

Housing Affordability Implementation Plan

City of Oklahoma City

January 14, 2025



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Executive Summary

Welcome to the Housing Affordability Implementation Plan

Building on recommendations from the City's 2021 Housing Affordability Study, the City's Housing Affordability Implementation Plan (HAIP) is the springboard for tackling housing affordability challenges in our city. The guidance and sequence of actions in the HAIP are designed to be tailored to emerging opportunities and evolving needs in our city's housing environment.

In developing this plan, numerous conversations took place among industry stakeholders and partners in our community. These conversations communicated the shared values that serve as the basis for this plan, and these values are detailed in the Introduction chapter that follows. A recurring theme throughout conversations was the desire for ongoing collaboration to effectively coordinate and leverage our community's existing and future resources. This theme reflects a shared confidence in the relationships and structures that have been built within the existing network and a willingness to examine how we can work better together to make a positive impact to mitigate known and emerging housing challenges.

What is the HAIP?

The Housing Affordability Implementation Plan (HAIP) outlines an action plan of strategies that leverage partnerships and resources and guide the City staff and its partners in developing the policies and programs that will address the evolving needs for affordable housing options in Oklahoma City. The Plan also articulates objectives, identifies priorities and funding sources, defines partner roles and responsibilities, and provides a timeline for implementation based on technical, financial, and policy feasibility.

The Plan is the culmination of multiple case studies, housing data analyses, and subject matter expertise gathered over several years.

The goals and actions presented in this plan are designed to support this 5-point strategy developed in the HAS:

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.

Why the HAIP is Important

The Plan provides its users and the community at large with clarity and focus, as well as transparency and accountability for how housing strategies will be carried out. It documents current values, conditions and assumptions – a current state of affairs from which we can observe change and manage for the best outcomes. The Plan lays the groundwork for setting metrics and indicators to track desired outcomes and measure whether and how much our efforts are making a difference.

How to Use the HAIP

The HAIP is arranged into 3 stages that provide a flexible sequence of actions (illustrated below in **Table 1**) so the City and its partners can respond to emerging needs and opportunities. The stages are not intended to be dependent on a rigid sequence; they are organized by theme and within each theme is guidance and strategy to assist with decisions and priorities.

- **Stage 1 – Establishing Visibility, Initializing Priorities for Staffing, Investment and Partnerships:** This includes communication and public accountability, staffing and coordinated housing functions across partner organizations.
- **Stage 2 – Policy and Program Development:** This includes improving landlord-tenant relations, alignment with strategies to address homelessness, zoning code modifications and development review processes, public land development, expanding existing programs, and establishing new programs.
- **Stage 3 – Program Evolution:** This includes refining programs and policies, revisiting partner roles and responsibilities, and the evolution of staff resources.
- **Appendix:** The sections of the appendix serve as a resource library to support decision-making and provide examples of housing policy and program experiences in other cities.

TABLE 1: IMPLEMENTATION PLAN ORGANIZATION

Theme	Topics
Stage 1: Establishing Visibility, Initializing Priorities for Staffing, Investment and Partnerships	
Public accountability and communications plan	<ul style="list-style-type: none">▪ Adopt Clear Definitions for Affordable Housing (p. 28)▪ Define Housing Production, Preservation, and Rehabilitation Metrics (p. 29)▪ Define Achievable 10- or 15-Year Goals (p. 30)▪ Develop a Communications Plan (p. 32)▪ Establish Web Presence for Tracking Progress and Outcomes (p. 32)▪ Create Advisory Group (p. 33)
Staffing and coordinated housing functions across the Planning Department	<ul style="list-style-type: none">▪ Secure Funding Source for PHP (p. 34)▪ Define the PHP Roles and Responsibilities (p. 34)▪ Obtain Approvals for PHP, Advertise and Recruit (p. 36)

Theme	Topics
	<ul style="list-style-type: none"> Review Planning Department and Division Sections and Functions (p. 36) Create a Working Version of Possible Future Organizational Structures (p. 37)
Local Investment	<ul style="list-style-type: none"> Define Key Objectives for Local Investment (p. 38) Define Priority Uses and Limitations (p. 38) Review and Amend the City's Strategic Investment Policy (SIP) and GOLT Policy to Reflect HAIP Goals/Priorities (p. 41) Define Priorities for Use of Public Land (p. 41)
Partnerships	<ul style="list-style-type: none"> Assess Existing Partner Capacity, Needs and Gaps (p. 43) Assess Emerging and Existing Partner Capacity, Needs and Gaps (p. 43) Explore Non-Traditional Partner Opportunities (p. 46) Identify System-Wide Capacity, Skills, and Resource Gaps (p. 48) Defining a Potential National Partner's Role (p. 48) Funding Options for National Partner (p. 49)
Stage 2: Policy and Program Development	
Development Process Efficiency	<ul style="list-style-type: none"> Assess and Refine Development Review and Permitting Processes (p. 52) Review Key Content Requirements (p. 53) Review and Align Processes and Timing (p. 54) Review and Refine Key Evaluation Criteria (p. 54)
Existing Program Evaluation and Expansion	<ul style="list-style-type: none"> Define Structure for an Expanded Major/Minor Rehab Program (p. 55) Define Structure for an Expanded DPA Program (p. 57)
New Program Establishment	<ul style="list-style-type: none"> Define Structure for an Affordable Rental Housing Rehabilitation Program (p. 58) Define Structures and Roles for a Revolving Loan Fund (p. 61) Define CLT Mission and Outcomes (p. 63) Delineate Roles in Operationalizing CLT (p. 64)
Ongoing Regulatory Improvements	<ul style="list-style-type: none"> Implement Local Land Use and Development Code Modifications (p. 66) Define City Priorities for Improving Landlord-Tenant Relations (p. 68) Define City Role in Efforts Requiring Legislative Improvements (p. 69) Define Priorities and Opportunities to Align Housing and Homelessness Initiatives (p. 69)

Theme	Topics
Stage 3: Program Evolution	
Refinement of Policies and Programs	<ul style="list-style-type: none"> Conduct a Program Evaluation (p. 73) Refine Programs (p. 74) Refine Roles and Responsibilities (p. 75) Revisit Administrative Priorities and Objectives for Program Delivery (p. 75) Revisit Housing Office Organizational Structure (p. 76)

Source: SGS Economics & Planning, 2025

Recommendations for Initial Next Steps

The success of this Plan relies on having ongoing conversations and strategy sessions among leaders and stakeholders. As outlined in the Introduction and following chapters, the proposed next steps are focused on supporting this need:

- Assemble an informal Advisory Group with key staff and partners to set up guardrails for how to move forward with initial Plan priorities.
- Create a Principal Housing Position to facilitate the actions in the HAIP.

1. Introduction

This roadmap to implement effective affordable housing policies, programs, funding and governance structures for the City of Oklahoma City is built on the momentum of more than a decade of rigorous data-driven analysis, community engagement and strategic planning. It represents a further embodiment of the City's commitment to addressing the community's needs in ways that are appropriate to the city's culture and economy.

1.1 Background

The City's comprehensive plan, **planokc** was adopted in July 2015 and informed by a Housing Market Study (HMS) completed in 2013. In 2021, while the City updated the HMS, it commissioned and completed a Housing Affordability Study (HAS)¹ along with an update to its Analysis of Impediments to Fair Housing (AI).

Through a robust process that included an Advisory Group, focus groups, a community-wide survey, analysis and research, the HAS concluded that nearly 45,000 housing units across the city needed to be built, preserved or rehabilitated to address poor conditions and remedy household affordability problems (suggesting this total unit estimate could become a 10- to 15-year target). Among the key recommendations to address these and other housing concerns, the study identified:

- **5-point strategy:** 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.
- **Potential funding resources:** Supported with conventional subsidies (that range between 15% and 20% of total project costs), more than \$1 billion (in subsidy) might be needed to address 100% of the need. However, accounting for the City's existing federal allocations (HOME and CDBG) over the next 10 years and the potential for a future GOLT bond, the HAS estimated a scenario in which 13% of that total need could be addressed.
- **Implementation steps:** 1) Define a clear set of housing policy objectives to support a Housing Framework; 2) Outline a comprehensive approach to meeting these objectives using the full array of resources available to local agencies in the community; 3) Define a timeline for implementation; 4) Identify a process and metrics for accountability to assess HAIP progress.

¹ <https://www.okc.gov/departments/planning/what-we-do/plans-studies/the-housing-affordability-study-2021>


1.2 Status Update

Since completion of the HAS, the market has continued to change, impacting people's lives and complicating efforts to address housing problems. On the one hand, although the economy recovered from the COVID-19 pandemic and supply-chain disruptions, it began overheating, as did the housing market. In response, the Federal Reserve lifted the cash rate target to tame inflation, but in doing so increased the cost of borrowing for home purchasers and businesses. On the other hand, as this brief status update highlights, while some changes have re-emphasized a continued need to address certain housing segments of the City's population, there has also been positive and significant progress toward addressing the HAS recommendations. These quantitative and qualitative updates are summarized below.

Changes in Housing Conditions

The HAS documented a wide variety of metrics that characterize housing affordability trends and conditions. Key metrics documented included overall growth, overall cost-burden, high loan denial rates, and high eviction rates, among others. The following describes these changes (with data presented in the HAS Appendix B).





TABLE 2: SUMMARY OF HOUSING CONDITIONS THEN AND NOW

Category	HAS (2021) ²	HAIP (2024) ³
Households 	<p>Between 2010 and 2019, Oklahoma City grew by approximately 20,000 households. Owners accounted for about one-third of this growth while renters accounted for two-thirds.</p> <p>The predominance of renter household growth was common across the country following the Great Recession. It ushered in a strong uptick in the construction of apartment stock, but also significantly increased the scale of renter problems.</p>	<p>In the few years since the completion of the HAS (2019 to 2022⁴), the city grew by more than 27,000 households – 4 times the prior decade's annual growth rate.</p> <p>Although the split of household growth flipped (with owners and renters accounting for 65% and 35% of growth, respectively), the scale of growth has translated to continued pressure on the housing market.</p>
Housing Inventory	<p>Analysis of housing inventory data and households showed a mismatch between the diversity of new households (by size) to</p>	<p>The need for 1-2 bedroom inventory is not being met and the construction of larger homes continues to grow.</p>

² Based on data from U.S. Census 2019 ACS, the most up to date information available at the time.

³ Based on data mainly from U.S. Census 2023 ACS, the most up to date information available at the time.

⁴ For which 5-year ACS estimates data are available from the U.S. Census.

Category	HAS (2021) ²	HAIP (2024) ³
	the city and a lack of similar diversity in the new inventory.	
Loan Denial Rates⁵ 	In 2019, the loan denial rate in Oklahoma City was 8.5% (13.6% among African Americans). Of concern was not only the fact that minority denial rates were persistently higher, but also that the overall rate for the city was higher than the US average (approximately 7.5%).	By 2023, the loan denial rate had increased to 11.5% (17.8% among African Americans). With other factors at play in the broader economy (such as inflation and subsequent increases to the cash rate target by the Federal Reserve), the city's overall denial rate remained higher than the US average.
Eviction Rates 	During 2019 and 2020, 14% of the city's renters experienced eviction (well above the national average ⁶). Had an alternative dispute resolution process been available to some of them, this rate might have been lower. ⁷	In 2024, it was reported that no improvement in the eviction rate had been made, meaning it remained 14%. ⁹
Overall Cost Burden 	In 2019, 68,000 (or 28%) of the city's households were spending more than 30% of their gross income on housing, with 42,000 of them (61%) being renters. ¹⁰ Also problematic was the fact that the number of cost-burdened households had been increasing at 370 per year between 2010 and 2019.	By 2022, the number of cost-burdened households had increased to 77,000 (29%), of which renters now accounted for 48,000 (an increase to 62%). Of concern is the fact that the scale of the problem had increased at a rate 6 times the prior decade (approximately 2,200 per year versus 370).
Renters <60% AMI	Among the cost-burdened renter households, approximately two-thirds (38,200) have incomes only at or below 60% AMI. This subset of cost-burdened	By 2022, the portion of all cost-burdened renters with incomes at or below 60% AMI had increased to 69% (44,600). In context of the data presented in the box above, this subset grew at 2,100 per year,

⁵ Analysis of Home Mortgage Disclosure Act (HMDA) data for conventional loans for home purchase as principal place of residence.

⁶ Information and data obtained from the Eviction Lab documented the city's relatively higher rate by comparison to the national average. Although data were collected using the same methodology across the country (permitting points of comparison), authors of the data source acknowledge the limitations of the data to illustrates scale, i.e., overall eviction rate.

⁷ Analysis of Oklahoma Policy Institute (OPI) data.

⁹ <https://www.oklahoman.com/story/news/2024/07/09/oklahoma-eviction-rates-landlords/74326476007/>

¹⁰ Analysis of U.S. Census ACS 5-year estimates data.

Category	HAS (2021) ²	HAIP (2024) ³
	renter households had been growing at 200 per year since 2010.	meaning that 95% of all new cost-burdened renter households had incomes of 60% AMI or less.

