex adjacent to Stockyards City in Oklahoma City. The City has worked closely with OCHA on the development of the plan for CNI in Will Rogers Courts. The City intends to provide both CDBG and HOME funding to the project, as well as local GOLT funding.

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

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

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

Not applicable. OCHA is designated as a standard performer.

Discussion

The Oklahoma City Housing Authority (OCHA) administers the City's public housing rental projects and administers the Section 8 rental assistance voucher program. OCHA is an active partner in the affordable housing landscape in Oklahoma City. Many OCHA properties are aging, and OCHA is in the process of building new units and decommissioning old units. The City sees OCHA as an essential partner in providing housing for very low-income residents across the City. Residents earning less than 30% AMI in Oklahoma City need more units affordable to them, and this demographic is rarely served by unsubsidized housing. As OCHA redevelops older units and consolidates scattered site units, their capacity as a developer of rental housing for low and very low-income populations is essential for success in implementing the City's affordable housing strategy. In addition, vouchers administered by the Housing Authority are necessary in Key to Home's ability to move residents from homelessness to housing.

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

Introduction

The City manages a community-wide effort to prevent and end homelessness within the Continuum of Care by building inter-agency partnerships and coordinating services. These partnerships work together to provide members of the community with the necessary tools to remain in their homes or to obtain appropriate affordable permanent housing. All community partners work to provide a streamlined process of screening, assessment, referral, service coordination, direct assistance and follow up to individuals and families in need of safe, affordable, and stable housing. The City is also refining standards for case management that will become part of the annual trainings provided by CoC lead staff. This along with performance tracking should help ensure all clients receive the same, high-quality level of service regardless of what program they access.

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

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

To reach unsheltered homeless individuals and families, ESG funds are used for outreach activities to connect this population with emergency shelter, housing, and/or services. Assistance is sometimes extended to non-facility based medical/mental health care if recipients of that care are unable or unwilling to access an appropriate health facility.

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

In addition to the entitlement funds, the City has engaged a new Key to Home Program. The Oklahoma Key to Home Partnership was subsequently created as a collaborative team of service providers, local government, community leaders and funders with a mission to prevent and end homelessness. As one component, the Key to Home Partnership launched an encampment-rehousing program. This is an intentional, structured effort to offer individuals in established encampments safe and dignified housing solutions prior to closing an area or reactivating it for general use. The initiative exceeded its first two-year goal of rehousing 500 individuals by the end of 2025. Over the first two years of the initiative, 30 encampments were decommissioned, 513 people were transitioned to housing with supportive services, and 93% of those engaged accepted housing.

Addressing the emergency shelter and transitional housing needs of homeless persons

In this Action Plan, ESG funds are used to provide essential services to homeless families and individuals in emergency shelters as well as to support shelter operation costs. Seeing a need for more low barrier shelter beds, the City funded the development of a low-barrier facility with CDBG funds that was completed in early 2021. While ESG funds are used to assist shelter operations, the bulk of shelter operations funding comes from other resources. As shelter utilization has increased significantly over the last several years, the City has focused most funds from all resources on permanent housing options such as rapid rehousing and stabilization services. However, the City Homeless Services team coordinates emergency shelter planning during events or times of year, such as winter. Additionally, the City allocates local resources to facilities during the winter to provide overflow services and provides bus transit between the facility in the morning and evening.

Transitional housing programs have largely been targeted towards youth and people fleeing domestic violence and have a rapid rehousing component attached. This allows clients to move quickly into permanent housing once they are ready to move out of a transitional program.

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

The City's Coordinated Entry System (CES) directs individuals and families experiencing homelessness to the appropriate services needed to access the housing best suited to their needs. The CES allows the community to prioritize housing units for the most vulnerable while ensuring the housing is most appropriate for the individual or family's needs. The CES prioritizes based on vulnerability and the length of time spent homeless, with the goal of decreasing the amount of time individuals and families experience homelessness. This may include assistance in obtaining permanent housing, medical treatment, mental health treatment, counseling, supervision, and other government or private assistance available such as:

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

Every person assisted through any of the City's service programs is provided with case management. The intent of this case management is to help clients access housing, navigate the complicated systems that are required for accessing other service and financial assistance and access employment when able. Many chronically homeless individuals do require ongoing assistance or higher levels of care, but clients are moved on when possible.

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 allocations include financial assistance and case management for households that are currently housed but are at imminent risk (within two weeks) of becoming homeless. These households need temporary rent or utility assistance to prevent them from becoming homeless, or financial assistance to move to another unit. In cases where households desire to relocate from a substandard unit, it is allowable for case managers to assist in locating and moving households to housing units that meet minimum housing quality standards.

Households receiving prevention assistance may require supportive services and follow-up care. The case manager is responsible for providing the appropriate supportive services and follow-up care, as determined on a case-by-case basis. Most prevention assistance will last from one (1) to six (6) months. A standardized housing assessment and housing plan is completed for all program participants to ensure housing stability after ESG assistance terminates. Program participants must demonstrate the ability to earn sufficient income to sustain their permanent housing at the conclusion of program services.

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

In addition to these services, the City is also currently contracting a pilot diversion program that will help keep people with low barriers out of the homeless services system by providing light touch services. Through this pilot, Diversion Case Managers are imbedded at 3 emergency shelter locations to assess individuals and families entering shelter and identify those who are eligible candidates for diversion and rapid exit. Once the pilot has concluded, the program will be refined from lessons learned and scaled up to reduce the number of people becoming homeless each year.

Discussion

The City of Oklahoma City and local service providers use the Homeless Management Information System (HMIS) to track services provided to the homeless, and to prevent duplication of resources. Providers are required to record client demographic and program data in the community's 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 within 72 hours of program entry. To meet this requirement, agencies run and/or review appropriate reports weekly to ensure consistent compliance. Agencies are required to correct inaccurate or incomplete data timely. The City's HMIS administrator and performance manager provide technical assistance when needed.

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

AP-70 HOPWA Goals - 91.220 (I)(3)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	50
Tenant-based rental assistance	53
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	103

AP-75 Barriers to Affordable Housing – 91.220(j)

Introduction:

This section asks the City to describe actions to reduce the impacts of public policies on the development and retention of affordable housing. Such policies include tax policy affecting land and other property, land use controls, zoning ordinances, building codes, fees, growth limits, and policies that affect the return on residential investment.

The City of Oklahoma City conducted three important studies to identify the regulatory barriers that may influence housing affordability in the city: the Analysis of Impediments (2020), the Housing Affordability Study (2021), and the Housing Affordability Implementation Plan (2025). Each of these plans identified the city's current development and zoning codes as areas with a potential negative effect on housing production. Since 2021, the City has been working on a code update to address these issues. In addition, the City hired a Housing Strategy Implementation Manager in 2025 to implement the recommendations of the Housing Affordability Implementation Plan.

The HAS and the City's Development Code Update process identified the following areas of potential regulatory reform to encourage more affordable housing, and reduce impediments to fair housing:

- Zoning modifications, such as allowing ADUs by right. This was implemented in Oklahoma City's urban core in 2025.
- A reduction of minimum home and lot sizes in specified central neighborhoods in the city
- Clarify the definition of family
- Clarify the code's treatment of persons living in group homes
- Modify densities and development standards to accommodate a wide range of housing types and products to encourage affordability and discourage economic segregation.

Certain statewide public policies also have a direct effect on housing in the City. The Oklahoma Residential Landlord Tenant Act (ORLTA) offers little to no protection for tenants. Under the ORLTA, tenants who report issues with their units, complain about code violations, and participate in a tenant organization have no protection from retaliation.

The strategies above are currently being looked at as part of the HAIP process. The City expects to ameliorate some of the unintended negative effects of these policies during the five-year plan.

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

The City recently adopted the Housing Affordability Implementation Plan (HAIP). The Plan outlines a comprehensive strategy with specific actions for the City to complete to increase affordable housing in Oklahoma City. The goals and actions presented in the HAIP are designed to support the following 5-point strategy developed in the Housing Affordability Study (HAS, 2021). These strategies include:

1. Increase the inventory and diversity of affordable rental units,
2. Preserve the long-term affordability and habitability of new and existing housing,
3. Increase housing and shelter-supportive services,
4. Support opportunities to obtain and sustain affordable homeownership, and
5. Refine development incentives and expand funding sources and partnerships.

In implementing these strategies, the city intends to make ongoing regulatory improvements, both at the state and local level. This includes implementing local land use and development code modifications and defining city priorities and roles in improving landlord-tenant relations and legislation. Development codes updates are already underway. The City is writing new base zones for the core of the City that will allow more housing types to be developed with smaller lot sizes, including accessory dwellings within single-dwelling neighborhoods. The ADU ordinance was approved by Council in 2025. The rewrite is intended to provide more flexibility for housing developers to ultimately increase the affordability of housing projects. New zoning will require public input and approval processes and will continue over the next few years.

