

The City of Oklahoma City
Consolidated Annual Performance Evaluation Report
(CAPER)
2024-2025



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

Submitted November 30th, 2025

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Cover Image: Child playing at the new Dewey Park, engineering paid for with CDBG funds.

Dewey Park

Photo Credit: Oklahoma City Strong Neighborhoods Initiative

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan.
91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

As a HUD grantee, the City of Oklahoma City is required to publish a report detailing the utilization of the City's formula grant funds (CDBG, HOME, ESG, HOPWA) and associated accomplishments annually. The report, known as the Consolidated Annual Performance Evaluation Report (CAPER), corresponds to the priorities identified in the 2020-2024 Five-Year Consolidated Plan and specifically the activities planned in the FY2024-25 Fifth Year Action Plan. Information in this CAPER demonstrates the City's efforts to manage, fund, and deliver inclusive community development projects and services to residents in the Fifth program year (July 1, 2024, through June 30, 2025) of the Consolidated Plan period.

The City continues to prioritize affordable housing development and rehabilitation, with an emphasis on targeted neighborhood revitalization, prioritizing activities within the Neighborhood Revitalization Strategy Area (NRSA). A summary of major highlights is below. The full list of accomplishments and expenditures by activity is included in Appendix 2.

Provide Decent Housing. To promote decent, affordable housing, the City administered rehabilitation programs, provided shelter for people experiencing homelessness, and funded the new construction of homes for sale or rent.

- 55 low- to moderate-income (LMI) households received home repair or rehabilitation through the City's Housing Exterior Maintenance Program, Whole House Rehab Program, and the Community Action Agency's Emergency Home Repair program.
- Fourteen (14) affordable units were rehabilitated by the Oklahoma City Housing Authority.
- Thirty-one (31) LMI households received down payment assistance to purchase a home.
- Thirteen (13) affordable homes were constructed and sold to LMI buyers.
- 3,267 people at risk of homelessness or experiencing homelessness received homeless prevention, street outreach, rapid rehousing, and emergency shelter services with ESG funding.
- 60 households living with HIV/AIDS received permanent housing assistance, and 53 households living with HIV/AIDS received tenant-based rental assistance.

Suitable Living Environment. To promote a safe and suitable living environment with adequate public facilities and services to ensure a high quality of life, the City regularly funds public facilities improvements and public services in low- to moderate-income neighborhoods.

- 850 youth attended after-school STEAM programs in SNI neighborhoods.
- 73 children received a court appointed special advocate through CASA.
- 50,829 free bus passes were provided to low-income residents

Expanding Economic Opportunities. To promote local economic opportunities, the City of Oklahoma City continues to implement policies on Section 3 and MBE/WBE. In addition, the City funded small business training for 67 businesses through the Community Action Agency's Small Business Services.

Federal regulations require the CAPER to be submitted to HUD no later than ninety (90) days after the end of the fiscal year, which ended on June 30, 2025. The City of Oklahoma City requested and received a 60-day extension to November 30, 2025. The Citizens' Committee for Community Development held a public meeting on November 18, 2025, to review accomplishments and accept citizens' comments on the programs and activities funded during the 2024-2025 Action Year. Notice of the meeting was posted on the City's Community Development webpage on and published in The Journal Record on October 17, 2025. The CAPER and associated public notice can be viewed on the [Housing and Neighborhood Programs](#) section of the City of Oklahoma City's website.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Administration Planning and Fair Housing	Program Administration	CDBG: \$ / HOME: \$	Other	Other	1780	1769	99.38%	400	0	0.00%
Affordable Housing Construction and Development	Affordable Housing	CDBG: \$ / HOME: \$	Rental units constructed	Household Housing Unit	65	58	89.23%	243	0	0.00%
Affordable Housing Construction and Development	Affordable Housing	CDBG: \$ / HOME: \$	Rental units rehabilitated	Household Housing Unit	0	4		0	4	
Affordable Housing Construction and Development	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Added	Household Housing Unit	41	30	73.17%	16	7	43.75%

Affordable Housing Construction and Development	Affordable Housing	CDBG: \$ / HOME: \$	Homelessness Prevention	Persons Assisted	0	0		75	0	0.00%
Affordable Housing Retention and Rehabilitation	Affordable Housing	CDBG: \$ / HOME: \$	Rental units constructed	Household Housing Unit	0	0				
Affordable Housing Retention and Rehabilitation	Affordable Housing	CDBG: \$ / HOME: \$	Rental units rehabilitated	Household Housing Unit	50	160	320.00%			
Affordable Housing Retention and Rehabilitation	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	1035	1615	156.04%	218	26	11.93%
Affordable Housing Retention and Rehabilitation	Affordable Housing	CDBG: \$ / HOME: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	800	327	40.88%			
Affordable Housing Retention and Rehabilitation	Affordable Housing	CDBG: \$ / HOME: \$	Other	Other	0	0		8	0	0.00%
Economic Development	Non-Housing Community Development	CDBG: \$	Facade treatment/business building rehabilitation	Business	0	0				
Economic Development	Non-Housing Community Development	CDBG: \$	Jobs created/retained	Jobs	400	336	84.00%	100	0	0.00%

Economic Development	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	960	571	59.48%	290	0	0.00%
Elimination of Slum and Blight	Non-Housing Community Development	CDBG: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	750	505	67.33%	150	0	0.00%
Elimination of Slum and Blight	Non-Housing Community Development	CDBG: \$	Other	Other	5000	0	0.00%			
General Public Services-CDBG	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0				
General Public Services-CDBG	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	207575	258968	124.76%			
General Public Services-CDBG	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		460	0	0.00%

General Public Services-CDBG	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	0				
General Public Services-CDBG	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Other	Other	200	626	313.00%			
Homebuyer Financial Assistance	Affordable Housing	HOME: \$	Homeowner Housing Added	Household Housing Unit	0	63		0	31	
Homebuyer Financial Assistance	Affordable Housing	HOME: \$	Direct Financial Assistance to Homebuyers	Households Assisted	150	66	44.00%	50	0	0.00%
Public Facilities and Infrastructure	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2000	14899	744.95%	4166	3045	73.09%
Public Facilities and Infrastructure	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	6	2	33.33%			
Public Facilities and Infrastructure	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	470				