Source: SGS Economics & Planning, 2025

Progress Toward Zoning Modifications

The HAS recommended the City consider a series of targeted development code modifications. Since then, some of these have moved forward and reflect a broader momentum toward changes beneficial to affordable housing solutions. It should be noted that the Code Update project's own surveys, outreach, and analyses revealed the need and desire for the same zoning modifications.

TABLE 3: DEVELOPMENT CODES UPDATE PROGRESS

HAS Actions Recommended (HAS Section 7.3.8 and 7.4.2)	Development Codes Update Project and Direction
Allowing Accessory Dwelling Units (ADU) by right	An ordinance to update the existing code to allow ADUs (as a conditional use) in the Urban Medium (UM) and Urban High (UH) Land Use Typology Areas (LUTAs). The ordinance was introduced at City Council in December 2024.
Pilot zoning changes in the core and neighborhood surrounding Downtown where reductions could be made to minimum lot size.	The Development Codes Update Project has focused on developing new zones for the Urban Medium LUTA and related use, building design, and site development standards. These new UM zones encourage a variety of development types, including mixed-use development, and guide density to appropriate locations while ensuring compatibility with adjacent and surrounding neighborhoods.
Create affordable opportunities near transit and explore the extent a density bonus for affordable housing could be effective.	The Development Codes Update Project is also focused on new commercial zones to accommodate multi-dwelling uses with a general density range of 20 to 75 dwellings per acre, increasing to 95 in Transit-Oriented Development (TOD) areas. Building height could be further increased if developed according to the City's affordable housing policy (yet to be determined). ¹¹

Source: City of Oklahoma City (2024); SGS Economics & Planning, 2025

¹¹ And with the work completed in the HMS and the Alliance's Downtown Housing Study, which assessed issues of market readiness and development, progress has been made toward understanding opportunities and constraints to higher-density development particularly downtown.

Progress on Homelessness Strategies

Simultaneous to the completion of the HAS, the City also completed its Strategies to Address Homelessness (2021), which outlined a comprehensive action plan with eight areas of focus, including prevention, affordable housing, outreach and case management, emergency and temporary shelter, transitional youth services, transportation, funding sources and advocacy.¹²

Since that time, the Key to Home Partnership (K2H) was launched in September 2023 and has acted on several recommendations from the Strategies to Address Homelessness. Progress has been made on a few actions which are closely tied to a few HAS recommendations – specifically, those focused on addressing vulnerable and at-risk population needs. These K2H accomplishments have included:

- **Outreach and Engagement:** Created geographic zones and assigned them to specific outreach teams, increasing efficiency, rapport and outcomes.
- **Landlord Engagement:** By building relationships with landlords and providing landlord support, housing stock available to clients in the homeless response system is being increased.
- **Encampment Rehousing Initiative (ERI):** This effort brings services directly to encampments with the intention of housing people experiencing chronic, unsheltered homelessness at the location within four to six weeks. With a goal to house 500 people who have been sleeping outside by the end of 2025, the initiative is currently ahead of schedule.
- **Youth Focused Interventions:** As a Youth Homelessness Demonstration Project (YHDP) grant recipient, K2H facilitated youth-led programming intended to reduce youth homelessness. These projects included diversion, housing, and expanded drop-in service hours, leading to housing or diversion for over 200 youth to date, far exceeding the goal of 100 youth by the end of 2025.
- **Rental assistance:** Local Public Housing Authorities (including OCHA and OHFA) have committed 200 Housing Choice Vouchers (HCV) over the next two years. Additionally, rental assistance and supportive services for another 300 households have been committed through a Rapid Rehousing program, increasing housing subsidies available to unhoused people by 500 units over the next two years.
- **Furniture and household supplies:** K2H’s public-private funding model allows private funds to be raised and maximizes allocated public funds. In its first year, K2H raised over \$4 million in private funds to support furnishing apartments, move-in-kits, and more activities to reduce barriers through the housing process.
- **Case management:** K2H case management has been expanded by adding 16 non-City positions to provide 12 months of case management support to clients housed through the Encampment Rehousing Initiative.
- **System and Software Updates:** Padmission and Neighborly software have been acquired to support streamlining and efficiency in the housing process. The Homeless Management Information System has also been centralized to the City, to enhance performance management, resource alignment, and data

¹² <https://www.okc.gov/departments/planning/programs/homelessness/strategies-to-address-homelessness-in-oklahoma-city>

quality. These factors are expected to help the City receive more funding for homeless services initiatives.

Progress on Improving Landlord-Tenant Relations

Momentum toward improving landlord-tenant relations has also been made by the Housing Stability Coalition (HSC), a group representing a broad diversity of stakeholders (of which the City is a participant). The group emerged after completion of the HAS as a result of various coalition members working on similar legislative initiatives at the capitol.¹⁴ **Table 4** summarizes the progress made to date.

TABLE 4: LEGISLATIVE SUCCESSES IN ADDRESSING HOUSING STABILITY

HAS Actions Recommended (HAS Section 7.1.1)	HSC Direction
Recommendations aimed at strengthening support to vulnerable populations	In the 2021 legislative session, SB 200 was signed into law and allows tenants to terminate their lease without penalty if they are a victim of domestic violence.
Recommendations aimed at rebalancing right-to-repair provisions	In the 2022 legislative session, HB 3409 was signed into law to give renters a faster response when a rental property needs essential repairs. Previously, tenants were able to deduct only \$100 worth of repairs from their rent. Under HB 3409, after notice to the landlord, if repairs that materially affect health or safety are not made, the tenant can complete repairs and be reimbursed up to a month's rent. While this represents progress, there remains a cumbersome process for tenants to go through to take advantage of the repair reimbursement.
Support statutory reforms, including updating the Oklahoma Residential Landlord and Tenant Act, §41 Oklahoma Statutes (ORLTA) ¹⁵ to improve provisions	Passed in 2023, HB 2792 requires eviction notices to be written in clear, understandable language. In 2024, the HSC successfully discouraged legislation (HB 3095) that would have further weakened tenant protections in the ORLTA. HB 3095 had proposed revised definitions of what did and did not constitute retaliatory actions, and had provided remedies for landlords with tenants making invalid retaliation complaints. ¹⁶

Source: HSC; SGS Economics & Planning, 2025

¹⁴ This group was more formally organized in June of 2023 when about 20 coalition members met for a strategic development session and created a mission statement and organizational vision. Its membership includes a wide range of interests across policy groups, non-profit service providers, business interests and local governments.

¹⁵ <https://law.justia.com/codes/oklahoma/title-41/>

¹⁶ <https://legiscan.com/OK/text/HB3095/id/2960349>

1.3 Housing Affordability Implementation Plan

Against the backdrop of planokc and the HAS, and progress made toward addressing many of the city's housing needs (summarized above), this Housing Affordability Implementation Plan (HAIP) is intended to be a comprehensive, feasible and prioritized roadmap for addressing affordable housing deficiencies in Oklahoma City. Specifically, its actions are:

- Defining a clear set of objectives to implement the preferred HAS recommendations
- Outlining a comprehensive approach to meeting these objectives
- Establishing a timeline for implementation
- Identifying a process and metrics to create accountability in assessing HAIP progress

Guiding Principles

The HAIP has been tailored to give current and future decision-makers pathways and considerations for establishing and operationalizing legal and organizational structures, policies, programs and partnerships over the next 5 to 10 years.

To ensure that goals and actions are responsive to an evolving environment but relevant to the city's culture, guiding principles have been grounded in the opinions and perspectives of the community, its stakeholders, participants from the HAS focus groups and Advisory Group, as well as the perspectives gathered through engagement with the City's leadership and stakeholders during the HAIP process. These principles included the following:

- Utilize and leverage the existing system and its components of resources and partnerships and build capacity to support the expansion and enhancement of programs and services over time.
- Facilitate collaboration and coordination of activities among the City's traditional and non-traditional housing partners.
- Administer with transparency, accountability to the public, efficiency and relative autonomy.
- Commit and steward new public resources to promote stability and sustain quality of life for current and future residents in accordance with City Council Priorities.
- Design flexibility into policies and programs so that the City and its partners can be responsive in an evolving environment.
- Align actions, programs and resources with fair housing principles as outlined in the City's Analysis of Impediments to Fair Housing report (2019).¹⁷
- Establish priorities so that resources benefit the community's residents and businesses and avoid the unintended consequence of giving advantage to potentially predatory interests.

¹⁷ <https://www.okc.gov/home/showpublisheddocument/21119/637467360314030000>

Approach

The HAIP process has been guided by extensive engagement with City staff, officials, agencies, organizations, user groups, individuals and City partners. The HAIP is also informed by and aligned with other strategic plans, policies and programs, including **planokc**, the City's 5-Year Consolidated Plan¹⁸, initiatives in the City's K2H Partnership, the Mayor's Strategies to Address Homelessness in Oklahoma City, and the Planning Department's current Development Codes Update project.

Management of the HAIP project included oversight from an Executive Advisory Group (EAG) consisting of the Planning Director, Assistant City Manager, and City Manager. The Project Team was co-led by Principal Planners in the Planning Department who manage the Housing and Community Development Division and the Plan Development and Implementation Division respectively. Principal Consultants from Economic Planning Systems, Inc., and SGS Economics and Planning, Pty. Ltd., served as project managers, subject matter experts, and authors of the HAIP.

The EAG facilitated City Council briefings to inform and gather input from councilmembers about the priorities for the City's interests and role in promoting affordable housing. The Project Team and EAG met regularly throughout the creation of this plan. In addition to the briefings, Project Team members met individually with City Councilmembers as requested for 'deep dive' discussions. Outreach and information gathering with existing and potential partners (both local and national) included interviews with local non-profits and foundations, national organizations who partner locally for capacity building and funding, The Alliance for Economic Development for Oklahoma City, and the Oklahoma City Housing Authority and others. The Project Team also interviewed senior housing staff in numerous cities, including Austin, Burlington, Charlotte, Columbus, Denver, Indianapolis, San Antonio, and Tulsa to inform development of the HAIP.¹⁹

1.4 Glossary and Abbreviations

TABLE 5: GLOSSARY AND ABBREVIATIONS

Acronym	Definition
ADU	Accessory Dwelling Units
AMI	Area Median Income
CDBG	Community Development Block Grants
CDC	Centers for Disease Control
CDFI	Community Development Financial Institution
CHDO	Community Housing Development Organization

¹⁸ An assessment required to maintain allocation of federal program dollars, including HOME and CDBG.

¹⁹ A complete list of interviewees and project team members is provided in the Appendices.

Acronym	Definition
CLT	Community Land Trust
CoC	Continuum of Care
DBE	Disadvantaged Business Enterprise
DPA	Down Payment Assistance
EAG	Executive Advisory Group
ERI	Encampment Rehousing Initiative
ESG	Emergency Shelter Grant
GIS	Geographic Information Systems
GOLT	General Obligation Limited Tax (Bond)
HAIP	Housing Affordability Implementation Plan
HAS	Housing Affordability Study (2021)
HCD	Oklahoma City Housing & Community Development Division
HCV	Housing Choice Vouchers
HOME	HOME Investment Partnership Programs
HOPWA	Housing Opportunities for Persons With AIDS Program
HMDA	Home Mortgage Disclosure Act
HMS	Housing Market Study (2013 and 2021)
HSC	Housing Stability Coalition
HUD	Department of Housing & Urban Development
K2H	Key to Home (Partnership)
LIHTC	Low Income Housing Tax Credit
LISC	Local Initiatives Support Corporation
LUTA	Land Use Typology Area
MBE	Minority Business Enterprise
NOAH	Naturally Occurring Affordable Housing
OCEDT	Oklahoma City Economic Development Trust
OCHA	Oklahoma City Housing Authority
OCURA	Oklahoma City Urban Renewal Authority
OHFA	Oklahoma Housing Finance Agency
ORLTA	Oklahoma Residential Landlord and Tenant Act
PHP	Principal Housing Position

Acronym	Definition
PSH	Permanent Supportive Housing
QAP	Qualified Allocation Plans
RAD	Rental Assistance Demonstration
RLF	Revolving Loan Fund
RFP	Request for Proposals
SBE	Small Business Enterprise
SIP	Strategic Investment Policy
TIF	Tax Increment Finance
TOD	Transit-Oriented Development
UH	Urban High
UM	Urban Medium
URLTA	Uniform Residential Landlord and Tenant Act
WBE	Women-Owned Business Enterprise

Source: SGS Economics & Planning, 2025

1.5 How to Use this HAIP

The HAIP is arranged into 3 stages that provide a flexible sequence of actions (as illustrated in **Table 6**) so the City and its partners can respond to emerging needs and opportunities.