Currently, the City also contracts with Metro Fair Housing Council (MFHC) every year for fair housing services. MFHC processes potential Fair Housing complaints, the majority which are generally filed based on discrimination due to disability. MFHC files some complaints with HUD's Office of Fair Housing & Equal Opportunity for Oklahoma City. In addition, MFHC collects funds for Oklahoma City residents who contact MFHC with complaints of unfair treatment by housing providers. These processes raise the awareness of Fair Housing Law.

In addition, MFHC conducts Fair Housing/Fair Lending/Renters Rights Seminars and publishes Fair Housing Forum newsletters, fair housing training materials, and ads in minority newsletters serving Oklahoma City. These activities speak directly to improving the understanding of and enhance attention to compliance with fair housing law. These important activities will continue in the upcoming year.

In addition, the strategies and actions laid out in the HAIP will gradually increase the number of affordable housing units in Oklahoma City. The City is committed to increasing access to affordable housing for residents using a variety of approaches.

Discussion:

The City of Oklahoma City remains committed to ensuring equal housing opportunity for all persons. Proposed Action Plan activities for this Action Plan provide direct funding to the Metropolitan Fair Housing Council for the provision of fair housing training, compliance, and complaint processing

functions. In addition, other divisions of the Planning Department are working on a Development Codes Update that would allow for more housing to be developed by right and reduce burdens to developing housing. Continued implementation of the HAIP through this Action Plan will begin to improve housing conditions in Oklahoma City.

AP-85 Other Actions – 91.220(k)

Introduction:

This section of the Action Plan describes the City’s planned actions to carry out the following strategies outlined in the Consolidated Plan:

- Foster and maintain affordable housing
- Evaluate and reduce lead-based paint hazards
- Reduce the number of poverty-level families
- Develop institutional structure
- Enhance coordination

In addition, the jurisdiction must identify obstacles to meeting underserved needs and propose actions to overcome those obstacles.

Actions planned to address obstacles to meeting underserved needs

The City’s SNI funds are dedicated to underserved communities. This year, SNI will focus on implementing the five-year revitalization plans created for each of the three SNI neighborhoods. This will result in infrastructure investments in the neighborhoods, including sidewalks, tree plantings, and neighborhood grants.

The city continues to seek ways to support small-scale affordable rental properties. Rental housing challenges with affordability and condition were identified in the HAS and the 2025-2029 Consolidated Plan. While this Action Plan does not provide funding for programs to support rentals apart from new construction, the Housing and Community Development Division is pursuing new and creative program designs to serve low-income renters. Administrative funds have been committed to Fair Housing Enforcement to respond to ongoing concerns about tenants' rights and evictions.

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 housing. The Consolidated Plan rental housing objectives call for the creation of affordable rental housing.

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

funding becomes available, The City may release Requests for Proposals for eligible affordable housing project proposals. Housing rehabilitation activities are also funded in this Action Plan, allowing low-income residents to remain in their affordable homes.

Actions planned to reduce lead-based paint hazards

The City conducts rehabilitation activities in homes in the NRSA, which are primarily constructed before 1979. The City meets all the requirements of 24 CFR Part 35 and abates all lead as applicable in housing projects. City staff functioning in the positions of Risk Assessor or Inspector must be licensed by DEQ. At present, all the Oklahoma City rehabilitation specialists are licensed. The City has acquired XRF testing devices, and all rehabilitation inspectors are qualified to perform the tests required on residential structures, including the clearance certification after abatement work has been performed.

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

In addition, The City funds the construction of new, affordable housing in this plan, thereby increasing access to housing without Lead Based Paint hazards.

Actions planned to reduce the number of poverty-level families

The City does not have a formal anti-poverty strategy but has implemented numerous local and federal job creation and education programs to reduce poverty. In 1993, the citizens of Oklahoma City passed the first of four Metropolitan Area Projects (MAPS) initiatives to support the construction of public facilities, infrastructure, recreational facilities, and with the most recent initiative social service support for the homeless and domestic violence victims. The total public investment from MAPS funding to date is well over \$2 billion.

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

Actions planned to develop institutional structure

The City works to form relationships with a variety of organizations to better serve the needs of the residents, recognizing that certain non-profits, organizations, or private companies may be better suited

to delivering specific projects or programs than the City. To that end, city staff work with all developers, subrecipients, and contractors to ensure that the organization is given the necessary support to succeed with federal funds.

Active partners include the Homeless Alliance, Upward Transitions, the YWCA, SISU Youth, Mental Health Association of Oklahoma, Neighborhood Services Organization, Positive Tomorrows, City Care, Community Health Centers, and Pivot. These organizations also help plan and execute the annual Point In Time count with other government agencies.

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

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

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

Discussion:

The City works to accomplish as much holistic revitalization and community improvement as possible, while considering limited resources and high regulatory requirements. The Housing and Community Development Division is working to streamline processes and refocus priorities and goals as part of the Consolidated Plan and Housing Affordability Implementation Plan.

Program Specific Requirements

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

Introduction:

This section addresses the program-specific requirements for the Annual Action Plan. The Consolidated Plan Final Rule contains requirements regarding program-specific narratives in the Action Plan for CDBG and HOME. This section also includes program-specific narrative for HOPWA, ESG, and HTF.

Regarding Program Income, PI that is received will be allocated as follows: 1) PI generated from Section 108 Loan investment and repayment accounts will be used to pay Section 108 principal and interest; 2) PI that is generated by the Oklahoma City Urban Renewal Authority (OCURA) activities during the current program year may be reallocated back to OCURA for use in other CDBG eligible activities subject to review and approval by The City and compliance with all contractual requirements for use of these funds; 3) CDBG funding rebates provided by material suppliers from Oklahoma City Housing Rehabilitation Program activities will be allocated to the Oklahoma City Housing Rehabilitation Program to assist with funding additional Housing Exterior Maintenance projects; 4) 20% of all CDBG PI may be used to create additional administrative capacity, and CDBG PI may be used to fund administrative expenses during the program year in which it is realized; and 5) In accordance with CPD Notice 97-9, III.J., HOME PI deposited to the PJ's letter of credit that creates additional administrative capacity may be used by the PJ for administrative expenses incurred during the Action Year, and any excess administrative capacity will be carried forward to subsequent years. Oklahoma City forecasts PI and allocates the forecasted PI in Annual Action Year Plans. All PI is reported in IDIS and in financial reporting to HUD.

The City calculates the overall benefit of its CDBG expenditures on a three-year basis. 2026-2027 is year three of the three-year period.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	70.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

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

No other forms of investment are contemplated for the use of the HOME funds except as identified in 92.205.

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

The Homebuyer Down Payment Assistance Program (DPA) funded by Oklahoma City will utilize the Recapture Method provided in the HOME Regulations at 24 CFR 92.254(a)(5)(ii). Recapture provisions ensure that the participating jurisdiction recoups all or a portion of the HOME assistance given to a homebuyer if the housing does not continue to be the principal residence of the family for the duration of the period of affordability. The affordability period will be documented and secured by a Homebuyer Agreement Deferred Note & Mortgage in favor of The City to be released at the end of the affordability period.

The City will recoup all or a portion of the HOME assistance provided to the homebuyers if the homeowner no longer resides in the house as his or her principal residence. If the house is to be sold, the amount recouped will be prorated, subject to the availability of net proceeds. Net proceeds are here defined as the sales price minus superior loan repayment (other than for loans made with HOME funds) and minus any closing costs. The direct subsidy provided to the homebuyer, i.e., down payment and

closing cost assistance and/or the difference between the fair market value of the property and a reduced sales price attributable to HOME funds, will be recouped on a pro-rata basis per the HOME regulations at 92.254(a)(5)(ii)(A)(2). The pro-rata value will be calculated based on a monthly occupancy period (i.e., for DPA, prorated at 1/84th per month of occupancy). If the combined DPA and reduction in fair market value is equal to or greater than \$15,000.00 but less than \$40,000.00 then the affordability period will be 10 years or 120 months.

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

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 affordability period will be documented and secured by a Homebuyer Agreement Deferred Note & Mortgage in favor of The City to be released at the end of the affordability period.

The City will recoup all or a portion of the HOME assistance provided to the homebuyers if the homeowner no longer resides in the house as his or her principal residence. If the house is to be sold, the amount recouped will be prorated, subject to the availability of net proceeds. The direct subsidy provided to the homebuyer will be recouped on a pro-rata basis per the HOME regulations at 92.254(a)(5)(ii)(A)(2). The pro-rata value will be calculated based on a monthly occupancy period.

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

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

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

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(I)(2)(vii)).

Not applicable.

- 6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(I)(2)(vii)).**

Not applicable.

- 7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(I)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).**

No preferences or limitations have been imposed for rental housing projects in the current program year.

Emergency Solutions Grant (ESG)

Reference 91.220(I)(4)

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

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

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

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

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

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

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

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

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

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

5. Describe performance standards for evaluating ESG.

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

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

HOPWA: Identify the method of selecting project sponsors, including providing full access to grassroots faith-based and other community organizations.