Public Facilities and Infrastructure	Non-Housing Community Development	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	221				
Public Facilities and Infrastructure	Non-Housing Community Development	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	19				
Public Facilities and Infrastructure	Non-Housing Community Development	CDBG: \$	Other	Other	0	0				
Support for the Homeless	Affordable Housing Homeless Non-Homeless Special Needs	HOPWA: \$ / ESG: \$ / ESG-CV: \$ / HOPWA-CV: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	5900	18557	314.53%			
Support for the Homeless	Affordable Housing Homeless Non-Homeless Special Needs	HOPWA: \$ / ESG: \$ / ESG-CV: \$ / HOPWA-CV: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	2075	4198	202.31%	135	0	0.00%
Support for the Homeless	Affordable Housing Homeless Non-Homeless Special Needs	HOPWA: \$ / ESG: \$ / ESG-CV: \$ / HOPWA-CV: \$	Homeless Person Overnight Shelter	Persons Assisted	9290	11343	122.10%	117	0	0.00%
Support for the Homeless	Affordable Housing Homeless Non-Homeless Special Needs	HOPWA: \$ / ESG: \$ / ESG-CV: \$ / HOPWA-CV: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	645	0	0.00%			

Support for the Homeless	Affordable Housing Homeless Non-Homeless Special Needs	HOPWA: \$ / ESG: \$ / ESG-CV: \$ / HOPWA-CV: \$	Homelessness Prevention	Persons Assisted	2625	3400	129.52%	1430	0	0.00%
Support for the Homeless	Affordable Housing Homeless Non-Homeless Special Needs	HOPWA: \$ / ESG: \$ / ESG-CV: \$ / HOPWA-CV: \$	Housing for People with HIV/AIDS added	Household Housing Unit	1250	411	32.88%			
Support for the Homeless	Affordable Housing Homeless Non-Homeless Special Needs	HOPWA: \$ / ESG: \$ / ESG-CV: \$ / HOPWA-CV: \$	HIV/AIDS Housing Operations	Household Housing Unit	1750	396	22.63%	350	0	0.00%
Support for the Homeless	Affordable Housing Homeless Non-Homeless Special Needs	HOPWA: \$ / ESG: \$ / ESG-CV: \$ / HOPWA-CV: \$	Other	Other	0	2809		1200	0	0.00%

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

The City identified the creation and retention of affordable housing and the prevention and elimination of homelessness as the two high priority needs in the 2020-2024 Consolidated Plan. The City continues to prioritize funding in these areas. \$2,241,453.41 of 2024-2025 CDBG expenditures went to projects that contributed to the creation or retention of affordable housing. Of all federal funding sources reported here (CDBG, HOME, ESG, HOPWA) \$4,990,107.36 of expenditures went to affordable housing retention and creation, and \$1,666,791.43 went to the prevention and elimination of homelessness.

The City of Oklahoma City identified two (2) priority areas in the 2020-24 Consolidated Plan. These included the Strong Neighborhoods Initiative (SNI) neighborhoods and the Neighborhood Revitalization Strategy Area (NRSA). The City of Oklahoma City expended \$5,023,779.91 in CDBG funds, including general administration and planning, on activities and projects identified in the Plan. HOME funds of \$2,934,745.65, including administration, were expended on eligible activities. Aggregate spending within the NRSA represented 64% of all HOME and CDBG expenditures. Activities within the priority target areas included homebuyer down payment assistance, housing construction, housing rehabilitation, construction of public infrastructure, and the elimination of slum and blight.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).
91.520(a)

Race:	CDBG	HOME	HOPWA
White	20,577	32	159
Black or African American	18,053	24	77
Asian	250	0	0
American Indian or Alaskan Native	2,787	0	7
Hawaiian or Pacific islander	0	0	3
Total*	41,667	56	246
Ethnicity:			
Hispanic	2,888	14	46
Not Hispanic	40,164	42	175
Total	43,052	56	221

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Describe the clients assisted (including the racial and/or ethnicity of clients assisted with ESG)

Race:	Number of Clients:
American Indian, Alaska Native, or Indigenous	230
Asian or Asian American	16
Black, African American, or African	1,176
Hispanic/Latina/e/o	136
Middle Eastern or North African	4
Native Hawaiian or Pacific Islander	16
White	1,358
Multiracial	328
Client doesn't know	3
Client prefers not to answer/Data not collected	0
Total	3,267

Narrative

The Table 2 template does not include all the racial designations reported for CDBG, HOME, and HOPWA activities. As a result, individuals who were assisted with these funds are not included in the totals above. 20 HOPWA beneficiaries and 1,385 CDBG beneficiaries are missing from the totals above.

The CDBG and HOME numbers in the above table concerning racial status were manually entered based on information from the PR-23 Reports attached in Appendix 3. Please note that these numbers include a combination of households (for housing beneficiaries) and people (for non-housing services), as this is how the reports are structured. HOPWA and ESG information have been manually entered based on available data as presented in the SAGE ESG and HOPWA CAPER Reports. In addition, the data in the PR-23 reports may include racial and ethnic details for activities completed near the end of the 2024-2025

program year that were not entered as accomplishments until after the start of the FY 2025-26 Action Plan. This may result in a difference in IDIS accomplishments and the City's accomplishment numbers.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	\$8,140,279.14	\$5,023,779.91
HOME	public - federal	\$10,288,920.05	\$2,934,745.65
HOPWA	public - federal	\$1,721,305.61	\$1,232,969.63
ESG	public - federal	\$545,333.79	\$433,821.80

Table 3 - Resources Made Available

Narrative

All grant funds are intended to be disbursed timely. The unexpended end balance of the City's CDBG program at fiscal year-end was \$3,555,616.47 as reflected on the PR-26 Report (Appendix 3). When compared against the City's FY24 funding allocation of \$5,055,205 the CDBG expenditure ratio is within the 1.5 times annual allocation ratio required by HUD at 1.06. A financial summary reconciliation report is provided in Appendix 3. The City's actual expenditures, after completion of the June 2024 final draws, are consistent with the letter of credit. All financial expenditure records are maintained in the City's accounting system and are reflected in the HUD letter of credit disbursements balance. Total expenditures exceeding resources made available for FY 2024-2025 are attributable to funds carried forward from prior years and/or reallocation of program income.

The "Resources Made Available" column in the above table represents the available funding for each program. These funds are inclusive of formula grant funding, unallocated and anticipated program income, and funds carried forward for activities from prior years. The amount expended during the program year may vary from actual allocations due to the timing of project completions from prior years, and the unanticipated receipt of additional program income. All funds made available, and the amount expended for each activity have been detailed in the Final Expenditures and Accomplishments table (Appendix 2).