- **Stage 1 – Establishing Visibility, Initializing Priorities for Staffing, Investment and Partnerships:** This includes communication and public accountability, staffing and coordinated housing functions across partner organizations.
- **Stage 2 – Policy and Program Development:** This includes improving landlord-tenant relations, alignment with strategies to address homelessness, zoning code modifications and development review processes, public land development, expanding existing programs, and establishing new programs.
- **Stage 3 – Program Evolution:** This includes refining programs and policies, revisiting partner roles and responsibilities, and the evolution of staff resources.
- **Appendix:** The sections of the appendix serve as a resource library to support decision-making and provide examples of housing policy and program experiences in other cities.

TABLE 6: IMPLEMENTATION PLAN ORGANIZATION

Theme	Topics
Stage 1: Establishing Visibility, Initializing Priorities for Staffing, Investment and Partnerships	
Public accountability and communications plan	<ul style="list-style-type: none"> ▪ Adopt Clear Definitions for Affordable Housing (p. 28) ▪ Define Housing Production, Preservation, and Rehabilitation Metrics (p. 29) ▪ Define Achievable 10- or 15-Year Goals (p. 30) ▪ Develop a Communications Plan (p. 32) ▪ Establish Web Presence for Tracking Progress and Outcomes (p. 32) ▪ Create Advisory Group (p. 33)
Staffing and coordinated housing functions across the Planning Department	<ul style="list-style-type: none"> ▪ Secure Funding Source for PHP (p. 34) ▪ Define the PHP Roles and Responsibilities (p. 34) ▪ Obtain Approvals for PHP, Advertise and Recruit (p. 36) ▪ Review Planning Department and Division Sections and Functions (p. 36) ▪ Create a Working Version of Possible Future Organizational Structures (p. 37)
Local Investment	<ul style="list-style-type: none"> ▪ Define Key Objectives for Local Investment (p. 38) ▪ Define Priority Uses and Limitations (p. 38) ▪ Review and Amend the City's Strategic Investment Policy (SIP) and GOLT Policy to Reflect HAIP Goals/Priorities (p. 41) ▪ Define Priorities for Use of Public Land (p. 41)

Theme	Topics
Partnerships	<ul style="list-style-type: none"> Assess Existing Partner Capacity, Needs and Gaps (p. 43) Assess Emerging and Existing Partner Capacity, Needs and Gaps (p. 43) Explore Non-Traditional Partner Opportunities (p. 46) Identify System-Wide Capacity, Skills, and Resource Gaps (p. 48) Defining a Potential National Partner's Role (p. 48) Funding Options for National Partner (p. 49)
Stage 2: Policy and Program Development	
Development Process Efficiency	<ul style="list-style-type: none"> Assess and Refine Development Review and Permitting Processes (p. 52) Review Key Content Requirements (p. 53) Review and Align Processes and Timing (p. 54) Review and Refine Key Evaluation Criteria (p. 54)
Existing Program Evaluation and Expansion	<ul style="list-style-type: none"> Define Structure for an Expanded Major/Minor Rehab Program (p. 55) Define Structure for an Expanded DPA Program (p. 57)
New Program Establishment	<ul style="list-style-type: none"> Define Structure for an Affordable Rental Housing Rehabilitation Program (p. 58) Define Structures and Roles for a Revolving Loan Fund (p. 61) Define CLT Mission and Outcomes (p. 63) Delineate Roles in Operationalizing CLT (p. 64)
Ongoing Regulatory Improvements	<ul style="list-style-type: none"> Implement Local Land Use and Development Code Modifications (p. 66) Define City Priorities for Improving Landlord-Tenant Relations (p. 68) Define City Role in Efforts Requiring Legislative Improvements (p. 69) Define Priorities and Opportunities to Align Housing and Homelessness Initiatives (p. 69)
Stage 3: Program Evolution	
Refinement of Policies and Programs	<ul style="list-style-type: none"> Conduct a Program Evaluation (p. 73) Refine Programs (p. 74) Refine Roles and Responsibilities (p. 75) Revisit Administrative Priorities and Objectives for Program Delivery (p. 75) Revisit Housing Office Organizational Structure (p. 76)

Source: SGS Economics & Planning, 2025

2. Stage 1: Initializing Priorities for Staffing, Investment and Partnerships

The first stage of the Implementation Plan outlines actions related to priorities, roles and responsibilities. This groundwork will be critical to informing policy and program development, resource management and administration. Key components include:

- Establishing visibility for the HAIP
- Priorities for staffing
- Priorities for local investment
- Priorities for partnerships

As summarized in **Table 7**, the first stage is a series of decisions to delineate next steps. While its sequence is intended to be flexible, the steps do need to be completed prior to the next stage (**HAIP Section 3**).

TABLE 7: FIRST STAGE OVERVIEW

Goals	Actions
2.1 Establish Visibility for Implementation Plan	
Goal 2.1.1: Groundwork	<ul style="list-style-type: none"> ▪ Adopt Clear Definitions for Affordable Housing ▪ Define Housing Production, Preservation, and Rehabilitation Metrics ▪ Define Achievable 10- or 15-Year Goals
Goal 2.1.2: Public Accountability and Communications Plan	<ul style="list-style-type: none"> ▪ Develop a Communications Plan ▪ Establish Web Presence for Tracking Progress and Outcomes ▪ Create Advisory Group
2.2 Priorities for Staffing	
Goal 2.2.1: Key Role within Planning Department	<ul style="list-style-type: none"> ▪ Secure Funding Source for PHP ▪ Define the PHP Roles and Responsibilities ▪ Obtain Approvals for PHP, Advertise and Recruit
Goal 2.2.2: Coordinated Housing Functions within Planning Department	<ul style="list-style-type: none"> ▪ Review Planning Department and Division Sections and Functions ▪ Create a Working Version of Possible Future Organizational Structures
2.3 Priorities for Local Investment	

Goals	Actions
Goal 2.3.1: Local Financial Investment	<ul style="list-style-type: none"> Define Key Objectives for Local Investment Define Priority Uses and Limitations Review and Amend the City's Strategic Investment Policy (SIP) and GOLT Policy to Reflect HAIP Goals/Priorities
Goal 2.3.2: Investment of Public Land	<ul style="list-style-type: none"> Define Priorities for Use of Public Land
2.4 Priorities for Partnerships	
Goal 2.4.1: Existing Partner Capacity	<ul style="list-style-type: none"> Assess Existing Partner Capacity, Needs and Gaps
Goal 2.4.2: Emerging Partner Capacity	<ul style="list-style-type: none"> Assess Emerging and Existing Partner Capacity, Needs and Gaps Explore Non-Traditional Partner Opportunities
Goal 2.4.3: National Partner Potentials	<ul style="list-style-type: none"> Identify System-Wide Capacity, Skills, and Resource Gaps Defining a Potential National Partner's Role Funding Options for National Partner

Source: SGS Economics & Planning, 2025

2.1 Establish Visibility for Implementation Plan

Laying the groundwork will involve creating structures to embed visibility and accountability in what follows, including:

- Defining affordable housing terminology
- Defining metrics for tracking progress
- Defining achievable targets or goals
- Developing a Communications Plan
- Establishing a web presence for the HAIP and associated metrics
- Creating an Advisory Group for guidance through critical junctures

Goal 2.1.1: Groundwork

The first goal is defining terms, metrics for tracking, and establishing achievable targets.

Adopt Clear Definitions for Affordable Housing

The **HAS Section 7.3.4** recommended that adopting a common language around affordable housing concepts would be critical. While terms of art are used by different stakeholders, a common language and understanding will be most effective at achieving mutual goals efficiently. Considerations include:

- **Clarify, define or “adopt” terminology for programmatic purposes:** This could include guidelines around consistent usage of terms like accessible, attainable, or workforce housing, etc. It would also contain guidelines around consistent usage of statistics that define aspects of housing affordability, such as area median incomes (AMI), cost burden, the datasets that are used to calculate AMIs and % AMIs, etc. Details of these basic concepts are provided in the **HAIP Appendix A** (see page 124).
- **Adapt existing and new local program language:** The City should examine language used in its current programs and policies and identify opportunities for revision and adaptation along these lines. This will also include the pursuit of expanded existing and new policies as discussed later in this chapter.
- **Align partner usage of terminology:** Common terminology is an important part of what ensures the system works as effectively as possible. While it will not be possible to assimilate terminology across programs using HUD funds and local resources, the City can work to ensure that common terms and definitions are used across programs and policies that use City or local partner resources. This might be one of the objectives for the Advisory Group.
- **Build community awareness and understanding:** Using consistent terminology in educational and outreach will also ensure the broader community, including neighborhood associations, as well as residents, understand the issues and appreciate what is being explored through this Implementation Plan and why.

Define Housing Production, Preservation, and Rehabilitation Metrics

Defining metrics to track over time will be important in documenting progress. Which metrics to track, however, will depend not only on what issues are being addressed, but also on underlying sources of information and how frequently data are available. Metrics might include (at a minimum):

- **Production:** This would be an essential metric to track units produced, preserved, rehabilitated or supported via DPA assistance by AMI level and tenure.
- **Households or individuals:** This would include households or individuals assisted through housing or service investments, as well as participants in community education, certification, trainings, or counselling.
- **Cost burden:** Tracking reduction in cost-burdened households by AMI, tenure or by geography.
- **Equity:** Tracking the reduction in loan denials by race or reduction in evictions.
- **Funding:** For accountability (and internal evaluation) purposes, metrics could include documenting each project’s total cost, local, state and/or federal resources used, as well as leveraged dollars (e.g., conventional financing, equity) and other sources. This would create a clear line of sight with the value-for-money criteria sought in the RFP process as well as support and validation to the City’s leadership regarding the leveraging power in use of local dollars.

- **Community sentiment:** The **HAS Appendix** includes the survey instrument used to collect information, including questions gauging perception of problems, challenges or issues regarding housing condition and affordability, etc. A part of tracking success in outcomes could also include the incorporation of a few new questions styled after some of the HAS survey questions into the City's annual Citizen Survey.

The purpose is to create an accountability feedback loop between the public and City leadership to inform and demonstrate progress, e.g., quantifying how well cost-burden is being addressed.

Define Achievable 10- or 15-Year Goals

Current resources, production and the achievability of scaled goals are limited and cannot be stretched any further. Entitlement federal grant funds constitute the City's primary (direct) resource for producing, preserving or rehabilitating affordable housing, and average not much more than \$2 million per year. Moreover, a variety of factors governing the allocation of tax credit equity (as well as entitlement funds), including volume caps and market conditions, which means that production scalability of federal funds and LIHTC equity is limited.

Between 2019 and 2023, allocation of 4% and 9% equity produced or rehabilitated an average of approximately 600 units per year in our city, but over the longer-term, delivery averaged only about 400 per year. If the City's affordable housing target were set at the total estimated need of 44,600 units (**HAS Section 7.4**), including 25,340 units of rental production and rehabilitation, it would take 40-60 years at this rate.

This action, as rooted in **HAS Section 7.3.10** and 7.4.1, is oriented around developing an achievable target through a Funding and Financing Strategy once it becomes clearer what sources, how much and what type of local investment may be available. Such a strategy would include a full accounting of all delivery models and mechanisms, sources (direct and leveraged) and uses, with consideration for the following:

- **Capacity:** Account for producer and supplier capacity in the strategy, with consideration for current and potential rates of production, preservation and rehabilitation across the system.
- **Sources:** Account for structural source limitations, including tax credit equity volume caps, entitlement funding limitations, construction costs, cost of borrowing, land values, and other relevant development and operational finance inputs and assumptions.²⁰
- **Uses:** Identify how funds are to be used (and allocated), including production, preservation, rehabilitation, supportive services (if applicable), along with the different relevant delivery models by household type, income level, tenure, etc.
- **Delivery models:** Account for details and specific development and operational characteristics of each delivery model, development prototype, and/or any CLT structures. It would also include consideration for the use of a Revolving Loan Fund (RLF), through which delivery models would be facilitated.

²⁰ According to OHFA, it is estimated that Oklahoma has a \$4 million tax credit volume cap, though this has not been reached.

- **Direct sources of capital:** Identify sources of local (direct) investment, including: any proceeds from a housing bond, use of TIF, use of property tax abatements (for example), use or discounting of publicly owned land, HOME or CDBG funds.
- **Indirect sources of capital:** Include (indirect) leveraged funds or financing, including LIHTC equity, 221(d)4 permanent financing, conventional debt, and any other current funding or financing opportunities, such as Homes Investment Act, SB67, and others.
- **Areas for investment:** Much of the analysis completed for the HAS was geospatial in nature and contributed understanding of the relative levels of need in different parts of the City. This understanding should serve as a framework for orienting and deciding on general levels of investment or production outcomes to be set as goals. It is important to note that areas of assessed need do not and should not necessarily be equated with the most appropriate areas for investment or intervention. As recommended in **HAS Section 7.3.9**, some of the constructs that could also be applied here include the Land Use Diversity Index or the CDC's Social Vulnerability Index.
- **Other assumptions:** This might include timing or availability assumptions associated with various forms of capital and other emerging factors.

This process may also involve the strategic considerations as shown in **Table 8** regarding the scale of funds available.