HOPWA sponsors are selected using the following process:

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

Appendix

Budget

Programs	Prior Year Funding	YTD Spending	Balance	Carry Forward	Reallocated Prior Year Funding	Program Income	New Funding	Total Funding
Affordable Housing Rehabilitation and Retention	\$ 2,625,000.00	\$ (876,301.62)	\$ 1,748,698.38	\$ 1,547,273.67	\$ 201,424.71	\$ -	\$ 1,700,000.00	\$ 3,448,698.38
Housing Rehab Program Delivery	\$ 700,000.00	\$ (352,821.33)	\$ 347,178.67	\$ 347,178.67	\$ -	\$ -	\$ 700,000.00	\$ 1,047,178.67
Housing Exterior Maintenance Program	\$ 1,000,000.00	\$ (399,905.00)	\$ 600,095.00	\$ 600,095.00	\$ -	\$ -	\$ 750,000.00	\$ 1,350,095.00
Emergency Home Repair	\$ 600,000.00	\$ -	\$ 600,000.00	\$ 600,000.00	\$ 201,424.71	\$ -	\$ -	\$ 801,424.71
Critical Repair Initiative	\$ 325,000.00	\$ (123,575.29)	\$ 201,424.71	\$ -	\$ -	\$ -	\$ -	\$ -
Pilot Rental Rehab Program	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 250,000.00	\$ 250,000.00
SNI Public Facilities	\$ 1,200,000.00	\$ (569,576.33)	\$ 630,423.67	\$ 630,423.67	\$ 300,000.00	\$ -	\$ 676,000.00	\$ 1,606,423.67
SNI Program Delivery	\$ 136,000.00	\$ (18,864.14)	\$ 117,135.86	\$ 117,135.86	\$ -	\$ -	\$ 136,000.00	\$ 253,135.86
SNI Neighborhood Grants	\$ 109,100.00	\$ (26,546.00)	\$ 82,554.00	\$ 82,554.00	\$ -	\$ -	\$ 90,000.00	\$ 172,554.00
SNI Tree Plantings	\$ 20,000.00	\$ -	\$ 20,000.00	\$ 20,000.00	\$ -	\$ -	\$ -	\$ 20,000.00
Stockyards City Sidewalks	\$ -	\$ -	\$ -	\$ -	\$ 300,000.00	\$ -	\$ -	\$ 300,000.00
MLK Sidewalks and Infrastructure	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 450,000.00	\$ 450,000.00
Cap Hill Plaza A&E (CEC Open PO: OCITY_153388)	\$ 36,515.33	\$ (16,038.50)	\$ 20,476.83	\$ 20,476.83	\$ -	\$ -	\$ -	\$ 20,476.83
SNI PF - Capitol Hill Plaza Testing (Klienfelder Open PO COKC_PO00413)	\$ 37,577.51	\$ (6,350.00)	\$ 31,227.51	\$ 31,227.51	\$ -	\$ -	\$ -	\$ 31,227.51
Sidewalks (Cap Hill Phase 4 Parathon)	\$ 450,363.00	\$ (143,873.10)	\$ 306,489.90	\$ 306,489.90	\$ -	\$ -	\$ -	\$ 306,489.90
Sidewalks (Cap Hill Phase 4 Testing - ECS SW)	\$ 9,007.26	\$ (2,631.75)	\$ 6,375.51	\$ 6,375.51	\$ -	\$ -	\$ -	\$ 6,375.51
Sidewalks (Metro Park Phase 3) Parathon COKC_PO005392 & PSI COKC	\$ 377,098.92	\$ (354,390.84)	\$ 22,708.08	\$ 22,708.08	\$ -	\$ -	\$ -	\$ 22,708.08
SNI Capitol Hill Trail Connection Testing (Klienfelder COKC_PO004129)	\$ 3,896.10	\$ -	\$ 3,896.10	\$ 3,896.10	\$ -	\$ -	\$ -	\$ 3,896.10
Trail Connection A&E (CEC Open PO: OCITY_159636)	\$ 9,352.00	\$ (882.00)	\$ 8,470.00	\$ 8,470.00	\$ -	\$ -	\$ -	\$ 8,470.00
SNI PF Activity Allocation with Line Item Detail Undefined	\$ 11,089.88	\$ -	\$ 11,089.88	\$ 11,089.88	\$ -	\$ -	\$ -	\$ 11,089.88
General Public Facilities	\$ 1,540,041.74	\$ (153,000.00)	\$ 1,387,041.74	\$ 1,387,041.74	\$ (299,700.00)	\$ 204,678.31	\$ 2,139.20	\$ 1,294,159.25
Alpha Community Foundation (Garden Oaks Community Center)	\$ 181,265.00	\$ (143,000.00)	\$ 38,265.00	\$ 38,265.00	\$ -	\$ -	\$ -	\$ 38,265.00
Jeff Park / Paseo Joint Venture Walnut Development Infrastructure	\$ 205,576.15	\$ (10,000.00)	\$ 195,576.15	\$ 195,576.15	\$ 4,950.00	\$ -	\$ -	\$ 200,526.15
Support for Housing - AHDP	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Available for Solicitation	\$ 1,153,200.59	\$ -	\$ 1,153,200.59	\$ 1,153,200.59	\$ (304,650.00)	\$ 204,678.31	\$ 2,139.20	\$ 1,055,368.10
SNI Public Service	\$ 565,000.00	\$ (267,803.49)	\$ 297,196.51	\$ 297,196.51	\$ -	\$ -	\$ 520,000.00	\$ 817,196.51
After School Program	\$ 350,000.00	\$ (149,887.50)	\$ 200,112.50	\$ 200,112.50	\$ -	\$ -	\$ 350,000.00	\$ 550,112.50
Hazardous Tree Assessments	\$ 10,000.00	\$ (2,040.00)	\$ 7,960.00	\$ 7,960.00	\$ -	\$ -	\$ 10,000.00	\$ 17,960.00
Hazardous Tree Removal	\$ 160,000.00	\$ (113,078.49)	\$ 46,921.51	\$ 46,921.51	\$ -	\$ -	\$ 160,000.00	\$ 206,921.51
Neighborhood Cleanup Safe and Tidy (Int Assist)	\$ 45,000.00	\$ (2,797.50)	\$ 42,202.50	\$ 42,202.50	\$ -	\$ -	\$ -	\$ 42,202.50
Other	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
General Public Services	\$ 151,666.65	\$ (73,773.47)	\$ 77,893.18	\$ 77,893.18	\$ -	\$ -	\$ 227,000.00	\$ 304,893.18
CASA Child Advocacy	\$ 46,666.65	\$ (23,333.25)	\$ 23,333.40	\$ 23,333.40	\$ -	\$ -	\$ 48,000.00	\$ 71,333.40
COTPA Bus Passes and Share-A-Fare	\$ 105,000.00	\$ (50,440.22)	\$ 54,559.78	\$ 54,559.78	\$ -	\$ -	\$ 179,000.00	\$ 233,559.78
Economic Development	\$ 590,000.00	\$ (462,268.96)	\$ 127,731.04	\$ 127,731.04	\$ -	\$ -	\$ 40,000.00	\$ 167,731.04
CAA Small Business Services	\$ 40,000.00	\$ (12,268.96)	\$ 27,731.04	\$ 27,731.04	\$ -	\$ -	\$ 40,000.00	\$ 67,731.04
New View Business Assistance	\$ 450,000.00	\$ (450,000.00)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Section 108 Repayment Fund	\$ 100,000.00	\$ -	\$ 100,000.00	\$ 100,000.00	\$ -	\$ -	\$ -	\$ 100,000.00
Slum and Blight Remediation	\$ 1,038,880.00	\$ (369,511.31)	\$ 669,368.69	\$ 669,368.69	\$ -	\$ -	\$ 938,880.00	\$ 1,608,248.69
Secure Vacant & Abandoned Properties	\$ 250,000.00	\$ (51,230.50)	\$ 198,769.50	\$ 198,769.50	\$ -	\$ -	\$ 150,000.00	\$ 348,769.50
OCURA Urban Renewal Completions	\$ 788,880.00	\$ (318,280.81)	\$ 470,599.19	\$ 470,599.19	\$ -	\$ -	\$ 788,880.00	\$ 1,259,479.19
Administration, Fair Housing, and Planning	\$ 1,026,004.80	\$ (373,643.87)	\$ 652,360.93	\$ 652,360.93	\$ -	\$ -	\$ 1,026,004.80	\$ 1,678,365.73
CDBG Program Administration	\$ 888,004.80	\$ (287,551.90)	\$ 600,452.90	\$ 600,452.90	\$ -	\$ -	\$ 888,004.80	\$ 1,488,457.70
Planning	\$ 45,000.00	\$ (4,796.97)	\$ 40,203.03	\$ 40,203.03	\$ -	\$ -	\$ 45,000.00	\$ 85,203.03
Fair Housing Activities	\$ 93,000.00	\$ (81,295.00)	\$ 11,705.00	\$ 11,705.00	\$ -	\$ -	\$ 93,000.00	\$ 104,705.00
Grand Total	\$ 8,736,593.19	\$ (3,145,879.05)	\$ 5,590,714.14	\$ 5,389,289.43	\$ 201,724.71	\$ 204,678.31	\$ 5,130,024.00	\$ 10,925,716.45