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
NEIGHBORHOOD STRATEGY AREA	80%	81%	Excludes Public Service Activities

Table 4 – Identify the geographic distribution and location of investments

Narrative

The City of Oklahoma City identified two (2) strategic target areas in the 2020-2024 Five Year Consolidated Plan. The Consolidated Plan provides for the continuation of the Neighborhood Revitalization Strategy Area (NRSA). The NRSA is a targeted area for investment of formula grant funds. NRSAs are disadvantaged areas with a high concentration of low- to moderate-income residents. Communities are offered enhanced flexibility in approved NRSA areas in undertaking economic development, housing, and public service activities with their CDBG funds. This flexibility is designed to promote innovative programs in

economically disadvantaged areas. The policies contained in the Consolidated Plan recommend, to the greatest extent possible, investment of 80% of CDBG funding to program activities in the NRSA. The City also focuses HOME funds in the NRSA.

The NRSA boundaries were established through an intensive citizen participation exercise undertaken to apply for designation by HUD as an Empowerment Zone/Enterprise Community. Three sub-strategy areas *located within the NRSA* have been further designated as focus areas for concentrated revitalization and reinvestment efforts under the Strong Neighborhoods Initiative (SNI). The current SNI Neighborhoods include Ross Heights, Stockyards, and MLK. Two SNI Neighborhoods graduated in the 2024-25 program year: Capitol Hill and Metro Park. The City often continues to expend funds in the SNI neighborhoods 1-2 years after they graduate to complete remaining projects. Exclusive of administration expenses, 64%% of federal CDBG and HOME funds were expended on projects and activities within the NRSA and SNI neighborhoods during the program year.

Leveraging

Explain how federal funds leveraged additional resources (private, state, and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

The City maximizes the investment of federal funds using both leverage and match. Federal funds provided by HUD are utilized in several ways to leverage public and private resources. CHDOs are encouraged to utilize private bank financing along with the CHDO loan pool of HOME funds in providing affordable housing. 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. CHDOs are the primary recipients of these lots.

The City's down payment and closing cost assistance program assists in the achievement of home ownership and has proven to be an attractive program that stimulates interest among private lenders. During the reporting period, the City leveraged its Down Payment Assistance program funds with *private* financial institution mortgage investments totaling \$3,126,959.27. For every dollar of downpayment assistance provided through the HOME program, the City leveraged \$7.42.

The ESG requirement for match contributions equal to the grant program funds was fulfilled with new funding and other resources as required by 42 USC 11375(a)(1), including cash resources, grants, and staff salaries, as well as in-kind contributions such as the value of a building or lease, donated materials, or volunteer time.

The sources of matching resources well exceeded the amount of the grant funds and included:

Local Government	\$0.00
State Government	\$0.00
Private Funds	\$356,571.00

Non Cash Match	\$45,000.00
Total	\$401,571.00

HOME Match

No HOME match waivers were received for the FY 2024-2025 program year.

For more information, please reference the attached HOME match report (Form HUD-40107-A) which is reflective of the correct match credit as reported (Appendix 6).

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	\$10,585,119.40
2. Match contributed during current Federal fiscal year	\$0.00
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$10,585,119.40
4. Match liability for current Federal fiscal year	\$381,007.21
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$10,204,112.19

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Date of Contribution		Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period

Balance on hand at beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
\$320,130.71	\$446,284.29	\$178,980.36	\$0.00	\$587,434.63

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period

	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Number	0	0	0	2	0	0
Dollar Amount	\$0.00	\$0.00	\$0.00	\$41,765.00	\$0.00	\$0.00
Sub-Contracts						
Number	8	0	0	0	0	8
Dollar Amount	\$1,690,612.46	\$0.00	\$0.00	\$0.00	\$0.00	\$1,690,612.46

	Total	Women Business Enterprises	Male
Contracts			
Number	0	0	0
Dollar Amount	\$0.00	\$0.00	\$0.00
Sub-Contracts			
Number	8	3	5
Dollar Amount	\$1,690,612.46	\$451,722.30	\$1,238,890.16

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted

	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	1	0	0	0	0	1
Dollar Amount	\$550,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$550,000.00

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition

Parcels Acquired	0	0
Businesses Displaced	0	0
Nonprofit Organizations Displaced	0	0
Households Temporarily Relocated, not Displaced	0	0

Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	0	48
Number of Special-Needs households to be provided affordable housing units	0	0
Total	0	48

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	53
Number of households supported through The Production of New Units	101	17
Number of households supported through Rehab of Existing Units	115	69
Number of households supported through Acquisition of Existing Units	50	31
Total	266	170

Table 12 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

The City made measurable progress in affordable housing activities, despite persistent challenges from rising construction costs, supply chain delays, and increased interest rates. These factors impacted project timelines and reduced buyer eligibility under the Down Payment Assistance Program.

Key activities completed during the program year included:

- **CDBG-funded:** 32 homes assisted through the Home Exterior Maintenance Program; 23 homes repaired via the Emergency Home Repair Program.
- **Public Housing:** 14 units rehabilitated.

HOME-funded: 13 CHDO units constructed and sold; 4 additional units underway. 44 affordable rental units, including 4 HOME-assisted units, were completed in this program year. 31 households received down payment/closing cost assistance.

Discuss how these outcomes will impact future annual action plans.

The City of Oklahoma City annually assesses its progress in meeting goals outlined in the 2020-2024 Consolidated Plan through the development of the Consolidated Annual Performance Evaluation Report (CAPER). The CAPER provides an opportunity for the City to evaluate the performance of its programs and services, and to determine whether adjustments to the current 5-year goals are needed. The City looks to ongoing performance and trends over time, to inform and calibrate future goals and outcomes. The City will continue to prioritize housing opportunities for low- to moderate-income families with 80% of available funding targeted within the NRSA.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	30	4
Low-income	20	9
Moderate-income	10	29
Total	60	42

Table 13 – Number of Households Served

Narrative Information

The data in Table 13 above may not be inclusive of all households served due to the timing of reporting in the HUD IDIS reporting system. Data has been assimilated from the CDBG and HOME PR-23 reports. Please note that the CDBG and HOME programs report income levels differently. The data in the CDBG fields reflects those between 0-30% AMI as Extremely Low, 30-50% as Low, and 50-80% as Moderate income. By contrast, data in the HOME fields reflect those between 0-30% as Extremely Low, 31-60% as Low, and 61-80% as Moderate income. The City did not assist any households with incomes above 80% AMI for either program.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

The Oklahoma City Continuum of Care and partnering agencies actively work to recruit landlords willing to house program recipients. The City recognizes that the prevention of homelessness is a more efficient and less costly mechanism of support than back-end services. As a result, the City has taken action to foster and maintain affordable housing by establishing programs and by providing funding to assist nonprofit and for-profit housing developers to rehabilitate and construct new affordable housing; supporting the City's Continuum of Care program by providing funding for the construction and rehabilitation of permanent supportive housing for the homeless when opportunity and resources allow; assisting the Oklahoma City Housing Authority by providing CDBG funds to modernize public housing units; providing funding to assist with the rehabilitation and construction of rental housing; and, providing funding for activities that support housing and services for persons with HIV/AIDS and homeless.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Oklahoma City used ESG funding in this Fiscal Year to address the emergency shelter and transitional housing needs of homeless persons. \$50,000 was spent on emergency shelter. In addition, \$161,315.31 was expended on rapid rehousing. The agencies provided emergency shelter and transitional housing to mentally ill persons, victims of elder abuse, youth, and victims of domestic violence. A total of 3,267 homeless individuals and families have been provided with services. The City also receives funding for homeless services from a variety of sources, and the numbers reported here reflect only the ESG funding.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The City of Oklahoma City, through the Continuum of Care with our partnering agencies, provides rental assistance, counseling, and legal assistance to assist families in retaining housing. Homelessness prevention activities are supported with CoC, ESG, and HOPWA funding, as well as social services grants.