TABLE 8: PRIORITIZATION OF FUND USES DEPENDING ON SCALE

Limited Resources	More Extensive Resources
More strategic uses	Broader range of programs and uses
Narrower range of beneficiaries (e.g., AMIs, vulnerable populations)	Broader range of beneficiaries
Target investments with high leverage (e.g., recapitalizing funds, operational subsidy for partners with access to capital and capacity-building, i.e., indirect subsidy for production)	Target wider range of investments, including more expansive program use of direct subsidies for production
Further investigate other non-traditional sources, such as philanthropy or corporate partnerships	

Source: SGS Economics & Planning, 2025

Goal 2.1.2: Public Accountability and Communications Plan

The second goal of establishing visibility for the HAIP is ensuring accountability to the public is maintained through publicly accessible information and communication with stakeholders.

Develop a Communications Plan

Each of the studies and strategies that have led to this Implementation Plan have been informed by extensive community and stakeholder input, including the City's leadership, staff, its local and regional partners, the business community, neighborhood associations, the community of non-profit providers, interested citizens, and others. To maintain alignment with the HAS recommendations, the development of priorities through this Implementation Plan, the City's leadership, partners, stakeholders and the general public, the City should develop a Communications Plan that outlines principles, processes and objectives to uphold moving forward.

Establish Web Presence for Tracking Progress and Outcomes

The City maintains online space for its major plans and studies like **planokc**, the HAS, HMS, its 5-Year Consolidated Plan, Analysis of Impediments, and others. In a similar style, a Communications Plan might outline how an online presence might be built out to demonstrate a continued commitment to transparency and accountability. This might include the following considerations:

- **Online content to demonstrate HAIP progress and outcomes:** Content and metrics across all the City's housing functions (and outcomes) could be consolidated in a single space, compiling information, data, studies and plans, programs, as well as funding levels. The content could be curated around metrics and goals for tracking success emerging from the HAIP and subsequent initiatives. Metrics and data might include both city-wide data points as well as geospatial information and analysis, as well as links to partner web sites.
- **Integration of data platforms:** A part of making information publicly available might be the integration of GIS-based layers of need data (e.g., cost-burdened households by income, by tenure and by Census tract) with metrics for tracking success into a platform that could be used to facilitate further strategic decision-making. One such platform that the City's Office of Innovation is currently trialing is Tolemi, a two-year partnership with Accelerator for America.²¹ Some considerations include:
 - Cost of platform maintenance.
 - Staffing costs associated with keeping data updated (this has a direct implication for the staffing needs of a Housing Office and ultimately its organizational structure – see **HAIP Section 4.1** on page 73).
 - Practical applicability of the information and likelihood of its usage in decision-making settings.
 - Other benefits or potential uses such as strategic planning for identifying publicly-owned sites appropriate for a CLT (**HAIP Section 3.3** on page 62).

²¹ <https://www.acceleratorforamerica.org/news/accelerator-for-america-and-tolemi-launch-the-inaugural-data-for-housing-solutions-cohort>

More broadly, it may be beneficial for the City to maintain such a platform (with both visual appeal and depth of information) given its multiple uses and applications in stakeholder engagement, partner convening, reporting, and decision-making processes.

Create Advisory Group

Support for the HAS and its recommendations was, in part, attributable to the engagement of a formal advisory group with representatives from a full spectrum of housing industry stakeholders. The group explored data and research, informed the development of the community-wide survey, provided feedback and served as co-contributors to its recommendations, as well as ensured that relevant stakeholders, organizations, and the broader public were engaged throughout.

Roll-out of the Implementation Plan is also likely to succeed through the support of an Advisory Group, as well as focus groups targeted at specific implementation topics, such as local investment (see **HAIP Section 2.3.1**). Such a group with broad industry representation would accompany the City through critical junctures or decision points (particularly early in the process), including:

- Assisting with important decision-making at critical points through the HAIP process
- Providing support and guidance to the administration and roll-out of the HAIP
- Providing guidance around use of resources
- Coordinating and supporting decisions on opportunities as they emerge

While membership would ideally include stakeholders who bring either involvement or expertise in various aspects of affordable housing development, policy or program development, or funding and financing, lessons learned suggests, that the City should be intentional about who, why, when and how frequently such participants are brought together. Key considerations might include:

- **Membership:** The City has a deep pool of traditional partners and stakeholders to draw from. Experience from other cities suggests that Oklahoma City should select individuals who ensure that an adequate balance of opposing viewpoints is maintained, that potential or perceived conflicts of interest are managed, and that processes are put in place for effective decision-making.
- **Objectives:** Broadly, the purpose is to ensure that momentum is maintained and that there is a clear line of sight for reporting back to the City's leadership progress being made toward goals, as well as challenges. Ideally, the group's membership would be reflective of planning, housing, urban renewal, legal, economic development and community engagement functions.
- **Purview:** Such a group could function as an advisory body, potentially making recommendations or providing feedback to leadership on issues related to implementation, rather than an approvals body.

2.2 Priorities for Staffing

This milestone includes outlining a series of priorities for staffing and organization, including: 1) a key role within the Planning Department, and 2) ensuring coordinated housing functions within the Planning Department. Some of these actions, however, are already in motion and have evolved over the course of developing the HAIP.

Goal 2.2.1: Key Role within Planning Department

Currently, the City's housing functions sit within the Planning Department's Housing and Community Development Division, and deal almost exclusively with managing federally-funded programs. To address scaled needs and potentially new programs, however, the recommendations in **HAS Sections 7.2.3, 7.3.1, and 7.4.2** draw attention to the importance of having a dedicated Principal Housing Position (PHP) who can bring the right skills and experience to oversee and coordinate the different aspects of Implementation over time.

Secure Funding Source for PHP

Initial conversations during the HAIP process have considered a few different sources, including:

- Local partner dollars and the further development (and alignment) of relationships with the local philanthropic community
- Limited interest accumulation on existing resources
- Potential use of multiple local funding sources

Although the length of time that such funds might support the PHP are currently unknown, the City will need to identify an appropriate and sustainable funding source or sources beyond such time.

Define the PHP Roles and Responsibilities

The nature, complexity, and scale of housing problems identified in the HAS require staffing skillsets and capacity that exceed those currently available within the Planning Department. For the moment, current HCD roles and responsibilities are dictated by the needs of managing and administering federally funded programs.

When addressing similar issues, other cities have either: A) added a key position with high public visibility and accountability or B) added multiple positions within a new or existing department that bring in-house the skills and capacity across specialized functions of housing policy and program investment.

Illustrating how prominently such positions fit within city organizational structures, **Table 9** summarizes titles and direct report structures. Research indicates how closely such roles were positioned to a mayor or

city manager were, in part, a reflection of the urgency of the issues for the community.²² For Oklahoma City's consideration, most roles and responsibilities centered around a few main themes:

- **Qualifications:** Roles with high visibility such as this typically have a background in a relevant field and 10 to 15 years of progressive experience, including management experience, deep knowledge of housing policy, project funding and development finance, public finance mechanisms, public-speaking acumen, as well as administrative experience.
- **Key responsibilities:** Similar positions involve developing, initiating or shaping housing policy, managing programs, leading other staff, overseeing budgets and resources, as well as programs and funding.
- **Specific roles:** Within the context of Oklahoma City, such responsibilities will require both internal- and external-facing responsibilities. This will include coordination across City departments, coordination of existing partnerships (CoC, OCHA, Alliance, OCEDT, OCURA, etc.), coordination across other planning efforts (e.g., Key to Home, Strategies to Address Homelessness, Development Codes Update, etc.), liaising with department and division heads, the City's leadership, as well as marketing and convening of new relationships (e.g., philanthropy, lending industry, syndicators, national partners).

As the HAIP is implemented, the PHP's roles and responsibilities will evolve and need to be revisited. As is likely to occur (and discussed more in **HAIP Section 4.1** on page 75), the breadth and depth of the PHP's activities could reach a scale at which point additional staffing resources might become necessary.

TABLE 9: PRINCIPAL HOUSING POSITIONS IN OTHER CITIES

City	Title	Reports to
Denver	Chief Housing Officer and Executive Director	Mayor
San Antonio	Chief Housing Officer	City Manager
Columbus	Deputy Director of Housing Strategies	Director of Development
Austin	Director of Housing Department	(1 of 5) Assistant City Manager
Charlotte	Director of Housing & Neighborhood Services	(1 of 4) Assistant City Manager
Kansas City (MO)	Housing Director	City Manager (and other directors)
Dallas	Director of Housing & Neighborhood Revitalization	(1 of 5) Assistant City Manager

²² Case study research suggests that such a position will need to carry a title reflective of the public-facing nature of the role, as well as its position within the City's established reporting and governance structure.

City	Title	Reports to
Colorado Springs	Chief Housing Officer	Deputy Chief of Staff Infrastructure & Development (Office of Mayor)
Tulsa	Housing Policy Director	Director of Department of City Experience

Source: SGS Economics & Planning, 2025

Obtain Approvals for PHP, Advertise and Recruit

Following the identification of an initial funding source for the PHP, the appropriate approvals will need to be obtained. While there is a degree of fluidity to the exact staging of them, the City should seek to have an individual in place as soon as possible. It should be noted that it has taken as long as 2 years for other cities to fill similar positions.²³

Goal 2.2.2: Coordinated Housing Functions within Planning Department

As noted previously, the City's housing functions currently sit within the Planning Department, and its staff (HCD) are dedicated almost entirely to federally funded activities. For purposes of the HAIP, this goal is to understand the breadth of resources and capacity across housing functions and begin framing the extent to which additional resources may emerge.

Review Planning Department and Division Sections and Functions

The first action relates to understanding current administrative structures and functions. It seeks to answer: 1) What and where are resources that can be leveraged as the HAIP evolves, and 2) to what extent might additional functions and structures be necessary to support future initiatives? In answering these questions, the City might consider the following:

- **Functions:** Map out how existing positions are dedicated to functional categories, such as major/minor rehab or down payment assistance programs, compliance and monitoring or contracts management.
- **Skillsets:** This might include documenting where individuals have skillsets for their role and where individuals possess capabilities that are not necessarily a requirement of their current position. This will be important in considering to what extent such skillsets in existing staff can be leveraged to support any expansion of housing functions in the Planning Department.
- **Synergies:** Linked to the mapping of skillsets, the City should identify where there may be strong linkages between existing skillsets and the support that may be needed for the PHP

²³ For the City of San Antonio, a context in which the community was particularly sensitive (i.e., critical of) to the City's efforts, it was particularly valuable to find an individual that possessed strong community engagement skills

- **Gaps:** Following the identification of any synergies, the City should identify where there may be resource or skills gaps. While these gaps could initially be managed through partner resources, the desire is to provide the necessary training and upskilling so City staff can grow to fill these needs.

This review is intended to generate insights for the City in planning for and developing a working version of a potential future organization chart (as discussed in the next action), including administrative needs, roles and responsibilities, delineations between a PHP role and HCD roles, cross-sharing of resources or staff, and potential transition points.

Create a Working Version of Possible Future Organizational Structures

City department organizational structures across the country are different because they reflect local needs and priorities. Most contain functions across services like short- and long-range planning, housing, neighborhood services, development review, building, and even economic development. In examining a few of these (see **HAIP Appendix F**) and interviewing respective senior staff, such organizational structures emerged organically and were not necessarily the product of intentional overhauls.

With this as a benchmark, the intent of the Implementation Plan is to allow the City's housing functions to emerge over time, leveraging existing resources where possible and evolving as needs change. As such, this action entails drafting a few possible or aspirational roadmaps with consideration for:

- **Evolution of the PHP role:** The PHP is being brought on board with a breadth and depth of experience to cover a wide variety of roles and responsibilities.
- **Organizational capacity and resources:** As conditions evolve and opportunities arise, it may be necessary to supplement the PHP's roles and responsibilities with additional staff dedicated to specific disciplines. There is both an internal and external component to monitoring capacity and skillsets over time. For example, if partner resources shift and change, it may require a reallocation or rebalancing of internal resources or further coordination of existing or new partners.
- **Reporting structures:** Reporting requirements and responsibilities within the Planning Department, the City Manager's Office.

The possibility of an expanded internal organizational structure and what that could look like, based on our the HAIP's review of other city housing functions, is found in **HAIP Section 4.1** on page 73 of this plan.

2.3 Priorities for Local Investment

The HAS identified housing needs by income, tenure, race, and location (**Chapter 4**). It identified issues of vulnerability, housing condition, and socioeconomic problems (**Chapter 5**). It discussed how these needs might translate to goals and what resources might be necessary (**Chapter 7**). Focus group participants also (**Chapter 1**) contributed many perspectives on how local investment could be prioritized.

While a previous discussion in this plan (**HAIP Section 2.1** on page 30) dealt with a framework for quantifying achievable targets, the breadth of the issues and problems raised in the HAS draws attention to the need to prioritize them. As such, this set of HAIP actions is oriented around setting priorities for the use of local dollars (as well as land).