Total Public Services Funding	
General Public Services	\$ 227,000.00
SNI Public Service	\$ 520,000.00
Grand Total	\$ 747,000.00
CDBG Allocation	\$ 5,130,024.00
PS of Total Allocation	14.56%
Remaining PS Availabili	\$ 22,503.60

Funding Source HOME

	Prior Year Funding	YTD Spending	Balance	Carry Forward	Reallocated Prior Year Funding	Program Income	New Funding	Total Funding
Affordable Housing Development Program	\$ 7,925,667.81	\$ (691,831.32)	\$ 7,233,836.49	\$ 6,033,836.49	\$ 1,200,000.00	\$ 359,163.55	\$ 1,437,982.84	\$ 9,030,982.88
Affordable Housing Development Program	\$ 5,306,597.49	\$ (371,610.00)	\$ 4,934,987.49	\$ 3,734,987.49	\$ 1,200,000.00	\$ 359,163.55	\$ 862,498.84	\$ 6,156,649.88
AHDP to RFP	\$ 2,234,987.49	\$ -	\$ 2,234,987.49	\$ 2,234,987.49	\$ 1,200,000.00	\$ 359,163.55	\$ 862,498.84	\$ 4,656,649.88
Alleys End	\$ 600,000.00	\$ (300,000.00)	\$ 300,000.00	\$ 300,000.00	\$ -	\$ -	\$ -	\$ 300,000.00
Creston Park Phase I (OCHA)	\$ 800,000.00	\$ -	\$ 800,000.00	\$ -	\$ -	\$ -	\$ -	\$ -
Hillocrest Green Apts	\$ 71,610.00	\$ (71,610.00)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
OCHA Vita Nova	\$ 1,200,000.00	\$ -	\$ 1,200,000.00	\$ 1,200,000.00	\$ -	\$ -	\$ -	\$ 1,200,000.00
SNI MLK New Construction SF Homes	\$ 400,000.00	\$ -	\$ 400,000.00	\$ -	\$ -	\$ -	\$ -	\$ -
CHDO Program	\$ 2,619,070.32	\$ (320,221.32)	\$ 2,298,849.00	\$ 2,298,849.00	\$ -	\$ -	\$ 575,484.00	\$ 2,874,333.00
CHDO Jefferson Park	\$ 669,405.73	\$ (320,221.32)	\$ 349,184.41	\$ 349,184.41	\$ -	\$ -	\$ -	\$ 349,184.41
CHDO Positively Paseo	\$ 815,000.20	\$ -	\$ 815,000.20	\$ 815,000.20	\$ -	\$ -	\$ -	\$ 815,000.20
CHDO Neighborhood Housing Services	\$ 193,936.11	\$ -	\$ 193,936.11	\$ 193,936.11	\$ -	\$ -	\$ -	\$ 193,936.11
CHDO Unallocated	\$ 940,728.28	\$ -	\$ 940,728.28	\$ 940,728.28	\$ -	\$ -	\$ 575,484.00	\$ 1,516,212.28
Affordable Housing Rehabilitation and Retention	\$ 850,000.00	\$ (408,612.23)	\$ 441,387.77	\$ 441,387.77	\$ -	\$ -	\$ 250,000.00	\$ 691,387.77
Whole House Rehab	\$ 850,000.00	\$ (408,612.23)	\$ 441,387.77	\$ 441,387.77	\$ -	\$ -	\$ 250,000.00	\$ 691,387.77
Downpayment Assistance Program	\$ 971,901.29	\$ (225,857.25)	\$ 746,044.04	\$ 746,044.04	\$ -	\$ -	\$ 400,000.00	\$ 1,146,044.04
Downpayment Assistance Program	\$ 971,901.29	\$ (225,857.25)	\$ 746,044.04	\$ 746,044.04	\$ -	\$ -	\$ 400,000.00	\$ 1,146,044.04
Administration, Fair Housing, and Planning	\$ 376,218.17	\$ (75,919.16)	\$ 300,299.01	\$ 300,299.01	\$ -	\$ -	\$ 231,998.09	\$ 532,297.10
HOME Program Administration	\$ 376,218.17	\$ (75,919.16)	\$ 300,299.01	\$ 300,299.01	\$ -	\$ -	\$ 231,998.09	\$ 532,297.10
Grand Total	\$ 10,123,787.27	\$ (1,402,219.96)	\$ 8,721,567.31	\$ 7,521,567.31	\$ 1,200,000.00	\$ 359,163.55	\$ 2,319,980.93	\$ 11,400,711.79

Funding Source HOPWA

Total Funding
HOPWA Programs \$ 1,419,527.00

Funding Source ESG

Total Funding
Homeless Programs \$ 444,290.00

Timeline

Public Participation Timeline
FY 2026-27 Annual Action Plan

2025

December 15 Confirm and reserve facilities for public meetings in January for onsite meetings.

December 19 **Submit** notice of Public Input sessions ad to Journal Record.

December 26 **Publish** notice of Public Input session to be held in person for the following dates and times:

Public Input Meeting 1: Meeting to be held at Capitol Hill Library, 327 SW 27th Street, Oklahoma City, OK 73109 on January 28, 2026, at 6:00 p.m.

Public Input Meeting 2: Meeting to be held at Ralph Ellison Library, 2000 NE 23rd St, Oklahoma City, OK 73111 on January 29, 2026, at 1:00 p.m.

2026

January 28 Public Input Meeting 1: Capitol Hill Library, Wednesday January 28 at 6:00 p.m.

January 29 Public Input Meeting 2: Ralph Ellison Library, Thursday January 29 at 1:00 p.m.

February- All Month

Staff to finalize strategic goals and funding recommendations based on available numbers. Draft Plan to be completed. Schedule and meet with consultants, governmental organizations, housing agencies, advocates and service providers to discuss barriers, gaps and priority needs.

February 21 Final allocations announced by HUD (*move forward regardless of date of announcement, include language about estimated allocation amounts*)

March 31 Combined Notice to be **submitted** to Journal Record for publication (*Combined Notice for 30-day comment period and Notice of Public Hearing at Council on May 5th*)

April 3 **Publication** of Combined Notice of 30-day comment period and Notice of Public Hearing. (*must publish on Friday. No Saturday or Sunday legal notices*). Publish draft Action Plan on website.

- April 3 Begin routing process for documents in Prime.Gov. Director Deadline is 4/21 for 5/5 Council Meeting *(must include a near final draft of the plan that will be submitted to HUD).*
- April 14 Staff reports due for CCCD meeting on April 9, 2024.
- April 21 Citizens Committee for Community Development meeting- Presentation to discuss and approve funding priorities for the 2026-27 Action Plan; and to address any last minute concerns or recommendations prior to City Council.
- April 28 Clerk's office deadline for May 5th City Council meeting.
- May 5 City Council public hearing and action on the Action Plan
- May 15 Submit 2026-27 Action Plan to HUD *(Generally due to HUD 60 days following HUD funding allocation announcement. May 15th is the statutory due date unless otherwise extended).*

Citizen Participation Plan

CITY OF OKLAHOMA CITY CITIZEN PARTICIPATION PLAN

This Citizen Participation Plan (CPP) outlines the City of Oklahoma City's (City) procedures for engaging citizens in developing the Consolidated Plan, Annual Action Plan, Substantial Amendments, and the Consolidated Annual Performance and Evaluation Report (CAPER), hereafter collectively, the Plans, or individually, the Plan. This CPP ensures compliance with the U.S. Department of Housing and Urban Development (HUD) requirements and promotes transparent governance. The City must submit Plan documents to HUD as a condition of receiving federal grant funding under the following programs: Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) Program, Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA).

By adhering to these procedures, the City aims to foster inclusive and effective citizen participation in its planning processes, ensuring that community development initiatives align with the needs and priorities of all residents.

Availability and Accessibility

The City will publish the Plans and Amendments in a manner that offers its residents, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments. The Consolidated Plan, current Action Plan, CAPER, and CPP will be made available on the City website at <https://www.okc.gov/departments/planning/programs/housing-neighborhood-programs>. In addition, the City will provide a reasonable number of hard copies of the Plans to residents and groups that request it. Citizens may request a digital copy via email.

The Consolidated Plan, current Action Plan, CAPER, and CPP will be provided in accessible formats upon request. The City will also strive to accommodate non-English-speaking residents by offering translation services for notices and plan documents, ensuring meaningful participation from all community members.