The Continuum of Care Board (CCB) or Key To Home (K2H) Board represents a broad spectrum of the community including formerly homeless individuals, the business community, service providers, community volunteers, and the faith-based community. All K2H Partnership members commit to ending homelessness (including chronic homelessness) and are advocates in the community. Members of K2H also participate in the gathering of data for the gap analysis and provide input into the prioritization of needs. CoC agencies and organizations have historically worked collaboratively with other groups to successfully complete the Point-In-Time survey. The work of the K2H Board is not isolated to reviewing and writing each year's Continuum of Care application. The Oklahoma City CCB members actively participate year-round in several important committees/planning bodies whose work is important to the

implementation and development of the Continuum of Care. The K2H Board also determines the annual rating measures for Continuum of Care, Social Services, HOPWA, and ESG grantees.

The WestTown Resource Center and Homeless Day Shelter are owned and operated by The Homeless Alliance and have had a significant impact on the community's efforts to reduce homelessness. Both facilities were identified as a critical need in the 10-Year Plan and are serving several hundred people daily, including several neighborhood (non-homeless) residents seeking access to benefits and meals. 2-1-1 has served as the centralized intake contact for ESG, Continuum of Care, and other homeless housing programs. It is currently the community resource for the initial evaluation of social service needs including emergency situations. The 2-1-1 system, however, has been severely threatened by the State of Oklahoma budget cuts in recent years.

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 of Oklahoma City serves as the lead agency for the Key to Home Partnership, which is the City's Continuum of Care Board (CCB). The Key to Home Partnership's goal is to educate our 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 Oklahoma City. 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 the Department of Housing and Urban Development to allocate federal funds across the partnership to support programs that provide shelter, housing, and supportive services to people experiencing homelessness in OKC. The Planning Department serves as a permanent member of the Continuum of Care Board (CCB), provides technical support to Continuum of Care funded agencies, writes the consolidated application, and serves on the Interagency Council on Homelessness.

Key to Home's goal is 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 our strategy, and educating the public on homelessness and its solutions.

The Oklahoma City Continuum of Care (CoC, Key to Home) utilizes a coordinated entry and assessment system for all clients served by the homeless services system. When a person who is homeless contacts a homeless services provider or accesses the 2-1-1 system, an assessment is conducted which includes identifying health concerns, length of time on the street, and other relevant information to determine where they will be placed on the CoC's priority list for housing. A Coordinated Case Management team meets weekly to review cases on the list and determine who will provide adequate housing and services based on a client's needs. Once determined, a case manager is assigned, the client is located and moved into the first available unit and supportive services are provided. The Oklahoma City Continuum of Care has placed over 1,000 chronically homeless individuals and veterans into housing in the last 5 years and maintains a retention rate between 80-90%.

The Key to Home Partnership also aims to decrease unsheltered homelessness in Oklahoma City through its Encampment Rehousing Initiative. The City of Oklahoma City has recently seen a growing number of individuals experiencing unsheltered homelessness. This means more people have been homeless for a

year or longer or have been homeless multiple times in the last several years. Unsheltered homeless individuals are typically the hardest to serve, most visible, and most costly to the community due to reactive measures such as litter abatement, emergency response, and court costs. The Key to Home Partnership adopted a plan to rehouse 500 unsheltered homeless individuals in Oklahoma City in two years (by 2025) through the Encampment Rehousing Initiative. Through this initiative, program partners collaborate to house encampment residents in an expedited 4-6 weeks and provide ongoing case management support for 12 months.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

The City allocates CDBG funds for the rehabilitation of low-income public housing units. During the program year, the Oklahoma City Housing Authority (OCHA) rehabilitated fourteen (14) public housing units with \$235,000 in CDBG funds.

The City of Oklahoma City Planning Department staff, as part of its outreach activities in the SNI neighborhoods, participates in the presentation of Fair Housing and legal education workshops which include discussion of homeownership opportunities and landlord/tenant issues. OCHA staff conducts periodic seminars which include Homebuyer Education Classes to increase awareness about housing programs among participants in the Oklahoma City Housing Authority's Family Self Sufficiency Program, Section 8 Homeownership Program, and Individual Development Accounts Program as well as with other nonprofit organizations. Information packets are provided to attendees that contain brochures and flyers of various home ownership services.

The Housing Authority has established resident involvement programs that include resident councils and family self-sufficiency programs. OCHA also has programs in both the public housing and Section 8 programs to assist residents in becoming homeowners.

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

OCHA encourages upward mobility for all Section 8 and Public Housing families. Tenants are encouraged to participate in the Family Self-Sufficiency Program (FSS), a voluntary program for Section 8 residents that assist families in improving their economic situation and reducing their dependency on public assistance. The FSS is designed for those who are unemployed or underemployed. Each participant creates a five (5) year plan that includes employment goals and identifies training and/or educational needs. FSS staff assist participating households in identifying, locating, and arranging for the services they need to accomplish their goals. Services may include childcare, education, transportation, personal development, resumes, job training and/or placement. As FSS participants succeed in raising their family income, the portion of their monthly income contributed toward their Section 8 rent payment also increases. HUD regulations allow a percentage of this rent increase to be deposited into an interest-bearing account for the participating family. When a family achieves its goals and "graduates" from welfare assistance for a minimum period of twelve (12) months, they are awarded the accumulated funds in their FSS account. These funds may be used to make a down payment on a home purchase, or to start a new business.

OCHA also operates a Section 8 Homeownership Program to assist eligible tenants in the purchase of a home by offering monthly homeownership assistance towards monthly payments. Participating families should demonstrate satisfactory rental history, minimum income requirements, and steady employment. All applicants must pass a preliminary credit screening process and complete a homebuyers education course.