Goal 2.3.1: Local Financial Investment

Define Key Objectives for Local Investment

HAS Section 6 included an overview of funding and financing mechanisms used across the country, as well as organizational and partnership-oriented solutions. Some of these approaches included the use of dedicated public taxes, TIF, philanthropy, housing bonds, and other non-traditional sources. Before a source can be identified, however, it will be important to establish priorities for how funds are deployed, leveraged, and ultimately used. Overarching principles in priority-setting could include:

- **Leverage:** When looking around the country at affordable housing investment models, each \$1 dollar of a local investment typically leverages \$3 to \$5 dollars in other sources. While different models will have different leverage profiles, it is very important, especially when local resources are limited, that the City achieves greatest value-for-money. Here, the City could identify priority objectives for achieving leverage. This would include drawing attention to all potential conventional and non-conventional²⁴ sources of debt and equity to understand which source offer opportunities for the greatest leverage from outside partners (this discussion aligns with **HAIP Section 2.1** on page 30 regarding defining achievable targets).
- **Recapitalization:** Another value-for-money consideration is whether local investment dollars are used in the form of grants or loans. While several types of development incentives commonly used (see **HAIP Appendix C**) to facilitate affordable housing production, using a revolving loan fund structure (with a sufficient initial investment) not only provides the industry with ongoing opportunities, but also provides assurance to the community that public dollars are being deployed strategically.
- **Scalability and predictability:** One-time infusions of local dollars such as housing bonds can be effective at stimulating the housing sector in production, but it is challenging for producers to build and maintain momentum knowing that once funds have been expended, the drivers for sustaining heightened production capacity may not last. In the context of discussing priority objectives for the use of local investment dollars, the City should establish a strategy that seeks to build and sustain scalability of the system and predictability for the sector.

Define Priority Uses and Limitations

The second layer of priority-setting includes building consensus around how resources are used, who is eligible, who benefits, where and why. In the process of defining objectives, this action should also include

²⁴ This may include philanthropy, the business community, or other resources to be explored such as 1115 Medicaid waivers, as being explored in the Key to Home efforts to support PSH and delivery of behavioral health services (see Section 3.4 on page 54).

the input of the development and finance community in a roundtable or focus group format. They will have opinions on a variety of things, not just funding. Regardless of the source, it will be important for the City to develop a clear narrative around:

- **Key Uses:** Housing production, preservation and rehabilitation numbers were identified in **HAS Section 7.4** for addressing owner²⁵ and renter household needs, including transitional housing. In this action, the City would establish a level of priority for each of these uses. Setting these priorities might require consideration of a variety of quantitative and qualitative factors, including (but not limited to) need, delivery capacity, value-for-money, and cost (refer also to high-level estimates in **HAS Section 7.4**). Other possible uses to prioritize would include down payment assistance, supportive services, and a range of options discussed in other sections of the HAIP, such as a 90-day eviction diversion fund (FlexFund, discussed in **HAIP Section 3.4** on page 69).
- **Eligibility:** In the HAS, recommendations for the use of local funds was divided between commercial and individual applications. For example, local dollars could be made available for commercial lending purposes, such as low-interest loans to developers seeking to produce, rehabilitate or preserve affordable housing. Local dollars could also be made available to individual borrowers in the form of grants or loans for the purpose of individual home rehabilitation, for example. And because some entities lack operational capacity, such as in responding to RFPs, discussed in the next action. Funds could also be made available for capacity grants. For example, the Burlington Community Land Trust makes a small portion of funds through RFP processes available for such purposes to ensure that entities have full operational capacity to deliver with grants ranging between \$10k and \$60k.
- **Beneficiaries:** The HAS also contained analysis of housing mismatch, cost-burden, and vulnerable population needs by AMI. When considering that per-unit subsidies for producing units of affordable housing at lower AMI levels are costlier, the City should contemplate the trade-offs between addressing the needs of the most vulnerable and achieving goals that deliver fewer units overall, versus addressing the needs of slightly higher income households and achieving goals that deliver a higher number of units. The City should also consider in this context whether use of local dollars will be used to expand and extend beneficiary limits beyond those that exist under existing federally-funded programs.²⁶
- **Fund Restrictions:** In addition to identifying the uses, eligibility and beneficiaries of funds, the City should identify the limitations on each occasion of usage. At a high level, this might mean identifying whether grants or loans should be made available for capital, operational or credit enhancement purposes in commercial or individual applications.²⁷ It also means identifying the limits of those dollars available per project. For example, the City may wish to set a limit to funds available for stimulating small infill projects with 15 to 20 units, but not for larger-scale 4% LIHTC projects. The decisions that

²⁵ GOLT funds cannot be used for credit-cleaning or for individual homeownership purposes.

²⁶ **Section 3.2 and 3.3** discuss this element in greater detail. **Appendix C** provides specific examples of program design outcomes that target beneficiaries of different AMI levels through use of local resources

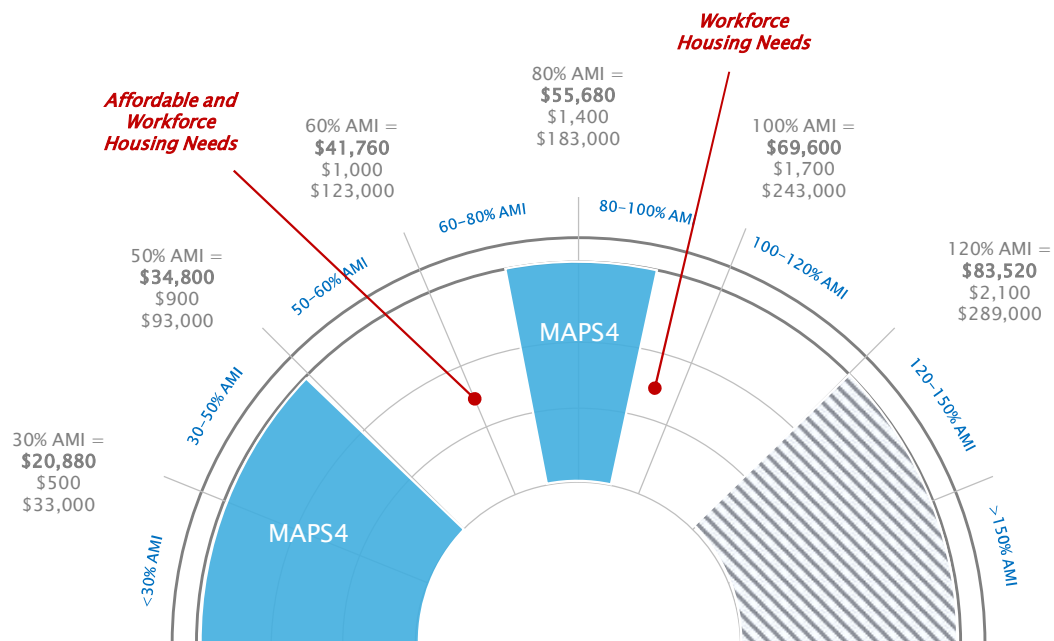
²⁷ In developing details on funding opportunities, the City should consider here (in the context of the Funding and Financing Plan, **Section 4.1** on page 67) types of subsidies that can be made. See **Appendix D**.

need to be made around this require an understanding of both total funds available and desired project outcomes.

- **Geographic Distribution:** The HAS also contained analysis of the geographic distribution of needs and issues (Chapters 4 and 5). The HMS also contained geospatial analysis of housing market information, which can be used (and updated) to identify areas in which investment can be prioritized further based on importance and satisfaction scales.²⁸
- **Existing Resource Gaps:** Defining priority uses may also require an accounting of how existing or foreseeable resources are being leveraged. As an example, **Figure 1** illustrates across which AMI categories OCHA’s projects will deliver units with MAPS4 dollars. Accounting for all such resources (including federal dollars) will ensure that future local investments are being made efficiently.

It is anticipated that trade-offs will need to be made once it becomes clearer what level of local investment is available (see **Table 8** on page 31).

FIGURE 1: ILLUSTRATION OF POTENTIAL FUNDING GAPS



MAPS4 Resource Allocations with Household AMI Categories, Supportable Rents and Purchase Prices (2022)

Source: HUD; SGS Economics & Planning, 2025

²⁸ The use of similar analysis and information had also been a key part of the development of the housing study that factored into plan**okc**.

Review and Amend the City's Strategic Investment Policy (SIP) and GOLT Policy to Reflect HAIP Goals/Priorities

Following the identification of local investment priorities, City will need to review and make appropriate amendments to its SIP and GOLT goals and priorities, as well as the HUD Consolidated Plan and other federal work plan documents.

Goal 2.3.2: Investment of Public Land

Define Priorities for Use of Public Land

In Oklahoma City, many of the City's current public-sector partners, such as OCHA, OCURA, and the Alliance, own, can acquire and develop land. Best practice research is full of examples on publicly owned land being leveraged to achieve a public purpose, such as affordable housing. Depending on its location, size of the site, surrounding uses, and local priorities, publicly owned land development processes typically focus on achieving mixed-use, mixed-income and/or affordable housing development (often in the context of a larger-scale development opportunity).

This action draws attention to establishing a clear and common set of priorities for public land use and development. The intent is to conduct this process with the PHP, Advisory Group, and relevant partners on the following:

- **Development objectives:** This action should first focus on the general priority level for providing housing and specifically affordable housing for such development opportunities. The purpose is not to predetermine uses for all future publicly owned land developments or necessarily to even establish that housing and affordable housing must be provided on every single site (although this could be possible). However, the priority setting here would be focused on developing a set of agreeable terms that reconcile with market need, market development potential, and align with other strategic planning purposes, such as transit-oriented development, corridor planning, and other place-making initiatives.
- **Affordability outcomes:** Another layer of consideration is to reach consensus on a general range of affordability and/or a target AMI for such affordable housing, as well as what portion of such development is to be affordable. Feasibility modelling can be used to support and identify an optimal percentage and depth of AMI level that is supportable across a wide range of site typologies or specific sites. However, this approach should be set with the understanding that while mandatory inclusionary zoning is prohibited by the state, there is no prohibition against developers voluntarily providing affordable housing in exchange for increased development density or other incentives. The objective would be to identify "bright line" rules for this type of public investment, such as types of housing, AMI levels, size of units, and universal design.
- **Financial objectives:** The City and its partners should consider whether and what financial performance metrics might be assigned to such development sites. This process may initially involve agreeing generally that public land used in redevelopment serves as an in-kind (capital) contribution to the development, or that it is offered at a discount from the market rate (as may be established by an appraiser). Either way, this process would eventually require an understanding of each site's characteristics and development potentials, infrastructure and high-level development costs, use

potentials in order to quantify what leverage power such an in-kind contribution or discounted land value may have for achieving some portion of the housing development as affordable and at what affordability level. Additional factors to consider would include whether the City or its partners intend to sale the land or maintain ownership under a long-term ground lease.

- **Public financing:** It will also be helpful to establish a uniform and consistent approach to the use of tax increment financing for housing projects to set the development sector's expectation on the mechanisms available.
- **Subsidy layering:** As discussed in the next chapter under the expansion of existing programs and establishment of new programs, use of HUD funds, for example, are accompanied by restrictive uses and reporting requirements. While there does not need to be a single approach to developments that use grants or loans from multiple sources (using local and federal dollars, for example), the more the City can create clarity for the industry and a process in which developers may wish to use multiple sources, the more effective production outcomes will be.

2.4 Priorities for Partnerships

HAS focus group participants and the Advisory Group encouraged the City to leverage partnerships as much as possible. Currently, Oklahoma City's affordable housing partners are local and regional, contributing in traditional ways. To support a process of exploring partnerships, **HAS Section 6.2.1**, documented a few types of partnerships leveraged successfully elsewhere in the country, which could be categorized in the following ways:

- **Traditional partnerships:** These include housing authorities, urban renewal authorities, economic development entities, the development sector, supportive service providers and non-profits.
- **Non-traditional partnerships:** These include philanthropy, universities, industry associations, and the business community.

Partnerships can also be thought of in terms of how they function within the housing system:

- **Direct contributors:** These include developers, builders, architects, engineers, electricians and contractors involved in production, preservation or rehabilitation, as well as service providers.
- **Indirect contributors:** These include lenders, attorneys, advocates, trainers and certifiers, as well as those who involved with community education or stakeholder engagement.

As such, this set of goals and actions is aimed at building a network of strong and diverse partners to bolster the system and contribute to collective successes.

Goal 2.4.1: Existing Partner Capacity

This first goal is focused on understanding and leveraging the full capacity of the City's traditional partners.