Encouragement of Citizen Participation

The City encourages public participation in the development of the Plans and any Substantial Amendment to the Plans. In particular, the City encourages participation by low- and moderate-income people, particularly those people living in areas designated by the jurisdiction as a revitalization area or in a slum and blighted area and in areas where CDBG funds are proposed to be used, and by residents of predominantly low- and moderate-income neighborhoods.

Generally, the City accomplishes this through public meetings where citizens have an opportunity to participate in planning for expenditure of federal funds and to gain information on the results from prior year use of these funds. In addition to inviting the public to participate, specific documents may require engagement of particular groups, such as housing providers, non-profit agencies, and neighborhood organizations to participate in focused input sessions. While the final authority for decision-making rests with the City Council, the City recognizes that public input can promote a stronger, more responsive community development effort.

In addition to citizen input, the City will invite or consult with organizations (including businesses,

developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations) in the process of developing and implementing Plan documents.

Information will also be shared with the local public housing agency (PHA) to encourage participation of residents of public and assisted housing developments (including any resident advisory boards, resident councils, and resident management corporations) in the process of developing and implementing the Plans, along with other low-income residents of targeted revitalization areas in which the developments are located. The City provides information to the PHAs about the Plan strategy and activities related to PHA developments and surrounding communities so that the PHAs can make this information available at their annual public hearing(s).

Mechanisms for Public Engagement

Planning Meetings

When creating the Consolidated Plan and Annual Action Plans, the City will hold at least one public meeting to obtain citizen input. The meeting(s) shall be held before the Plan or Annual Action Plan is written and shall be considered a planning meeting.

For the Consolidated Plan, there should be a minimum of two planning meetings, and four planning meetings are recommended. For the annual Action Plan, one planning meeting is acceptable.

Citizens will be provided at least a thirty (30) day notice of the meetings via publication in a widely circulated newspaper and a post on the City’s Housing and Neighborhood Programs website. When possible, the City will also notify the public of meetings via news releases, TV appearances, and social media posts.

CCCD Public Meetings

The City will discuss the Consolidated Plan, Annual Action Plan, Substantial Amendments, and CAPER drafts at a public meeting of the Citizen’s Committee for Community Development (“CCCD”). Established over 25 years ago, the CCCD is an official advisory committee to the City Council with members appointed by the Mayor and City Council to represent the interests of lower-income people. Two representatives are appointed from each Ward, and the Mayor appoints four members at large.

CCCD meetings are open public meetings held several times a year and provide a forum for citizens to discuss issues or concerns about activities funded by federal grant programs. The CCCD considers and makes recommendations to the City Council on all Plan matters and is an important step in the citizen review process.

CCCD meeting dates where Plans will be discussed will be included in public notices, website notices, and social media posts if known.

Public Hearing and Public Comment Period

The City will provide a reasonable opportunity for citizens to comment on the Consolidated Plan, Annual Action Plan, and any Substantial Amendments before final adoption by publishing notice in a widely distributed area newspaper and on the City’s Housing and Neighborhood Programs website. The full Plan draft will be published on the City’s Housing and Neighborhood Programs

website at this time. The City will provide a minimum 30-day public comment period to review and comment on the proposed Plan or Amendment. The notice will also provide the date of the applicable public hearing to be held at a regularly scheduled meeting of the City Council. During the public hearing, comments can be made about the proposed Plan or Amendment.

Comments Received During the Public Hearings and During the Comment Period

When the City publishes notices requesting public comment for Plan documents, the City shall include the following address for the submission of written comments:

Housing and Community Development Division Manager, Planning Department
City of Oklahoma City
420 W Main St., Ste. 920
Oklahoma City, 73102

The City shall consider and respond to all comments received during public hearings and the comment period. A summary of comments or views received and the determination of acceptance or non-acceptance, and reasons for the non-acceptance (when applicable) will be attached and made a part of the final Plan document(s).

The Plans

The Consolidated Plan

The Consolidated Plan serves as the five-year planning framework and application for HUD funding under the CDBG, HOME, ESG, and HOPWA programs. The City uses HUD-provided data available to the public on HUD's website, data.hud.gov, to develop the Consolidated Plan. The five-year Plan will include the first-year Action Plan, followed by annual one-year Action Plans prepared and made available to the public each subsequent year. This Plan makes available to citizens, public agencies and interested parties the following information:

- The estimated amount of assistance the City expects to receive during a given funding year, including program income.
- The range of activities that may be undertaken including the estimated activities and funding levels that will benefit persons with low- and moderate-income.

When creating the Consolidated Plan, the City will hold at least two public meetings to obtain citizen input. The meeting(s) shall be held before the Plan is written and shall be considered a planning meeting. For the Consolidated Plan, there should be a minimum of two planning meetings, and four planning meetings are recommended. Citizens will be provided with at least a thirty (30) day notice of the planning meetings via publication in a widely circulated newspaper and a post on the City's Housing and Neighborhood Programs website. When possible, the City will also notify the public of meetings via news releases, TV appearances, and social media posts.

The City will discuss the Consolidated Plan at a public meeting of the Citizen's Committee for Community Development ("CCCD"). The CCCD considers and makes recommendations to the City Council on all Plan matters and is an important step in the citizen review process. CCCD meeting dates where the Consolidated Plan will be discussed will be included in public notices, website notices, and social media posts if known.

The City will provide a reasonable opportunity for citizens to comment on the Consolidated Plan,

Annual Action Plan, and any Substantial Amendments before final adoption by publishing notice in a widely distributed area newspaper and on the City’s Housing and Neighborhood Programs website. The full Plan draft will be published on the City’s Housing and Neighborhood Programs website at this time. The City will provide a minimum 30-day public comment period to review and comment on the proposed Plan or Amendment. The notice will also provide the date of the applicable public hearing to be held at a regularly scheduled meeting of the City Council. During the public hearing, comments can be made about the proposed Plan or Amendment.

Any comments or views of residents of the community received in writing, or orally at the public meetings or hearing will be considered in preparing the final consolidated plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, shall be attached to the final consolidated plan.

Annual Action Plan

The Annual Action Plan states the amount of assistance the City expects to receive from each of the federal programs and includes a description of the activities and related funding allocations that the City will undertake to address the needs and priorities established in the five-year Consolidated Plan.

When creating the annual Action Plan, the City will hold at least one public meeting to obtain citizen input. The meeting(s) shall be held before the annual Action Plan is written and shall be considered a planning meeting. For the annual Action Plan, one planning meeting is required. Citizens will be provided at least a thirty (30) day notice of the planning meeting via publication in a widely circulated newspaper and a post on the City’s Housing and Neighborhood Programs website. When possible, the City will also notify the public of meetings via news releases, TV appearances, and social media posts.

The City will discuss the annual Action Plan draft at a public meeting of the Citizen’s Committee for Community Development (“CCCD”). The CCCD considers and makes recommendations to the City Council on all Plan matters and is an important step in the citizen review process. CCCD meeting dates where the Action Plan will be discussed will be included in public notices, website notices, and social media posts if known.

The City will provide a reasonable opportunity for citizens to comment on the Annual Action Plan before final adoption by publishing notice in a widely distributed area newspaper and on the City’s Housing and Neighborhood Programs website. The full Plan draft will be published on the City’s Housing and Neighborhood Programs website at this time. The City will provide a minimum 30-day public comment period to review and comment on the proposed Plan. The notice will also provide the date of the applicable public hearing to be held at a regularly scheduled meeting of the City Council. During the public hearing, comments can be made about the proposed Plan.

Any comments or views of residents of the community received in writing, or orally at the public meetings or hearing will be considered in preparing the final Action Plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, shall be attached to the final Action Plan.

Substantial Amendments

The Action Plan will be amended whenever there is a Substantial Amendment, defined as:

- Changing the goals or priority needs contained in the Five-Year Strategy.
- Funding of an activity type not described in the Annual Action Plan.
- Increasing funding allocated to a project by more than 25%

A Minor Amendment is a change to the Consolidated Plan or Action Plan that does not meet the threshold criteria for a Substantial Amendment. Minor Amendments are administrative and do not require public notice.

The City will discuss the Substantial Amendment draft at a public meeting of the Citizen’s Committee for Community Development (“CCCD”). The CCCD considers and makes recommendations to the City Council on all Plan matters and is an important step in the citizen review process. CCCD meeting dates where the Substantial Amendment will be discussed will be included in public notices, website notices, and social media posts if known.

The City will provide a reasonable opportunity for citizens to comment on the Substantial Amendment before final adoption by publishing notice in a widely distributed area newspaper and on the City’s Housing and Neighborhood Programs website. The full Substantial Amendment draft will be published on the City’s Housing and Neighborhood Programs website at this time. The City will provide a minimum 30-day public comment period to review and comment on the proposed Plan. The notice will also provide the date of the applicable public hearing to be held at a regularly scheduled meeting of the City Council. During the public hearing, comments can be made about the proposed Plan.