OCHA continually seeks opportunities to address capital needs and improvements using HUD's Rental Assistance Demonstration program. OCHA is committed to preserving and improving public housing properties and pursues grant and financing opportunities to improve properties and strengthen the quality of life and services for tenants.

Actions taken to provide assistance to troubled PHAs

The Oklahoma City Housing Authority is designated as a high performer and is not identified as a troubled PHA; therefore, no assistance was required.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken 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. 91.220 (j); 91.320 (i)

Some of the barriers affecting the cost of providing affordable housing relate to policies or codes of the jurisdiction. In recent years, the City has taken steps to establish policies that are favorable to the production of affordable housing. The actions included:

- Adoption of the International Existing Building Code – Code applies to multi-family housing and reduces financial barriers to renovating existing building by allowing greater flexibility in materials used in the renovation.
- The City does not require engineering or architectural seals for developers to construct single-family housing.
- The City contracted with Root Policy Research to update its Analysis to Impediments to Fair Housing Choice. The update was completed January 31, 2020, and is included in the City's 2020-2024 Consolidated Plan. This study included suggestions for code revisions in support of affordable housing. The City is currently engaged in a comprehensive code review and rewrite. Much of the focus of the code update is revising base zones to allow for more density and housing. One action taken as part of the code update is a new ordinance allowing Accessory Dwelling Units (ADUs) by right in the urban core.
- The City provided CDBG funds for Economic & Planning Systems, Inc. to perform a Comprehensive Housing Affordability Study (HAS) for Oklahoma City, to identify recommendations to increase the quality and quantity of affordable housing in our community. That study and the accompanying recommendations were completed in Fall 2021.
- As a result of the HAS, the City developed a Housing Affordability Implementation Plan (HAIP), to focus on the need for affordable housing development and preservation. The HAIP was completed in 2025, and the City's first Housing Strategy Implementation Manager was hired shortly thereafter. The Housing Manager will coordinate the City's public and private housing activities.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

Worst-case housing needs are addressed through programs that include funding for nonprofit housing providers, and Affordable Housing Development Programs and Rental Housing programs as outlined in the Consolidated Plan. In addition, the City, in all affordable housing development solicitations, gives priority to projects that serve special populations and people with disabilities. The Oklahoma City Continuum of Care, the Oklahoma City Housing Authority, and the City's Supportive Services for Veteran's Families (SSVF) provider are working together to actively recruit landlords to house homeless veterans. Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

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

All City housing rehabilitation inspectors are certified by the Oklahoma State Department of Environmental Quality as lead-based paint Inspectors/Risk Assessor and/or Supervisor and certified by the U.S. Environmental Protection Agency as Renovator/Remodeler. All properties, where Federal funds are granted or loaned by the City for housing rehabilitation, are inspected for lead based paint. The inspection includes a specific section for determining what remediation steps need to occur to clear the property. Work specifications are prepared, and the remediation work is included in the rehabilitation bids from State Certified contractors.

The City completed thirty-two (32) exterior maintenance projects, and twenty-three (23) emergency home repair projects in the 2024-2025 Action Plan Year. Emergency home repair is a program activity conducted for the City by a sub-grantee capable of performing lead-based paint responsibilities. Additionally, sub-grantees, nonprofit borrowers, CHDOs, and other funding recipients carry out lead-based paint responsibilities directly or through the City's certified inspectors.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

The City's antipoverty strategy includes increasing employment opportunities, providing housing opportunities for low and moderate-income people, and providing supportive services and housing assistance to homeless people and families through public investment of local and federal resources.

The City is utilizing CDBG and Section 108 Loan Guarantee funds to stimulate the local economy and create jobs. In the past years, the City invested Section 108 and Economic Development Initiative grant funds in the redevelopment of the historic Skirvin Hotel, the American Indian Cultural Center, Dell, Inc. Business Service Center, the Embassy Suites Hotel, the 21C Museum Hotel, the First National Bank restoration, and to establish a small business assistance revolving loan fund. All projects were in the Neighborhood Revitalization Strategy Area. The job creation programs have been responsible for the creation of approximately 2,200 jobs available to lower-income persons. All jobs qualify for the presumption of low- and moderate-income.

Concerning public education and other locally funded programs that address poverty in Oklahoma City, the City utilized CDBG SNI funds to fund after-school and summer programming at five schools. They are Capitol Hill Middle School and Lee Elementary which serve the Capitol Hill Neighborhood, and Martin Luther King, Jr. Elementary, FD Moon Middle School, and Thelma Parks Elementary which serve students in the Capitol View and Metro Park Neighborhoods. The summer school programs adapted the nationwide Science Technology Engineering and Math (STEM) program into STEAM by incorporating a focus on Art education.

Public education and job creation activities coupled with the construction of affordable and market-rate housing provide opportunities for individuals and families to move from poverty to higher levels of security and prosperity. In addition, new housing development is providing employment opportunities at good wages to low/mod income persons and minorities in various construction trades.

Finally, the City is addressing homelessness through continued support of the WestTown Housing Resource Center and Homeless Day Shelter Campus. This combined public facility provides a one-stop location for people experiencing homelessness and those at risk of becoming homeless to obtain needed assistance. The City supports the center through an annual Agreement to fund operational expenses from the City's General Fund.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

The City has an ongoing institutional structure for the provision of housing assistance to lower-income people and special populations. The Oklahoma City Housing Authority, Community Housing Development Organizations, and nonprofit and for-profit housing organizations. A brief list of activities that were funded in the 2024-2025 Action Year Plan includes:

- Oklahoma City Housing Authority rehabilitated fourteen (14) public housing units with \$235,000 in CDBG funds.
- Community Action Agency received \$600,000 in CDBG funds to conduct emergency home repairs to assist lower-income people. 23 emergency home repairs were completed.
- Community Action Agency and Neighborhood Housing Services provided down payment and closing cost assistance to prospective lower-income homeowners utilizing HOME grant funding. A total of six (31) down payment and closing cost assistance transactions were completed.
- Neighborhood Housing Services CHDO completed construction of one single family home.
- Jefferson Park CHDO provided housing opportunities for lower-income people through new construction Of six (6) homes.
- Oklahoma City Housing Services Redevelopment Corporation CHDO (d/b/a Positively Paseo) provided housing opportunities for lower-income people through new construction of six (6) homes.
- Forty (40) senior apartment units (Hillcrest Green) supported with \$550,000 in HOME funds were completed.