Assess Existing Partner Capacity, Needs and Gaps

To build and strengthen capacity, the City will first need to understand the capacity and resource limits of its existing partners, identifying where gaps may need to be filled, including:

- **Who are they?** This includes identifying and mapping out the City's current local and regional partners. This may include designations for production- versus service-provider. It may also include further designation for type of industry or activity linked to the identified needs in the HAS by delivery models such as ownership or renter housing production, and tenant-landlord relations.
- **What services do they provide?** This includes understanding how they currently interact with the broader housing. For the non-profit sector, this will include identifying their mission statements, what services they offer, and who their partners are.
- **How are they funded?** Are they a direct beneficiary of federal funds, for example? Are they a foundation that also supports one of the City's direct partners?
- **Do they have capacity?** This could be defined as administrative or production capacity or output. For producers, it will be important to understand how many units they typically produce per year. For service providers, how many households they serve each year or how many trainings they perform.
- **Do they perceive unmet demands?** Most partners will be attuned to their own business and market pressures. This may include demand for specific services or demand for production that either does not currently exist or exists in short supply.
- **Do they lack resources to scale their services?** This may include identifying both skills, capacity and funding gaps.

A part of this process will involve engaging with these entities about their activities and plans. This includes understanding their perspectives on the role they think the City could be playing in facilitating enhanced capacity and production.

Goal 2.4.2: Emerging Partner Capacity

In addition to working cooperatively with OCHA, OCURA, OCEDT, the Alliance and others, the HAS recommended that attention be drawn to strengthening capacity within other emerging traditional and non-traditional partners, such as:

- CDFIs and lending institutions
- CHDOs and neighborhood associations
- Institutional partners

Assess Emerging and Existing Partner Capacity, Needs and Gaps

Individuals participating in the HAS, HMS, and AI focus groups included representatives from organizations that could be categorized as emerging partners. Exploring the leverage that some of these entities could

bring to addressing needs also means gaining a more complete understanding of who they are, what they are doing, etc.

- **Who are they?** The purpose of this investigation is to identify all potential emerging partners through direct and coordinated interaction.
- **What (traditional and non-traditional) housing roles are they playing?** This will involve assessing the mission statements, business activities, etc., to gain an understanding of how their services may be directly or indirectly related to housing activities.
- **What are their broader missions?** In assessing synergies with the City's housing goals, it will be important to understand what historically and currently motivates the organization. The City may discover opportunities with partners who have historically been engaged in non-housing activities.
- **Who are their partners?** In branching out, creating linkages and strengthening the bonds within the City's housing ecosystem, it will also be important to understand who these organizations work with – such as other producers or service-providers.
- **What are their accomplishments?** This includes quantifying what these partners do, as measured by their outputs, i.e., units developed, preserved, households assisted, etc.
- **What do they anticipate doing over the next 5 years?** Investigating this issue is focused on identifying where there are opportunities to align collective efforts.
- **What resources do they need to meet demands?** As with the assessment of existing partner capacity, needs and gaps, it will be helpful to understand how and to what extent these potential partners may need more staff, skillsets, resources, etc.
- **What needs, if any, do they have of the City?** It will be instructive for the City to understand how these partners see the City as a supporter or facilitator in their mission, or whether they see opportunities emerging from such a partnership that they could not have achieved on their own.

One area of emerging partner capacity-building could be support for a more robust field of new developers, such as Oklahoma City's PlaceKeepers.²⁹ As a reference for other possibilities, **Table 10** illustrates recent programs and initiatives elsewhere directed at building capacity.

²⁹ <https://www.neokcr.org/placekeepers>

TABLE 10: EMERGING DEVELOPER CAPACITY BUILDING EXAMPLES

Entity	Description
Emerging and Diverse Developers Program (EDD) in St. Paul, Minnesota³⁰	The EDD program provides education and resources for inexperienced affordable housing developers, in particular developers of color. It provides technical assistance, small-group learning, and one-on-one coaching for emerging developers from partners Baker Tilly and NEOO Partners.
Neighborhood Housing Services (RNHS) Emerging Developers Program (California)³¹	Began an Emerging Developers Program in 2021 to provide education and resources to developers of color at any experience level. The three-month program focuses on increasing developer knowledge on infill and single-family projects.
Growing Diverse Housing Developers Grant Initiative (Wells Fargo)³²	Launched in 2022 with \$40 million, the program will support developers of color with lower-cost capital, mentorship, and resources for production of multifamily housing. This initiative's core geographies include California, Texas, Georgia, and metro areas of New York, Philadelphia, Baltimore and Washington, D.C.
Black Developer Capital Initiative (BDCI)³³	A program of the Low-Income Investment Fund, a CDFI focusing on developers of color, the BDCI supports experienced black developers with loans up to \$1 million or lines of credit up to \$3 million to support construction of affordable housing. BDCI currently operates in 17 states, not including Oklahoma. ³⁴
Emerging Minority Developer Fund (EMDF)³⁵	Started in 2020 by the National Equity Fund, a non-profit tax-credit syndicator, with the goal of improving access to LIHTC for minority developers by helping them meet net worth and liquidity requirements. The fund began with \$147 million in capital from philanthropic partners.
Emerging Developer Growth Initiative³⁶	Started by LISC in Indianapolis in 2023 to enhance skills, capacity and access to capital for emerging minority developers to advance missing-middle housing product. LISC makes financing available for acquisition, construction, predevelopment and credit enhancement.

Source: SGS Economics & Planning, 2025

³⁰ <https://www.ramseycounty.us/businesses/property-development/property-development-programs-incentives/emerging-and-diverse-developers-edd-program>

³¹ <https://richmondnhs.org/emerging-developers/>

³² <https://www.capitalimpact.org/programs/wells-fargo-growing-diverse-housing-developers/>

³³ <https://www.liifund.org/strategic-priorities/lending-tools/black-developer-capital-initiative/>

³⁴ https://www.liifund.org/app/uploads/2023/06/LIIF_BDCI-LOC-Round-2-Product-Sheet_03-2023-final.pdf

³⁵ <https://www.nationalequityfund.org/impact/emerging-minority-developer-fund-emdf/>

³⁶ Emerging Developer Growth Initiative | LISC Indianapolis

Explore Non-Traditional Partner Opportunities

Communities across the country are increasingly engaging with non-traditional partnerships to participate in affordable housing initiatives. Partners range from non-profits to the philanthropic and business community. In part, the trend reflects the fact that such partners bolster the effectiveness of the broader housing system with new and sometimes more diverse skillsets and resources.

This task focuses on exploring, building, developing and maintaining transformational partnerships with organizations who have a unique purpose and can play an effective role in bolstering solutions that address the city's needs.

For example, a starting point would be exploring partnership potentials with the healthcare sector and the philanthropic community. One of the focus groups conducted during the HAS brought together local hospital leaders and gathered perspectives and ideas around their respective issues and how they saw their industry contributing (see **HAIP Section 3.4** on page 69 for further discussion). Participants in other HAS focus groups and discussions throughout the development of the Implementation Plan also elevated attention to the role that the philanthropic community could play. As there are several philanthropic entities in Oklahoma City with a diversity of missions, the purpose is to explore partnerships that simulate the successes that have materialized in a few peer cities, as shown below in **Table 11**.

TABLE 11: PHILANTHROPY AND HOUSING IN PEER CITIES

City	Philanthropy
Austin	<p>The Austin Community Foundation was founded in 1977 and is focused on closing the opportunity gap through research, pooled resources, and data-driven grant making. Its grants support health, human services, arts and culture, the environment, community development and community service, education and training, recreation, and animal-related services.</p> <p>The Foundation runs The Housing Accelerator program focused on the production of affordable housing, providing low-cost capital and concessionary loans to developers for short-term pre-development, land acquisition, and bridge financing. This enhances developer capacity to acquire land and build more affordable units. In 2023, the Foundation invested \$2.4 Million toward the development of affordable and supportive housing.</p>
Atlanta	<p>The Community Foundation for Greater Atlanta (CFGa) was founded as a traditional philanthropy in 1951, distributing dollars to various causes and opportunities. Its primary programs include TogetherATL and GoATL, a grant program and an impact fund strategy respectively, focused on furthering equity in arts and culture, housing, and economic and neighborhood development.</p> <p>CFGa invests in housing through capital and grants to support better policy, programs, and longer terms of affordability and through capital that supports production and preservation. They also spearhead collaborative efforts, have housing strategies in three targeted neighborhoods, and create long-term partnerships. In 2022, CFGa raised \$150 Million to support housing affordability.</p>

City	Philanthropy
Minneapolis	<p>The GroundBreak Coalition is a public-private coalition of philanthropy and business that started in 2022. It raised nearly \$1 billion in 2023 to support new financial tools and products to increase the number of Black homeowners and entrepreneurs in the Twin Cities. Aid is scheduled to start in 2025. These tools include downpayment assistance, start-up loans, and commercial mortgage loans, amongst others.</p> <p>The Minneapolis Foundation facilitates grant making for a range of focus areas across civic, social, and economic needs. Among various other funds, the OneMPLS fund, launched in 2019, focuses on one-three issues yearly, and has made significant impact in fair and affordable housing, including funds to preserve and create affordable housing. It has so far distributed \$6 Million to over 160 nonprofits. The foundation awarded \$98 Million in grants in the 2022-23 fiscal year.</p>
Indianapolis	<p>The Lilly Endowment, a private philanthropic foundation created by the founders of the pharmaceutical business Eli Lilly and Company, supports programs that promote civic engagement, enhance safe and livable communities, and support the development of amenities that attract and retain residents and businesses.</p> <p>Among a range of areas of grantmaking including arts and culture, community economic development, and human service organizations, the Endowment helps ensure that Indianapolis is a safe and livable community. Some grantees in this area include Indianapolis Neighborhood Housing Partnership, Local Initiatives Support Corporation Indianapolis (LISC), and Indianapolis Neighborhood Resource Center (INRC). In 2023, the Endowment utilized \$2 Billion in program and support services, including \$1.5 Billion in grants, \$488 Million of which were dedicated to community development grants.</p>

Source: SGS Economics & Planning, 2025

Goal 2.4.3: National Partner Potentials

When looking at how other cities grapple with housing issues, one hallmark of a well-developed system is the integration of a diversity of partners. Although Oklahoma City engages actively with an array of traditional partners, it does not yet engage with a national partner. In the context of addressing affordable housing issues, national partners often work with communities on technical assistance, capacity building, and enhancement of local access to capital.

For capacity building, such partners offer trainings and certifications to improve organizational capabilities in areas like project development, financial management, and community engagement. In terms of capital access, some national organizations (such as CDFIs like LISC or Enterprise) can provide funding mechanisms like grants, loans, and access to new capital. As discussed further in **HAIP Appendix E**, capital from national partners can often be secured through a variety of sources (or can help secure additional sources), including NMTC, LIHTC, grants, loans, philanthropy, or private and institutional equity investment.

In this series of actions (building on conversations initiated during the HAIP process), the City has an opportunity to frame the needs, criteria and principles for engaging a potential national partner.

Identify System-Wide Capacity, Skills, and Resource Gaps

In this action, the City will assess capacity, skillsets and needs across the housing system, which will assist in developing a clear case for how and why a national partner may be beneficial.

- **What are the skills and resource gaps?** This includes identifying needs in the system that cannot be filled by existing or emerging partners. As an example, while conversations during the HAIP process with OCHA explored how key skillsets and resources might be leveraged scaling production or preservation goals, it was determined that no additional staff capacity would be available for additional efforts (over the next 5 to 10 years) until projects related to MAPS4 were completed. Documenting similar limitations across all partners will be instrumental in framing gaps that could be filled by a national or emerging local/regional partner. This might include gauging the extent to which such limitations are temporary or longer-term. This will assist in determining how to best employ one-time technical assistance and/or ongoing support.
- **Which skills and resource gaps are a priority and when should they be filled?** Once resources and gaps are understood, the City will be in a better position to prioritize which skills to fill, how, and when. For example, bringing on a certain type of national partner could mean that objectives might be met simultaneously for housing funding, financing, and delivery, as well as training and certification for capacity-building and upskilling for existing staff.

Defining a Potential National Partner's Role

As with framing the roles and responsibilities for the PHP (see **HAIP Section 2.2** on page 34), the City should develop a list of roles and responsibilities that a national partner might play based on the understanding of what is missing and needed for:

- **Upskilling and capacity-building:** This could include a wide variety of assistance to the City (internally) and its partners (externally), services which often include certification training for disciplines like development finance, contract management and compliance, and administration.
- **Specialized expertise and technical assistance:** Some national partners bring a specialized depth of experience in certain programmatic applications, like HUD RAD program, or the conversion from the Section 9 housing assistance program to Section 8.
- **Policy and Program design:** While there is guidance for implementing scaled programs and policies in this HAIP, the City will need to design tailored structures for each of the new or expanded programs, such as major/minor rehab, affordable rental rehabilitation.
- **Procurement process support:** This may involve assistance internally to the City or with its existing partners in the design or redesign of RFPs, contracts, terms and conditions.
- **Contract management:** Some cities engage their national partners in very task-oriented or administrative functions such as contract development, monitoring and compliance.
- **Access to capital or resources:** Access to outside capital (debt or equity) for affordable housing investment purposes; Access to outside network that could be leveraged to gain access to outside capital.

- **Community engagement:** Some cities leverage the unique skillsets of their national partner individuals (locally- or nationally based) for broad community or stakeholder educational purposes.