Any comments or views of residents of the community received in writing, or orally at the public meetings or hearing will be considered in preparing the final Substantial Amendment. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, shall be attached to the final Substantial Amendment.

Consolidated Annual Performance and Evaluation Report (CAPER)

This report describes the accomplishments achieved with federal funds during the previous funding year, including how funds were actually used and the extent to which these funds were used for activities that benefited low- and moderate- income residents. The City’s fiscal year for expenditure of HUD funds begins July 1 and ends June 30 of the following year. This report is submitted to HUD within 90 days of the close of the program year, that is, no later than September 30 of each year.

The City will discuss the CAPER draft at a public meeting of the Citizen’s Committee for Community Development (CCCD). The CCCD considers and makes recommendations to the City Council on all Plan matters and is an important step in the citizen review process. CCCD meeting dates where the CAPER will be discussed will be included in public notices, website notices, and social media posts if known.

The City will provide a reasonable opportunity for citizens to comment on the CAPER before final adoption by publishing notice in a widely distributed area newspaper and on the City’s Housing and Neighborhood Programs website. The full CAPER draft will be published on the City’s Housing and Neighborhood Programs website at this time. The City will provide a minimum 15-day public comment period to review and comment on the proposed CAPER. The notice will also provide the date of the applicable public hearing to be held at a regularly scheduled meeting of the City Council. During the public hearing, comments can be made about the proposed CAPER.

Any comments or views of residents of the community received in writing, or orally at the public meetings or hearing will be considered in preparing the final CAPER. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, shall be attached to the final CAPER.

Substantial Changes to the Citizen Participation Plan

Substantial changes to the CPP will be noticed in newspapers of wide circulation and on the City's website. The full amended CPP will be posted on the City's website, and hard copies will be available upon request. Citizens will have thirty (30) days to review the amended Citizen Participation Plan.

Technical Assistance

Groups representative of persons with low and moderate incomes may seek assistance and information regarding activities addressed in this Citizen Participation Plan or funding opportunities that may be available through the Housing & Community Development Division.

Complaints

A citizen or organization that wishes to file a complaint or grievance concerning Consolidated Plan activities or programs may contact the City at the address listed in Section C above. The City will provide a written response to every written citizen complaint within 15 working days where practicable. If not satisfied with the response, the citizens or organization concerned may contact the Planning Director describing the problem, the response of the Department concerned, and what further action is believed needed.

Anti-Displacement

The City's overall goal is to minimize the displacement of its residents. However, when displacement is unavoidable, the City will develop an Anti-Displacement and Relocation Plan in accordance with federal regulations. Specifically, the City will comply with the anti-displacement and relocation requirements of the Uniform Relocation Act and the Housing & Community Development Act of 1974, as amended, and implementing regulations of 24 CFR Part 42.

Public Comments

Summary of Public Comments from Public Input

Meetings:

Key Themes:

- **Affordable Housing:** Strong demand for more affordable housing in Oklahoma City.
- **Homelessness:** Homeless services came up repeatedly, with many citizens requesting resources for unhoused individuals.
- **Education & Awareness:** We hear of a lack of public awareness about available programs and resources. Many residents had suggestions for community resource events, collaboration, and better outreach. There is a need for training for homebuyers, small-scale developers, and real estate professionals.
- **Neighborhood Concerns:** Vacant land and buildings lead to vandalism and crime and negatively impact neighborhoods.

Analysis of Comments:

Distinct comments analyzed: 41

By session:

- Public Input Session 1: 26 comments
- Public Input Session 2: 15 comments

Because comments can touch multiple topics, topic totals will exceed the total number of comments.

Topic prevalence (share of all 41 comments):

- Affordable Housing: 20 comments (48.8%)
- Homelessness: 12 comments (29.3%)
- Education & Awareness: 11 comments (26.8%)
- Collaboration & Coordination: 8 comments (19.5%)
- Policy & Funding: 6 comments (14.6%)
- Neighborhood Concerns: 5 comments (12.2%)
- Youth & Arts Programming: 4 comments (9.8%)
- Economic Opportunities / Workforce: 2 comments (4.9%)
- Transportation: 1 comment (2.4%)

Public Comments Received:

Public Input Session 1

Capitol Hill Public Library

January 28, 2026, 6:00 PM

Comment:

There is a need for more affordable housing in Oklahoma City. Homelessness is also a need in the Capitol Hill neighborhood, but the homeless services are concentrated in Downtown OKC.

City Response:

Thank you for your comment. The city is actively working to increase affordable housing and will continue to do so, using HUD funds and GOLT funding approved in 2025.

Comment:

I work in homeless services and want to decrease homelessness. Focusing on housing addresses both the goal of reducing homelessness, but also adding housing, and economic development. Our organization does not have enough housing units to move people into from homelessness. The city should continue investing in affordable housing and focusing on the goal to increase affordable housing opportunities

City Response:

Thank you for your comment. The city is actively working to increase affordable housing and will continue to do so, using HUD funds and GOLT funding approved in 2025.

Comment:

What are the units we consider to be affordable? Often units designated as affordable are not actually very affordable.

City Response:

The city uses HUD's definitions of affordable to set maximum rents for affordable units. Property owners may set rents lower than this if they wish to target units to lower-income populations.

Comment:

Is the city rehabilitating properties to be affordable?

City Response:

Yes. The city has a housing rehab program for owner-occupied residences.

Comment:

What are the educational opportunities for homebuyers? What are the education opportunities for small-scale developers on how to access city funds?

City Response:

Thank you for your comment. This is currently a need within the city. PlaceKeepers is a nonprofit organization that does some of this work, but more is needed.

Comment:

The city's Urban Renewal Authority provides resources to developers, but often other people don't know how to access those resources. It would be helpful to provide more education on these opportunities. There is often a significant amount of red tape with OCURA and HUD opportunities, and maybe the city could work to train real estate professionals and others on how to access affordable housing programs.

City Response:

Thank you for your comment. The city recognizes this need and is working towards improving access and education on these resources.

Comment/Question:

What are the efforts being made to prevent homelessness?

City Response:

The city does have a diversion program, and it is an eligible expense under ESG funding. There is frequently not enough money to meet the very large demand, so we must target homeless funds. Prevention is challenging programmatically.

Comment:

Homelessness is often caused by federal and state policies and care of homelessness is the city's responsibility. Oklahoma municipalities are funded by sales taxes, which is a very limited and inconsistent funding source. The city does a good job of focusing on and targeting limited funds. The SNI and MAPS programs work because they are focused. The need is huge, and the funding is a pittance.

City Response:

Thank you for your comment. We will continue to focus funds on specific neighborhoods to maximize impact.

Comment:

Part of the goals should be an increased focus on prevention of homelessness. Is there something to be done to keep people housed?

City Response:

Thank you for your comment. The current diversion program funded by CoC funds does focus on prevention. We also have some legal assistance available at the county courthouse and are working to extend the eviction timeline with legislators.

Comment:

Seniors often come to NHS because of rising housing costs, like taxes and insurance. Most own their home. Some then choose to be underinsured, putting them at risk if a disaster strikes. Some seniors only need a little assistance to cover insurance costs. Once their insurance is cancelled it is much harder to

get reinsured. Also, if they lose their home and it becomes vacant, then it is a blight in the neighborhood.

City Response:

Thank you for your comment. The city will continue to prioritize housing, including aging in place.

Comment:

I attended to advocate for the arts, particularly in affordable housing. The city should consider incorporating arts programming into goals.

City Response:

Thank you for your comment. The city will continue to prioritize housing, including housing for artists.

Comment:

The city should add youth programming. The city is constructing two new MAPS Youth Centers on the Southside because we have the highest youth crime rates. Programming for kids, including arts programming, helps drive down crime. The city should extend youth and arts programming to neighborhoods outside of SNI areas.

City Response:

Thank you for your comment. The city is extending youth programming into neighborhoods all over the city with MAPS investments in community and youth centers. Funds are currently targeted to SNI neighborhoods where there is the greatest need, to maximize the impact of limited federal funding.

Comment:

Regarding education and affordable housing. Could OKMAR collaborate with the city to offer training?

City Response:

Thank you for your comment. Yes, the city is happy to collaborate with OKMAR.

Comment:

Can funds be used to add an ADU to someone's home?

City Response:

Thank you for your comment. Yes, these funds can be used for that purpose.

Comment:

What overlap do these programs have with Community Action Agency?

City Response:

Thank you for your comment. We currently offer programs through Community Action Agency, including Small Business Assistance and Down Payment Assistance. CAA will also play a role in the Choice Neighborhoods Initiative at Will Rogers Courts.

Comment:

How can we get more funding and how can we get the rules changed?

City Response:

Thank you for your comment. At the state level, several local lawmakers are working to change rules around eviction and housing. At the federal level, you may speak with your representatives about the regulatory changes needed.