The City will continue to enhance institutional structures by making local and federal resources available to agencies to address homelessness, the provision of social services, affordable housing, and economic development.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The City allocates CDBG funds for the rehabilitation of low-income public housing units. During the program year, the Oklahoma City Housing Authority (OCHA) rehabilitated fourteen (14) public housing units with \$235,000 in CDBG funds. Additionally, OCHA and City staff meet periodically to discuss local affordable housing needs and issues, as well as opportunity areas for future housing development.

The Oklahoma City Housing Authority has established resident involvement programs that include resident councils and family self-sufficiency programs. The Housing Authority also has programs in both the public housing and Section 8 programs to assist residents in becoming homeowners.

The City recently hired a Housing Strategy Implementation Manager to better coordinate housing activities between private and public housing providers and social service agencies. The Housing Manager is working to develop a coordinated strategy for new housing in Oklahoma City, including the expenditure of \$50 million in city bond funding for affordable housing.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

The City is committed to affirmatively furthering fair housing, and contracts annually with the Metropolitan Fair Housing Council to monitor and investigate housing discrimination complaints. During the 2024-2025 reporting period, the Metropolitan Fair Housing Council received 417 landlord/tenant

intakes that resulted in the filing of thirty eight (38) formal housing discrimination complaints. In addition, MHFC collected \$400 in the Fifth Action Plan Year for complainants through in-house mediation.

Metropolitan Fair Housing also processed twenty-nine (29) requests for reasonable accommodation or modification. In addition, the Metro Fair Housing Council conducted twenty-four (24) training events for first-time homebuyers, public and private housing providers, and faith-based housing providers. These activities speak directly to improving the understanding of and compliance with the Fair Housing law.

In addition to the Metropolitan Fair Housing activities, a resources directory is made available on the SNI Facebook page, and staff continue working with neighborhood groups to provide Fair Housing Education and outreach.

A new Analysis of Impediments to Fair Housing Choice was completed for The City of Oklahoma City by Root Policy Research in January 2020 and used to inform the 2020-24 Five Year Consolidated Plan period beginning on July 1, 2020. A new study on affordable housing needs in our community was completed in the Fall of 2021.

Several activities supported during the reporting period speak directly to improving, understanding and enhancing compliance with fair housing law. These important activities will continue in the upcoming year.

The City is fully committed to affirmatively furthering fair housing. Efforts to promote equitable housing opportunity during the 2024-25 year included the following activities:

- Provided landlord-tenant education to SNI neighborhoods
- Shared information about Fair Housing and Discrimination on the SNI Facebook page.
- Evaluating the *Housing Affordability Study* completed by EPS, Inc. to identify demands, trends and habitability issues in our community to be considered in future funding decisions.

Other identified impediments are being addressed by other parts of the City, outside this Action Plan. Zoning is beginning to be addressed. The City engaged a consulting firm to diagnose problems with the existing zoning code and review it for conformance with the City's comprehensive plan. The process of overhauling the code began in late 2018 and early parts of the code update are being considered by the City Council. This process will also examine recommendations for code changes that were identified in the City's Housing Affordability Study intended to support the development of affordable housing. Additionally, the City contracted with a firm to create a Housing Affordability Implementation Plan (HAIP).

CR-40 - Monitoring 91.220 and 91.230

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

Oklahoma City monitors all activities funded with federal grants and a compliance review is conducted for all sub-recipients on an annual basis. The City is monitored by HUD and undertakes an annual A-133 independent audit. The internal audit found no material weaknesses or significant deficiencies in financial statements or federal awards. The 2022-23 A-133 Single Audit Report for the City reported no findings for internal controls over major federal programs. The A-133 single audit for the City's fiscal year 2024-2025 is not complete at the time of this report. All identified findings from the previous year's audits have been addressed and completed.

Monitoring of subgrantees is performed for each activity to ensure compliance with the requirements of the program.

1. Desk monitoring is performed throughout the program year. Each reimbursement request is reviewed for eligibility, documentation support, and eligibility of expenditures. Beneficiary reports are required per the terms of each agreement throughout the period of reimbursement.
2. Spending levels are monitored throughout the grant year to ensure that funds are expended timely, and the year-end goals are met.
3. On-site monitoring is regularly performed on subgrantee contracts as prioritized by risk. Areas reviewed include conformance to the subgrantee agreement; record retention system; financial management systems, evidence of insurance, adequate procurement, and compliance with all federal cross-cutting requirements.

The Housing and Community Development Division of the Oklahoma City Planning Department is responsible for the development and implementation of the Consolidated Plan. The Planning Department ensures compliance with program and Consolidated Plan requirements through oversight activities of the Citizen's Committee for Community Development which holds public meetings to discuss the Consolidated Plan, Annual Action Plans, and the program accomplishments. Programs are additionally subject to internal accounting and auditing procedures, as well as annual external auditing and HUD monitoring.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The Citizens Committee for Community Development (CCCD) was formally created by the City Council to provide a forum for citizen involvement concerning community development issues. Specifically, the Citizen's Committee reviews CDBG proposals and changes in CDBG program activities regarding the Consolidated Plan and makes funding recommendations to the City Council. These meetings are open to the public. In compliance with the City's Citizen Participation Plan, the final year-end expenditures, financial statements, and CAPER accomplishments with beneficiary data were provided to the CCCD for the Committee's review and public comment on November 18, 2025. The public meeting notice was posted on the City's website and published in *The Journal Record* on October 16, 2025. Citizens were given

a thirty (30) day comment period in which to submit comments to staff. Accommodations were made for disabled citizens.

No comments were received at the CCCD meeting to review the CAPER. Documentation of the CCCD meeting and the notice published in *The Journal Record* are attached in the Appendix.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

In the FY24 Action Plan, the City prioritized activities that met the primary national objective: a benefit to low- and moderate-income populations (LMI). 79% of the City's CDBG expenditures, excluding admin and planning, met an LMI national objective. The City also labeled the creation and preservation of affordable housing as a high need. 53% of CDBG expenditures, excluding admin and planning, went to housing.

The Tables in Appendix 2 detail expenditures and achievements based on the City's financial records for the 2024-2025 program year. The City conducted one Substantial Amendment in FY 2045-25, reallocating unspecified funds to SNI Sidewalks, Walnut Development Infrastructure for affordable housing, and an in-house emergency repair program. One of the primary reasons for the amendment was to allow for continued spending on projects planned for the 25-26 fiscal year, despite potential appropriations delays.

The City's objectives continue to be to serve low and moderate income households, primarily through housing and neighborhood revitalization.

The City monitors the expenditure of CDBG funds throughout the year to ensure that activities are completed on time. In instances where funds are not fully expended, the carryover balance is reallocated to the subrecipients for expenditure in the following Action Plan or recaptured as needed.