TABLE 12: TARGETED COMMUNITY AND STAKEHOLDER CAPACITY BUILDING

Group	Possible Educational Efforts
Housing Industry	<ul style="list-style-type: none"> ▪ Commercial finance literacy ▪ Affordable housing finance literacy ▪ State and federal grant and loan options and processes ▪ Compliance and contracting
Housing Beneficiaries	<ul style="list-style-type: none"> ▪ Household financial literacy ▪ Budgeting ▪ Tenant rights and limitations
General Public	<ul style="list-style-type: none"> ▪ Continued education on housing affordability issues ▪ Broad education on development decision-making and community need
Decision-Makers, City Staff and Partners	<ul style="list-style-type: none"> ▪ All of the above ▪ Periodically bringing groups together for insights

Source: SGS Economics & Planning, 2025

Funding Options for National Partner

Options for funding a national partner include:

- **An annual contract for standard training program and technical assistance:** This type of engagement is based on the number of participants and the type of assistance needed. The training products and content are standard across the providers and are tailored to local conditions. The contract can be renewed or revised each year as needs evolve. Based on interviews with other cities and program providers, this type of service may cost in the range of \$100k to \$200k or more per year.
- **A tailored engagement for deeper consulting:** This type of engagement is focused on consulting with decision makers and partners about policy and program scenarios and development. This service can be project-based with a fee or included in the scope of an annual commitment described above.
- **Capital Resources and Expansion of Partnerships:** This type of engagement includes the partnering and leveraging of resources across community groups / developers, with local government and specialized investors. National partners offer a range of deal structuring and financing expertise for rental and owner products targeting deeply affordable, mixed-income and workforce needs. Examples of their products include access to debt and equity for acquisition and rehabilitation of multi-family properties and seed money for a community land trust (CLT).

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3. Stage 2: Policy and Program Development

The second stage of the Implementation Plan outlines actions for the City related to policies, programs, and mechanisms for delivering affordable housing solutions. Following the priority setting of the previous stage, this is focused on:

- Developing and ensuring efficiency in development processes
- Expanding existing programs to meet scaled needs
- Establishing and exploring new programs
- Clarifying priorities and the City's role in ongoing legislative improvements

It should be noted that the sequence and specifics of goals and actions outlined in **Table 13** below may change based on the outcomes of the priority-setting actions in the previous stage.

TABLE 13: SECOND STAGE OVERVIEW

Goals	Actions
3.1 Development Process Efficiency and Actions	
Goal 3.1.1: Improve Development Review Processes	<ul style="list-style-type: none"> ▪ Assess and Refine Development Review and Permitting Processes
Goal 3.1.2: Improve Development RFP Outcomes	<ul style="list-style-type: none"> ▪ Review Key Content Requirements ▪ Review and Align Processes and Timing ▪ Review and Refine Key Evaluation Criteria
3.2 Existing Program Evaluation and Expansion	
Goal 3.2.1: Expand Major/Minor Rehab Program	<ul style="list-style-type: none"> ▪ Define Structure for an Expanded Major/Minor Rehab Program
Goal 3.2.2: Expand DPA Program	<ul style="list-style-type: none"> ▪ Define Structure for an Expanded DPA Program
3.3 New Program Establishment	
Goal 3.3.1: Develop Scaled Affordable Housing Rental Rehabilitation Program	<ul style="list-style-type: none"> ▪ Define Structure for an Affordable Rental Housing Rehabilitation Program
Goal 3.3.2: Establish a Revolving Loan Fund (RLF)	<ul style="list-style-type: none"> ▪ Define Structures and Roles

Goals	Actions
Goal 3.3.3: Explore the Establishment of a Community Land Trust	<ul style="list-style-type: none"> Define CLT Mission and Outcomes Delineate Roles in Operationalizing CLT
3.4 Ongoing Regulatory Improvements	
Goal 3.4.1: Code Modifications	<ul style="list-style-type: none"> Implement Local Land Use and Development Code Modifications
Goal 3.4.2: Define Priorities Impacting Landlord-Tenant Relations	<ul style="list-style-type: none"> Define City Priorities for Improving Landlord-Tenant Relations Define City Role in Efforts Requiring Legislative Improvements
Goal 3.4.3: Align with Strategies to Address Homelessness	<ul style="list-style-type: none"> Define Priorities and Opportunities to Align Housing and Homelessness

Source: SGS Economics & Planning, 2025

3.1 Development Process Efficiency

The first part addresses a key issue raised in the HAS; one that is fundamental to building a system that reliably delivers housing. Development process efficiency is critically important in the context of existing program expansion or new program establishment.

Goal 3.1.1: Improve Development Review Processes

Focus group participants and stakeholders in the HAS Advisory Group pointed to inefficiencies and challenges with the City's multiple development review processes. Examples were made of processes that favored greenfield development (and that were poorly suited to infill projects). Other examples highlighted problems with length of review time, unpredictability of timing, and the perception that anything "out of the ordinary" would be pushed to the Board of Adjustments, protracting project timelines and impacting cost structures (counterproductive and a risk to development).

Assess and Refine Development Review and Permitting Processes

The HAS included a high-level review of peer city responses to such concerns. Recommendations (**HAS Section 7.3.6**) for assessing these processes and improving on them cited the importance of maintaining and/or enhancing predictability and efficiency across all development-related review and approval (or inspection) processes. Recommendations also pointed toward conducting a developer sentiment survey periodically to understand, refine and continuously improve City processes.

Following the HAS, the City issued a Request for Proposal for a consultant to conduct a comprehensive analysis of the private development review and permitting process, which involved multiple City

departments. The consultant was engaged in June 2024 and the work is slated for completion by early to mid-2025. The City's Office of Innovation is leading the process improvement engagement with the Development Services Center. Still underway at the time of this writing, the report is scoped to identify current conditions, benchmarks for best practices and recommendations across these themes:

- Process Continuity
- Holistic Process Management
- Service Level Expectations
- Customer Service
- Technology

Goal 3.1.2: Improve Development RFP Outcomes

Beyond development review, permitting and approvals, developers engage with the City through RFPs. Recommendations were made in the HAS around strengthening such processes, particularly as they relate to development of publicly-owned land (discussed previously in **HAIP Section 2.3** on page 41). In these actions, the objective is to improve efficiency and predictability.

Review Key Content Requirements

Through the HAIP process, sample RFPs were collected from a few peer cities (Dallas, Austin³⁷, San Antonio, Charlotte³⁸) to identify key components and content requirements the City might consider. Such a process might involve the City, the PHP, and the Advisory Group convening relevant entities to review and assess RFP structures, identify similarities, differences, and the extent to which gaps or opportunities for alignment might exist. The purpose is ultimately to ensure alignment across content requirements (from applicants) for processes with similar intended outcomes, such as:

- **Basic content:** This will include background information, a clear scope of services, defining proposal submission requirements, documentation of applicant experience and history, not-for-profit status, veteran-, SBE or M/W/DBE status, and/or any local business requirement.
- **Evaluation criteria:** This may include articulation of objectives, including identification of minimums and competitive or preferred criteria (discussed more below).
- **Project-specific content:** This may include information such as a gap, grant or loan request amounts, documentation of project pro forma, capital sources and uses, pre-commitments, underwriting review, development program specifics such as design, affordability levels, location, amenities, services, displacement prevention strategies and protections (e.g., temporary resident relocation plan).

³⁷ <https://www.austintexas.gov/page/request-proposals>

³⁸ <https://www.charlottenc.gov/Growth-and-Development/Doing-Business/Contract-Opportunities/Economy-Inn>

Review and Align Processes and Timing

Following initial review, the next action would elevate attention to procedural and timing elements of such processes, working with partners to clarify:

- **Frequency:** Too many divergent funding rounds may be counterproductive or ineffective. With an understanding of when and how frequently different agencies are releasing RFPs for development will be important to build consensus on a best practice moving forward. This could also include an assessment and alignment around local, state and federal funding rounds. For example, the City might coordinate a notice of funding availability (NOFA) process around OHFA or HUD timelines (e.g., every 6 to 12 months or defined period to provide predictability for the industry).
- **Lead times:** This may also include identifying adequate lead times for RFPs. HAS recommendation 7.2.3 focused on building and increasing smaller-scale developer capacity in the context of infill development. It is important to note that capacity in this group of developers may be insufficient for timely responses to RFPs with tight deadlines.
- **Application process:** Work with IT Department regarding the use of web-based platforms for applicant submission of materials, including consistency of documentation requirements and other criteria.

Review and Refine Key Evaluation Criteria

While some of the City's partner agencies may need to maintain different evaluation criteria, the purpose centers around reviewing and refining the central aspects of RFP evaluation and scoring criteria. At a high level, this should draw attention to:

- Minimums or threshold criteria
- Preferred and competitive criteria

While not an exhaustive list, this focuses on elements related to avoidance of unintended outcomes and facilitation of development outcomes that better align with needs and goals, such as:

- **Affordability:** As discussed in **HAIP Section 2.3** on page 41, clear guidance should be given on affordability requirements, as well as opportunities for use of incentives versus requirements. This may need to be informed by market and economic analysis related to development potential.
- **Place-based:** While projects using federal dollars are often required to be located in a qualifying Census tract (QCT) and/or located in proximity to services or transit (for example), the broader view for the HAIP is that **planokc**, the HAS, and the HMS all included analyses that drew attention to housing, neighborhood amenities, and infrastructure at a spatial level. For that reason, incorporation of such criteria might translate to metrics, such as distance to transit, grocery, amenities, assessed area of need, etc.
- **Value-for-money:** The City's partners are likely to have different views on this, but seeking agreement on common criteria would be important to convey to the industry what metrics are considered important. This could include metrics like cost per unit, leverage per unit, or even documented cost-benefit.

- **Pre-commitments:** As heard through both the HAS and HAIP processes by industry stakeholders and practitioners, pre-commitments can represent a major hurdle for applicants but also a major risk for the City. Where an RFP relates to the availability of a grant or subsidy for development, the City and its partners need to carefully consider the extent to which pre-commitments are required – that is requiring projects to already have other sources committed such as LIHTC equity allocations or letters of intent (LOI). On one hand, requiring developers to have other sources of funds secured may be a barrier to building developer capacity in the system. On the other hand, not requiring developers to have secured funding may result in funds being reserved or encumbered for projects that suffer extended delays, or never come to fruition, meanwhile limiting their use in other viable projects.

At the conclusion of this action, the City would publish and make available revised evaluation criteria. This could be done in a manner similar to how housing finance authorities (HFA), like OHFA, publish and frequently update their Qualified Allocation Plans (QAP), outlining a set of threshold and selection criteria for applicants seeking LIHTC equity.⁴¹ Other examples include when cities publish Notices of Funding Availability (NOFA) using local dollars with a clear outline of evaluation criteria and scoring processes.⁴²

3.2 Existing Program Evaluation and Expansion

Because the scale of affordable housing need far exceeds resources and structures currently available, scaling an approach (through expanded programming) will require additional financial resources. While it may be possible to blend federal and local funds for some purposes, if the City chooses to do so, it should do so knowing that such restrictions may become default terms and conditions on use of local dollars. As such, any new or expanded program design should consider whether, to what extent, and how funds might be isolated for specific purposes and/or programs.⁴⁴

Goal 3.2.1: Expand Major/Minor Rehab Program

Define Structure for an Expanded Major/Minor Rehab Program

HAS focus group and Advisory Group participants highlighted a need for more investment in existing inventory, particularly in the central neighborhoods. Targeting this and the quantified housing repair needs (HAS Chapter 5), HAS Section 7.2.1 recommended exploring the expansion of the City’s federally-funded major/minor rehab program.