Comment:

Does the Planning Department lobby?

City Response:

Thank you for your comment. The city has a legislative liaison who advocates for policies on the city's behalf.

Comment:

The Oklahoma Housing Stability Coalition is currently working with Stephanie Bice's office.

City Response:

Thank you for your comment.

Comment:

Are there ways to advocate on the county level? Is there a way to get a reduction in costs for seniors, such as limits on the increase in assessed value?

City Response:

Thank you for your comment. Yes, you may contact your county representatives. OKMAR has also done some work on this issue.

Comment:

ADU's can provide opportunities for seniors to downsize.

City Response:

Thank you for your comment. The city is committed to exploring creative housing solutions to increase affordable housing.

Comment:

The city should provide more education. There are a lot of programs discussed here but no one knows about them. More awareness of programs would be beneficial. For example, a community resources event.

City Response:

Thank you for your comment. The city recognizes this need and is working towards improving access and education on these resources.

Comment:

There is also a lack of knowledge about resources and opportunities and available information.

City Response:

Thank you for your comment. The city recognizes this need and is working towards improving access and education on these resources.

Comment:

Over the last decade, organizations and the city have been doing better to collaborate on homelessness and recognizing what each organization does well. However, organizations can still be siloed. Mental health impacts homelessness, but homeless organizations can't do the mental health piece. Some hospitals discharge patients directly to homeless shelters. How could the city help increase collaboration across sectors like mental health and homelessness?

City Response:

Thank you for your comment. The city recognizes this need and is working towards improving collaboration across these sectors.

Comment:

Some places have transitional housing for those being discharged from hospitals.

City Response:

Thank you for your comment. City Care and Catholic Charities both have these types of beds, but they are limited. Sometimes hospitals still discharge individuals into homelessness regardless of the available resources. This is an issue that requires collaboration across sectors.

Comment:

Money should be put towards housing options for those being discharged from hospitals.

City Response:

Thank you for your comment. The city is prioritizing the development of affordable housing, with an emphasis on permanent housing options for all residents.

Comment:

the city has published helpful resource documents for people looking to support those experiencing homelessness. Can we do something like that for other housing resources?

City Response:

Thank you for your comment. The city recognizes this need and is working towards improving access and education on these resources.

Comment:

It would be helpful to have developer resources as well. There could potentially be a continuing education for realtors.

City Response:

Thank you for your comment. The city recognizes this need and is working towards improving access and education on these resources.

Public Input Session 2

Ralph Ellison Library

January 29, 2026, 1 PM

Comment:

There is a lot of vacant land in our neighborhood owned by the Housing Authority. Who are the players coming up with a plan for Creston Park? The residents were kicked out of their housing with no plan for reconstruction. The Foster Center is the same way. We were kicked out of the building in 2023 and told the construction would be completed in 2024. Vacant building cause vandalism and homelessness and attract bad actors. We were told there was a plan. This seems like a cycle on the East Side.

City Response:

Thank you for your comment. The city is working with the housing authority and other nonprofits to develop a plan for Creston Park that will be supported by the neighborhood and reduce the funding gap.

Comment:

How much funding was the Creston Park project short?

City Response:

Thank you for your comment. The approximate gap was \$8-10 million, according to the Housing Authority

Comment:

Regarding Will Rogers Courts, I have clients who live in Will Rogers Courts and struggle with addiction at Will Rogers Courts. It is a challenging environment for them to stay sober. Is it possible for these clients to move to other public or HUD housing?

City Response:

Thank you for your comment. The Housing Authority may be better equipped to help your clients.

Comment:

Undocumented residents can't participate in programs despite need. They are often being discriminated against. The city needs to protect immigrants.

City Response:

Thank you for your comment. The city does not ask for immigration status to access city services and does not discriminate based on immigration status. However, most HUD programs discussed in this meeting are limited to legal residents of the United States.

Comment:

Related to the "increase economic opportunities" goal. Workforce development is essential for ending homelessness. What does the city do in that realm?

City Response:

Thank you for your comment. The city currently supports small business assistance through Community Action Agency. In addition, when funds are available, economic development activities are undertaken to support the preservation of jobs benefitting low and moderate income households.

Comment:

Do you have pamphlets with information about programs and resources? Where do we go to access this information?

City Response:

Thank you for your comment. The city recognizes this need and is working towards improving access and education on these resources.

Comment:

I live in NEOKC, near Spencer. There are no initiatives in that area for dealing with housing. Other people are coming back to this area but there are so many vacant homes and squatters. They bring negative elements to the neighborhood. The Action Center does not result in action. When there is a budget or initiative, we don't get anything. We still pay OKC taxes but do not get anything, it is discouraging. Is there something you can give me to get in touch with people? When we call animal welfare there is no response. The neighbors are often elderly and sick and cannot help. Minnis Lakeview Park was going to be closed. A bunch of neighbors organized to keep the park, and we thought we would get upgrades.

However, we did not get an investment. If we are part of the city, it should be equal opportunity for funding. It shouldn't depend on getting neighbors together.

City Response:

Thank you for your comment. The city recognizes this need and is working towards improving access and education on available resources. Often, the best way to improve your neighborhood is to organize neighbors and advocate for your neighborhood. Organizations like the Neighborhood Alliance can provide support for neighborhood associations and can connect neighborhoods with available resources.

Comment:

Related to the goal of decreasing and preventing homelessness. There is a problem with shelters being full. When trying to find places for youth leaving foster system, there is nowhere for them to go. Can we build more shelters? There are always specific criteria for who can enter the shelter. Are there areas where these facilities can be built?

City Response:

Thank you for your comment. Shelters are an eligible expense with HUD funding.

Comment:

What would a plan to build more shelters look like?

City Response:

Thank you for your comment. The city is prioritizing the development of affordable housing, with an emphasis on permanent housing options for all residents. The development of affordable housing helps reduce the demand for transitional shelters.

Comment:

The nonprofit sector in Oklahoma city is very strong. I work at Sunbeam. Our donors do not want us to duplicate services. However, everyone is stretched very thin, and the admin burden for the work we do is very high, so adding meetings would be challenging. Many agencies don't have spare staff. The city could coordinate conversations between service providers, hospitals, and mental health services. The agencies here work really well together.

City Response:

Thank you for your comment. The city recognizes this need and is considering exploring routes to better facilitate conversations between service providers and hospitals.

Comment:

I work at the Oklahoma Coalition for Children and Youth. When we have meetings with organizations, there are so many available services that people don't access because no one knows they exist. With

211, organizations don't update services and availability. Often services are there but no one knows about it. Schools often don't know about resources and aren't connecting people.

City Response:

Thank you for your comment. The city recognizes this need and is working towards improving access and education on these resources.

Comment:

There seems to be a communication issue with resources and availability.

City Response:

Thank you for your comment. The city recognizes this need and is working towards improving access and education on these resources.

Comment:

I am a shelter provider. There is a lot of communication with hospitals. We can build more shelters, but they are just waiting rooms for housing. We need more housing.

City Response:

Thank you for your comment. The city recognizes this need and is working towards improving access and education on these resources. In addition, the city is prioritizing affordable housing development, to address the need for affordable housing and to reduce homelessness.

Comment:

Sometimes you call 211 and get sent in a circle. The city needs more programs and we need more housing. Often it is very expensive to move into a new rental home. Housing is not affordable.

City Response:

Thank you for your comment. The city recognizes this need and is working towards improving access and education on these resources, as well as building more affordable housing.

Comment:

The city should pinpoint the barriers with populations, such as transportation.

City Response:

Thank you for your comment. We do provide subsidized bus fares through the Central Oklahoma Transportation and Parking Authority.

LaVictoire, Rebecca

From: [REDACTED]
Sent: Friday, January 9, 2026 9:40 AM
To: HCD
Subject: City's 2026-2027 Action Plan

You don't often get email from kristin@vergeokc.com. [Learn why this is important](#)

Input for your consideration towards workforce and economic development in Oklahoma City.

The Verge OKC – History and Mission: Founded in 2022, The Verge OKC is Oklahoma City's only 501(c)(3) nonprofit entrepreneurship hub, intentionally created to support, serve, and champion diverse founders. Our mission is to connect entrepreneurs with the people, resources, and capital they need to transform bold ideas into impactful businesses, fueling long-term economic growth for our community.

The Problem We Address: Oklahoma faces a persistent gap in entrepreneurial support. Although 62% of Americans dream of starting a business, fewer than 2% ever do. Barriers such as lack of access to capital, limited entrepreneurial literacy, and siloed support networks disproportionately affect women, people of color, and those from low-income backgrounds. With Oklahoma's poverty rate among the highest in the nation, increasing entrepreneurship by just 1% could reduce poverty by 2%. The Verge OKC exists to break down these barriers and prove that success doesn't require moving to the coasts—innovators can thrive right here in the heartland.