The City continues to make progress toward achieving the national and local goals of the CDBG program. Like many communities, rising construction costs, declining public funds, and increased regulatory requirements limit the ability of the City to fully realize project goals, particularly those related to affordable housing development. The City will continue to look for ways to maximize investments in developing and preserving affordable housing, through leverage, cost maximization, and innovative partnerships.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No.

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

Not Applicable

CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations.

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

A summary of on-site inspections and required remediation is provided in Appendix 8. All HOME rental projects subject to an affordability period were desk-monitored during the program year. There are currently twenty-one (21) projects under an affordability period, consisting of 225 total units. A 20% sampling of units is scheduled for inspection at each of the multi-family and SRO properties subject to an on-site compliance review. All projects were inspected according to the sampling rules in 2024. For small projects, all units were inspected. Following the completion of all inspections, property managers are notified of unit deficiencies, and follow-up inspections are made where necessary. Repairs to address noted deficiencies are required and monitored by staff until completed. All projects, as of June 30, 2025, complied with minimum property standards.

All 225 HOME-assisted units were desk monitored. This included the review of standard lease agreements, qualifying income reports, current rent limits, verification of occupancy status, and management reports. Of the projects surveyed, all but two responded appropriately with no significant findings. Staff continue to follow up on delinquent documentation. Additional findings, if applicable, will be reported in the FY 2025-26 Action Plan.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

As a recipient of federal funds, the City of Oklahoma City must adopt affirmative marketing procedures and requirements for rental and homebuyer projects containing five (5) or more HOME-assisted units. Affirmative marketing includes actions that provide information and/or otherwise attract eligible people to an assisted project without regard to race, color, national origin, gender, religious affiliation, familial status, or disability. In marketing its programs, The City aims to ensure that eligible households have acceptable access and the opportunity to participate in all programs and services supported by federal grant funds. In Fiscal Year 2024-2025, homebuyer down payment assistance programs, first-time homebuyer education, and related services were marketed to residents in low- to moderate-income neighborhoods and those with limited English proficiency.

Affirmative marketing provisions were contained in all rehabilitation housing assistance information packets and were included in all agreements that provided financial assistance to rental housing programs. DPA program brochures were provided to all Community Action Agency (CAA) Head Start Program participants. Program information was given to prospective homebuyers during CAA's weekly Homebuyer Education classes and Neighborhood Housing Service's Homebuyer Education classes held twice a month throughout the year. Affordable Housing Programs were also highlighted in numerous monthly Neighborhood Association newsletters, and on The City's [Community Development website](#). Increased emphasis was placed on Section 3 requirements, which were included in all operating and development agreements.

Data on the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

In the 2024-2025 program year, The City of Oklahoma City received CDBG program income in the amount of \$210,616.42. This revenue was recognized and has been allocated to eligible activities in the FY 2025-26 Action Plan. These funds were primarily received through repayments on Section 108 loans. The HOME program recognized program income in the amount of \$320,047.41. These funds have been reprogrammed to eligible activities in the FY 2025-26 Action Plan.

Other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

The City commissioned and received a Housing Affordability Implementation Plan in early 2025. As part of this plan, the City is working towards zoning reform, rehabilitation programs, and rental programs that preserve naturally occurring affordable housing, and potentially programs that preserve affordable units with expiring affordability periods. The City is working to implement the actions identified in the HAIP to better promote and preserve affordable housing in the City.

CR-55 - HOPWA 91.520(e)

Identify the number of individuals assisted and the types of assistance provided

Table for report on the one-year goals for the number of households provided housing through the use of HOPWA activities for: short-term rent, mortgage, and utility assistance payments to prevent homelessness of the individual or family; tenant-based rental assistance; and units provided in housing facilities developed, leased, or operated with HOPWA funds.

Number of Households Served Through:	One-Year Goal	Actual
Short-term rent, mortgage, and utility assistance payments	170	49
Tenant-based rental assistance	80	53
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0	31
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	25	0
Total:	275	133

Table 14 – HOPWA Number of Households Served

Narrative

The City of Oklahoma City is the recipient of Housing Opportunities for Persons with AIDS (HOPWA) funds. The City of Oklahoma City administers the grant and signed a contract with The Homeless Alliance, Inc. as the project sponsor to provide services with the funds. The OKC HOPWA service area includes 7 (seven) counties: Oklahoma, Cleveland, Canadian, Grady, Lincoln, Logan, and McClain. The Homeless Alliance and its subrecipients are members of the Oklahoma City Homeless Continuum of Care (CoC). The collaboration of HIV and non-HIV service providers has created a holistic module of care. The OKC HOPWA Program does not have a waiting list.

The HOPWA program allocates funds to meet the housing needs of people with HIV/AIDS, including lease/rental assistance, shared housing arrangements, apartments, and community residences. Supportive services including case management are also included in the program. HOPWA funds can also be used for emergency housing, temporary rent, mortgage, and utility payments to transition eligible people into more permanent housing arrangements. A total of 336 clients were assisted with HOPWA funds. Other assistance provided with HOPWA funds in FY 2024-2025 includes:

- 53 households provided Tenant-Based Rental Assistance
- 49 households provided Short Term Rent Mortgage and Utility Assistance
- 31 households provided Permanent Housing Placements
- 60 households provided housing information services
- 143 households provided supportive services

Please note that some households noted above received more than one service.

Coordination and leverage of services is the key to success for many of our HOPWA clients. Some examples of leveraged services in our system of care include:

- Street homeless outreach services have improved with a team of HIV and Homeless services providers working collaboratively to identify newly infected persons and guiding those living on the street to housing and care services.
- The Homeless Alliance provides funding for the AIDS Legal Resources Project. This program works closely with the HOPWA program to assist with legal issues that directly affect the client's ability to obtain and maintain housing.
- For clients who are identified as "out of care," the HOPWA case manager makes an appointment for necessary treatment and an appointment with the Ryan White Outreach case manager.
- The Homeless Alliance contracts with a local provider, Urban Housing Locator, to connect public and private housing providers, develop a resources list, perform inspections, and build relationships with landlords. This has proven beneficial in placing clients in more affordable units and encouraging landlords to accept harder-to-place clients who have felonies or past evictions.
- The Homeless Alliance uses volunteers to provide support services to HIV clients. This program includes volunteers helping HOPWA clients move into housing, taking clients to appointments, and other day-to-day activities.
- The Homeless Alliance provides some support to the Winds House, a transitional housing program for fifteen (15) clients.

Using the services of Urban Housing Locator, a pool of FMV housing (all-bills-paid) apartments has been located which provides individuals a broader choice of affordable locations. Locating units that will accept felons has allowed HOPWA Case Managers the ability to house hard-to-place clients. The HOPWA project made great progress in moving individuals from TBRA into affordable independent housing. Housing inspections ensure all units meet HUD's habitability standards.