Populations We Serve: The Verge serves founders from all walks of life—from taco truck owners to high-growth tech startups. Our membership reflects the city's diversity: 52% female, 48% male; 13% Asian, 12% Black, 8% Multiracial, 4% Hispanic/Latino, and 63% White. We collaborate with the Greater OKC Asian, Black, and Hispanic Chambers of Commerce, Progress OKC, Oklahoma Women in Technology, and others to intentionally reach underserved entrepreneurs and neighborhoods.

Our Location: The Verge is located in The Citizen building in downtown Oklahoma City, across from the Oklahoma City National Memorial. This new, 27,000-square-foot facility provides coworking, private offices, and flexible event and training spaces, doubling our capacity to serve founders.

Primary Programs and Services: As a certified small business incubator through the Oklahoma Department of Commerce, The Verge offers:

*Education & Training: Workshops, bootcamps (e.g., OK Coders), and leadership training.

*Incubation & Acceleration: Office space, mentorship, and business development support.

*Networking & Mentorship: Signature events like *Pitches, Pizza & Pints*, Funding Fridays, Mentor Days, and 1Million Cups.

*Access to Capital: Connections to venture capital firms, angel investors, and financial literacy programs.

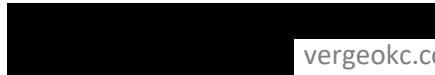
*Community Impact: Collaborations with over 50 partners to foster inclusive entrepreneurship across Oklahoma City neighborhoods.

By championing founders at every stage, The Verge OKC is building a more inclusive economy, creating high-quality jobs, and positioning Oklahoma City as the next hub for innovation and entrepreneurship.



Kristin Garcia MAA

Executive Director, The Verge OKC



vergeokc.com

600 N. Robinson Ave #500,, Oklahoma City, 73102



City Council Memo and Resolution

[This document will be inserted in the final version of the Action Plan]

Glossary of Terms

Glossary

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

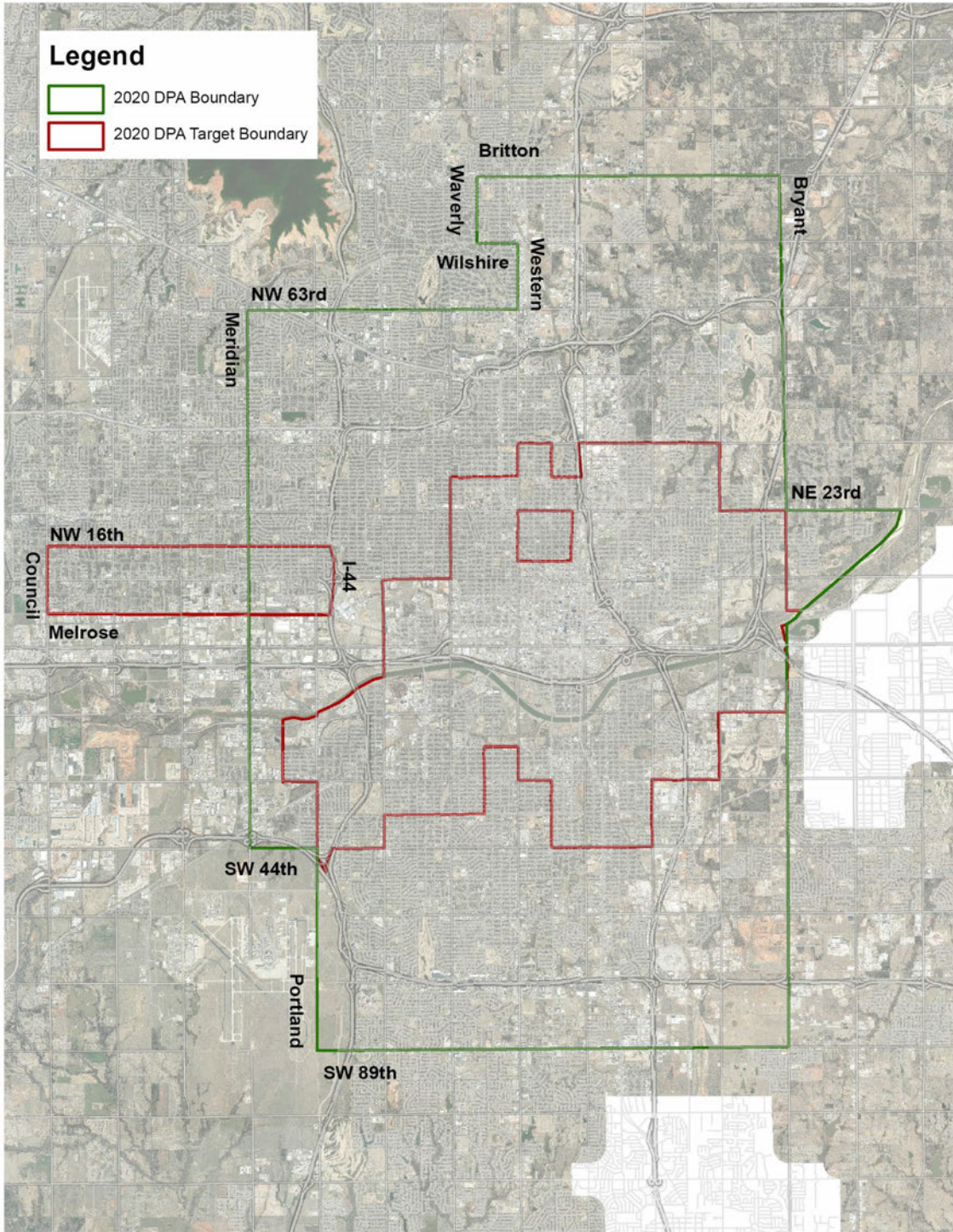
HPRP	Homelessness Prevention Rapid Rehousing Program
HTF	Housing Trust Fund
HUD	Housing and Urban Development
LIHTC	Low Income Housing Tax Credits
LMI	Low to Moderate Income
MSA	Metropolitan Statistical Area
MAPS	Metropolitan Area Projects
NHS	Neighborhood Housing Services
NIMBY	Not In My Backyard
NRSA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

Down Payment Assistance Program Boundaries

APPENDIX 7

DOWN PAYMENT ASSISTANCE PROGRAM BOUNDARIES

(last revised 2020)



Emergency Solutions Grant Policies and Procedures



Oklahoma City Continuum of Care

CoC/ESG

Written Standards

OVERVIEW

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

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

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

CONTINUUM OF CARE PURPOSE

The primary purpose of the Continuum of Care is to:

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

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

FUNDING AWARD PROCESS OVERVIEW

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

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

UNIVERSAL STANDARDS

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

PARTICIPANT ELIGIBILITY

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

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

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

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

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

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

COORDINATED INTAKE AND REFERRAL SYSTEM

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

EMERGENCY TRANSFER PLAN

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

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

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

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

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

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

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

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

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

HOUSING FIRST

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

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

HMIS

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

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

INCOME DETERMINATION

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

COORDINATION WITH MAINSTREAM AND TARGETED HOMELESS PROVIDERS

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

DISCHARGE PLANNING

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

EDUCATIONAL ASSURANCES

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

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

INVOLUNTARY FAMILY SEPERATION

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

TERMINATION OF ASSISTANCE

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

OCCUPANCY STANDARDS

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

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

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

LEAD-BASED PAINT

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

HOMELESS PARTICIPATION

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

FAITH-BASED ACTIVITIES

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

NON-DISCRIMINATION

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

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

PROGRAM INCOME

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

RECORDKEEPING

Program participant records shall include written:

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

Program policies and procedures shall indicate:

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

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

Financial records shall include:

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

CONFIDENTIALITY

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

PREVENTION AND RAPID RE-HOUSING STANDARDS

ELIGIBILITY

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

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

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

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

PRIORITY POPULATIONS

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

SERVICE TYPE, AMOUNT & DURATION

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

a) Financial Assistance:

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

b) Rental Assistance

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

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

PERMANENT SUPPORTIVE HOUSING STANDARDS

ELIGIBILITY

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

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

DOCUMENTS REQUIRED AT INTAKE

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

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

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

PRIOTIZATION FOR PSH BEDS DEDICATED OR PRIORTIZED FOR CHRONIC HOMELESSNESS

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

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

PRIOTIZATION FOR PSH BEDS NOT DEDICATED OR PRIORTIZED FOR CHRONIC HOMELESSNESS

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

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

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

PARTICIPANT CONTRIBUTION

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

TRANSITIONAL HOUSING STANDARDS

ELIGIBILITY

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

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

DOCUMENTS REQUIRED AT INTAKE

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

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

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

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

PRIORITY POPULATIONS

In providing transitional housing providers shall prioritize the following populations:

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

MINIMUM STANDARDS

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

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




Homeless Definition

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



Homeless Definition

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

Commonly Referred to Links

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

SF424s and Certifications

[This document will be inserted in the final version of the Action Plan]