The Homeless Alliance continued to make improvements to the program in the 2024-2025 program year to better accommodate the need for services and increase the capacity to serve the HIV community. These improvements include serving more unique households, partnering with new and existing agencies, building a positive relationship with the OU School of Social Work, and training interns. The HOPWA Program, Healthy Housing, remains in a larger space in Shepherd Mall to accommodate the growing team, thus increasing capacity for services. The HOPWA program continued to provide ongoing case management services and funding from STRMU, TBRA, PHP, and Emergency Housing as needed to meet clients facing homelessness or housing instability. This year the Homeless Alliance integrated the HOPWA program into the CoC's Coordinated Entry System to allow clients better access to other funding and housing opportunities. This also allows for more equitability of services and better prioritization of clients' needs.

With the shift from COVID funding to Key to Home funding, our community experienced a transition in agency roles, leading to a period of growth and change as teams adapted to new opportunities. The Project Sponsor took that as an opportunity to further incorporate HOPWA into the coordinated entry

system. Additional challenges include stigma and a lack of affordable housing units in service area. The entire HOPWA CAPER is included as an appendix to this report.

CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	4	8	0	0	0
Total Labor Hours	8,062	23,222			
Total Section 3 Worker Hours	5,719	15,170			
Total Targeted Section 3 Worker Hours	505	3,044			

Table 15 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	0	2			
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	0	2			
Direct, on-the job training (including apprenticeships).	0	1			
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	0	1			
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	0	1			
Outreach efforts to identify and secure bids from Section 3 business concerns.	00	2			
Technical assistance to help Section 3 business concerns understand and bid on contracts.	0	0			
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	0	0			
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	0	0			
Held one or more job fairs.	0	0			
Provided or connected residents with supportive services that can provide direct services or referrals.	0	1			
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.	0	1			
Assisted residents with finding child care.	0	0			
Assisted residents to apply for, or attend community college or a four-year educational institution.	0	0			
Assisted residents to apply for or attend vocational/technical training.	0	0			
Assisted residents to obtain financial literacy training and/or coaching.	0	1			
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	0	0			

Provided or connected residents with training on computer use or online technologies.	0	0			
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	2	0			
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0	0			
Other.	0	0			

Table 16– Qualitative Efforts - Number of Activities by Program

Narrative

The City continues to meet the safe harbor thresholds for Section 3 workers and targeted Section 3 workers. A summary of Section 3 projects is attached in Appendix 7.

CR-60 - ESG 91.520(g) (ESG Recipients only)

ESG Supplement to the CAPER in e-snaps

For Paperwork Reduction Act

1. Recipient Information—All Recipients Complete

Basic Grant Information

Recipient Name	OKLAHOMA CITY
Organizational DUNS Number	014104777
UEI	
EIN/TIN Number	736005359
Identify the Field Office	OKLAHOMA CITY
Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance	Oklahoma City CoC

ESG Contact Name

Prefix	Mr
First Name	Ben
Middle Name	
Last Name	Davis
Suffix	
Title	Principal Planner

ESG Contact Address

Street Address 1	420 West Main
Street Address 2	Suite 920
City	Oklahoma City
State	OK
ZIP Code	-
Phone Number	4052971602
Extension	
Fax Number	
Email Address	benjamin.davis@okc.gov

ESG Secondary Contact

Prefix	Mr
First Name	Jerod
Last Name	Shadid
Suffix	
Title	Program Planner
Phone Number	4052973608
Extension	
Email Address	jerod.shadid@okc.gov

2. Reporting Period—All Recipients Complete

Program Year Start Date 07/01/2024
Program Year End Date 06/30/2025

3a. Subrecipient Form – Complete one form for each subrecipient

Subrecipient or Contractor Name: Positive Tomorrows City: Oklahoma City State: OK Zip Code: 73107, 6425 DUNS Number: 008072469 UEI: Is subrecipient a victim services provider: N Subrecipient Organization Type: Other Non-Profit Organization ESG Subgrant or Contract Award Amount: 25000
Subrecipient or Contractor Name: The Homeless Alliance City: Oklahoma City State: OK Zip Code: 73106, 2609 DUNS Number: 189040509 UEI: Is subrecipient a victim services provider: N Subrecipient Organization Type: Other Non-Profit Organization ESG Subgrant or Contract Award Amount: 257239
Subrecipient or Contractor Name: Upwards Transitions City: Oklahoma City State: OK Zip Code: 73106, 7847 DUNS Number: 052487717 UEI: Is subrecipient a victim services provider: N Subrecipient Organization Type: Other Non-Profit Organization ESG Subgrant or Contract Award Amount: 25000

Subrecipient or Contractor Name: City Rescue Mission City: Oklahoma City State: OK Zip Code: 73106, 7807 DUNS Number: 169915675 UEI: Is subrecipient a victim services provider: N Subrecipient Organization Type: Faith-Based Organization ESG Subgrant or Contract Award Amount: 52093
Subrecipient or Contractor Name: Community Health Centers City: Spencer State: OK Zip Code: 73084, 9167 DUNS Number: 808772073 UEI: Is subrecipient a victim services provider: N Subrecipient Organization Type: Other Non-Profit Organization ESG Subgrant or Contract Award Amount: 20000
Subrecipient or Contractor Name: Mental Health Association Oklahoma City: Tulsa State: OK Zip Code: 77119, 5234 DUNS Number: UEI: Is subrecipient a victim services provider: N Subrecipient Organization Type: Other Non-Profit Organization ESG Subgrant or Contract Award Amount: 74239
Subrecipient or Contractor Name: SISU Youth City: Oklahoma City State: OK Zip Code: 73112, 7931 DUNS Number: 079753978 UEI: Is subrecipient a victim services provider: N Subrecipient Organization Type: Other Non-Profit Organization ESG Subgrant or Contract Award Amount: 20000

Subrecipient or Contractor Name: City Care City: Oklahoma City State: OK Zip Code: 73102, DUNS Number: 037519480 UEI: Is subrecipient a victim services provider: N Subrecipient Organization Type: Other Non-Profit Organization ESG Subgrant or Contract Award Amount: 30000
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NOTE: Guidance received from the U.S. Department of Housing and Urban Development has advised that the CR-65, CR-70, and CR-75 Screens are no longer applicable. All accomplishment and expenditure data for ESG funding appears in the attached SAGE Report (Appendix 5). The sections cannot be removed from the IDIS template but are minimized in the published report.

CR-65 - Persons Assisted

CR-70 - Assistance Provided and Outcomes

CR-75 - Expenditures