Currently, the City’s program (funded through federal funds) yields between 45 and 60 rehabs per year, including whole-house rehabs and exterior rehabs. While there are also an additional 45 to 50 homes per year that receive emergency repair assistance (also through federal dollars), neither the City’s current

⁴¹ <https://www.ohfa.org/wp-content/uploads/2024/07/2025-QAP-Draft-7.16.2024.pdf>

⁴² <https://dallascityhall.com/departments/housing-neighborhood-revitalization/PublishingImages/Pages/Notice-of-Funding-Availability-NOFA/2024%20NOFA%20Final%20%282024%29.pdf>

⁴⁴ **Appendix G** and **Appendix H** provide examples of scaled programs administered by the City of Dallas in which program uses of local dollars are different from program uses of federal dollars.

program structure (or resources) are adequate to address the scale of need. In scaling the output of the City's major and minor rehab program, the following considerations could be made:

- **Delivery models:** Whereas the current model simply reflects HUD criteria (i.e., for what purposes grants may be used), a scaled program funded through local dollars might open funds for a broader array of uses. **HAS Section 5.2** identified numerous rehab needs, such as broken or drafty windows, roof repairs, and the need for foundation work.⁴⁵ Practitioners and stakeholders also pointed to a potential need for unique program responses, such as disaster relief. The City might also contemplate structuring a program that responds to different delivery pathways, such as a rehab undertaken by the homeowner vs. a rehab undertaken by a non-profit entity in the process of acquisition, rehab and resale. This flexibility might lend itself to facilitating the functions of a CLT, discussed later. As other cities have done, Oklahoma City would delineate its program terms and conditions by resources used (i.e., City vs. HUD).
- **Household eligibility:** As federal program dollars can only be spent on eligible repairs, dollars can also only be accessed by a limited group of beneficiaries (households with incomes up to 80% AMI). In scaling up a broader program, the City might consider tiering funds available and/or possible loan forgiveness portion by income level. In the case of grants, for example, lower income households could be offered grants, while higher income households might be eligible for low-interest loans. (The City should keep in mind the financial performance of its existing rehabilitation program loans when crafting eligibility terms and conditions for an expanded program.)
- **Liens:** Generally, forgivable grants (through rehab as well as DPA programs) are offered in exchange for a property owner maintaining or establishing required residency timelines and/or affordability levels. In some cases, owners are required, enforced by mortgage liens, to maintain a property as their principal place of residence. Such liens are generally put in place to ensure compliance with program objectives, but specifically to deter unintended consequences. Contract deterrents typically include full repayment of grant dollars.
- **Geographic applicability:** Recommendations in **HAS Section 7.2** also referenced the analysis of community survey data (see **HAS Section 5.2**), which indicated a concentration of housing repair needs in specified neighborhoods, e.g., Central (6) and Northeast-Urban (7). If new local dollars are limited, the City could consider piloting a scaled form of the major-minor rehab program in these neighborhoods first.
- **Achievable targets:** Once it is understood what local financial resources are available (within a certain planning horizon), the City should identify reasonable targets for delivery and build them into a tracking and monitoring format (see discussion in **HAIP Section 2.1** on page 28).
- **Partner coordination:** This set of considerations may involve working with partners such as a custodian bank (if one is used to manage the RLF) to define realistic grant vs. loan-making provisions in an expanded program to manage risk of fraud or abuse and other risks, such as default. It may also involve

⁴⁵ While the largest problem category was “major repairs”, there were also significant portions of residents identifying floors or foundation being uneven or damaged, broken or draft windows and plumbing problems.

working with partners to understand to what extent staffing resources or skillsets may or may not be needed to supplement program activities.

- **Financial planning:** This would generally involve developing a business plan and operational model for the program, considering factors such as the anticipated uptake of the program (demand) by AMI levels, options for tiered repayment factors, and how and when funds would begin coming back in. The purpose would be to document the financial sustainability, or at what point the program would reach stabilization, such that additional local dollars would not be necessary to maintain it.
- **Program compliance:** To ensure needs and goals are being met (and lasting), the City will need to establish monitoring and/or compliance checks related to key programmatic intents, such as affordability levels or occupancy requirements, for example.

Additional considerations for the administrative requirements and costs associated with scaling this program are provided in **HAIP Appendix G** and **Appendix H**.

Goal 3.2.2: Expand DPA Program

Define Structure for an Expanded DPA Program

The **HAS Section 7.2.2** also recommended expanding the City's current DPA program (also funded through federal dollars). However, the recommendation was also to utilize a local resource. In exploring the expansion of this program, the City should consider any intersections with other programs, such as OHFA, which has a variety of income-qualified DPA programs. And because most of these programs struggle with uptake, the City may wish to take a staged and strategic approach to scaling such a program:

- **Stage 1:** Invest in community education, including directly or indirectly (with a partner) supporting homebuyer and financial literacy counselling and education. A common challenge cities face is that residents and potential beneficiaries are often unaware of the resources and tools available to them. Through broader education, such as leveraging neighborhood association contacts, the City will develop a better understanding of the extent to which a scaled program may be useful and the extent to which it should be scaled.
- **Stage 2:** Following on groundwork to raise awareness that such a resource is available, the City may wish to think about the best fit for use of a DPA program. The **HAS Section 7.2.2** recommended focusing on minority neighborhoods in which loan denial rates are highest, aligning this tool with a CLT model, or even shared-ownership or shared-equity models.

3.3 New Program Establishment

The third part looks beyond the City's current policies and programs to solutions that require new structures. In this set of actions, the City will:

- Develop a scaled affordable rental rehabilitation program
- Establish a Revolving Loan Fund
- Explore the establishment of a Community Land Trust (CLT)

Goal 3.3.1: Develop Scaled Affordable Housing Rental Rehabilitation Program

Define Structure for an Affordable Rental Housing Rehabilitation Program

With federal funds, the City has contributed subsidies to various rental rehab projects ranging from large LIHTC projects to small acquisition rehabilitation projects that encompass only a few units. However, the City does not have a program that more makes funds available to landlords for broader rehabilitation activities. Although funds for LIHTC rehabilitation projects like the 4% and 9% tax credits may be locally available, they are limited (as discussed in **HAIP Section 2.1** on page 20) and insufficient to address the scale of identified needs. For smaller scale projects, landlords may not have access to capital for needed rehabilitation and may have only limited resources to repay funds in a timely manner.

Per the **HAS Section 7.1.2** recommendations, the City should consider a possible rental rehabilitation program, with first steps to define applicability, uses, eligibility, etc. As a phasing or implementation consideration, however, the City might first target one or two demonstration projects with local landlords to 1) generate interest the market and 2) model that the program can be effective.

- **Project applicability:** As documented in the HAS, estimates of rental rehabilitation needs are substantial and they relate primarily to the supply of non-subsidized inventory (those that do not require tenants to income- qualify). Such inventory is typically characterized as “naturally occurring affordable housing” (NOAH). The City may want to explore its options to preserve post-rehab affordability through agreements with property owners, liens or deed restrictions.
- **Eligible uses:** **HAS Section 5.2** identified needs for major and minor repair across the city’s rental inventory for a variety of problems. The largest segment of need was identified as minor repairs (an issue that could in part be mitigated by the recent legislative advancement discussed in **HAIP Section 1.2** on page 20, followed by major repairs and problems with broken or drafty windows. Programmatically, this may also be an opportunity for the City to first pilot and then later scale a multifamily rental rehabilitation loan program that is tailored to any of the above minor or specific issues.
- **Applicant eligibility:** **HAS Section 7.1.2** specifically recommends the City initially target program eligibility to local landlords. The HAS cited several examples that could be used as a guide, such as Tulsa’s (OK) Gold Star Landlord Program.⁴⁷ As contemplated for the Implementation Plan, the intent is to target naturally-occurring affordable rentals and focus resources on properties that are in greatest need of rehabilitation (e.g., those that currently do not meet minimum habitability standards). The City will want to carefully assess the distribution of households by income in these projects to minimize displacement or cost-burden risks.
- **Geographic applicability:** As with the previous action to design an expanded major/minor rehab program from ownership housing, the recommendations in **HAS Section 7.1.2** also referenced the analysis of community survey data, which indicated a concentration of housing repair needs in specified neighborhoods, e.g., Central (6) and Northeast-Urban (7). Similarly, if new local dollars are

⁴⁷ <https://partnertulsa.org/gold-star-landlord-program/>

limited, the City could consider piloting a scaled form of the major-minor rehab program in these neighborhoods first.

- **Funding availability:** In scaling the appropriate funds made available for projects, the City will want to understand: 1) range of units in a typical structure; 2) range of per-unit rehabilitation costs for the range of rehab needs identified; 3) total funds that might be encumbered by a project; 4) the number of projects that could be supported per year. From there, the City could confirm the range of per-unit funds available for rehab projects, as well as identify potential tiers of funding available based on affordability terms. Additionally, under a set of circumstances where funding resources are more limited (as discussed previously with **Table 8** on page 31), the City may also wish to consider the use of property tax rebates, as recommended in **HAS Section 7.1.2**.
- **Reporting requirements:** The intent of leveraging local dollars is to inject more flexibility into the system to address nuanced local needs than available through traditional sources. However, to ensure that rehabbed rental properties are kept within terms of “affordability”, the City will need to define eligibility, certification, etc. reporting standards that may increase administrative requirements for owners, operators and City staff.
- **Temporary tenant relocation:** For projects that are fully or mostly occupied, this may be one of the more significant practical challenges to program up-take. It may be worthwhile to gather information from stakeholders and property owners on typical tenant cycles, rates of unit turnover, levels of occupancy and whether over a 5- to 10-year period, a complete rehab of a rental property could be achieved without resident displacement. However, as discussed in **HAIP Section 3.1** on page 53, the City can build into RFP submission requirements elements like Displacement Mitigation, Temporary Relocation Plans, and Resident Protections.
- **Program compliance:** As with this consideration in the expansion of existing programs, the City will need to identify how it can ensure and document that program goals are being met. This will require a determination of not only when or whether liens are used in the process of granting awards for rehabilitation, but also how monitoring and/or compliance will be undertaken.

More broadly, the City should consider:

- **Achievable targets:** Once total new local financial resources have been identified, the City should identify reasonable targets for delivery and build them into a tracking and monitoring format, as discussed in the next stage.
- **Partner coordination:** This consideration is the same as discussed under the Expanded Major/Minor Rehab Program, including how other financial or production partners interact with the program, as well as how staffing resources are shared. In the case of this new program, though, it will be important to consider how best to utilize expertise the City currently has in-house, such as: development finance and construction expertise; contract management and compliance; legal services; and tenant services.⁴⁸

⁴⁸ Through process of developing this HAIP, it was understood that OCHA, the City’s local partner that does have this in-house expertise, will be at capacity with its MAPS4-funded projects for the next 10 years. This places pressure on the PHP, existing HCD staff, and the City’s partners including the Alliance and OCEDT. It elevates

An abbreviated example of eligibility, loan terms, loan conditions and affordability requirements for the City of Dallas’ Substantial Rehabilitation Program (for rental properties) is provided in **HAIP Appendix K**.⁴⁹

Goal 3.3.2: Establish a Revolving Loan Fund (RLF) for Housing

The cost of capital, among other factors, can be a significant barrier to affordable housing development. For this reason, low-interest financing offered at scale as a source of capital for projects can make a meaningful impact on outcomes. A mechanism that many communities have used to make lower-cost debt available to commercial and individual borrowers is a revolving loan fund (RLF). RLFs can be funded through single or pooled resources like bond issues, philanthropic or business community contributions, local allocations and even federal dollars (although the incorporation of HOME or CDBG program dollars may complicate usage, tracking and reporting requirements).

The City does currently administer two RLF structures – one for brownfields redevelopment (using periodic allocations of federal EPA dollars) and another (Murrah District RLF) for economic development.⁵⁰ Yet, while they represent how an RLF functions, they do not represent the scale or usage recommended in **HAS Section 7.3.1**. That recommendation was specifically aimed at structuring a scaled local resource for use city-wide for housing production, rehabilitation and preservation. A few current examples of the type of program contemplated are shown in **Table 14**. This action is also linked closely with **HAIP Section 2.3** on page 37.

TABLE 14: REVOLVING LOAN FUNDS IN PEER CITIES

City	Revolving Loan Funds
Atlanta, Georgia	<p>Atlanta has several different RLFs, some of which support small businesses. Two, however, are used for housing-related activities - the Brownfield RLF (BRLF) and the TOD Fund. The BRLF is co-managed by the City of Atlanta and Invest Atlanta, and like Oklahoma City’s BF RLF provides financing (through allocation of EPA dollars) to brownfield mitigation and redevelopment projects.</p> <p>The TOD Fund, on the other hand, has \$15 million from the City’s Housing Opportunity Bond, Enterprise Community Loan Fund and the Low-Income Investment Fund, and is administered by Invest Atlanta.</p>

attention, however, to the importance of the role that a national partner could play. As discussed in Milestone 3, Outcome 1 (page 26), an optimal national partner would immediately bring the necessary expertise but also the ability to train, upskill and potentially certify staff or partners to maintain such administrative and management needs over time.

⁴⁹ https://www.dallascityhall.com/departments/housing-neighborhood-revitalization/Documents/Dallas%20Comprehensive%20Housing%20Policy_082620.pdf

⁵⁰ <https://www.okc.gov/departments/planning/financial-assistance/commercial>

Charlotte, North Carolina	Charlotte's Housing Trust Fund was established in 2001 and is funded by voter-approved housing bonds, the most recent of which was a \$50 million bond approved in 2022. The Fund is administered by Housing & Neighborhood Services' division and provides funding and financing for affordable housing developers. Over time, the Fund has allocated more than \$218 million, with project loans as large as \$5 million.
Arlington County, Virginia	The County's Housing Division administers the Affordable Housing Investment Fund (AHIF), a revolving loan fund created in 1988. It provides low-interest loans for new construction, acquisition and rehabilitation. Eligibility criteria require that other funds will be leveraged and that affordability terms are maintained for at least 30 years, with preference given to terms of 60+ years. As an indication of scale, the County allocated approximately \$14.5 million in FY2024.
Omaha, Nebraska	Following the recommendations from a regional housing needs study ⁵¹ , Front Porch Investments (FPI) was formed in 2022. The same year, the City received \$112 million in ARPA dollars. With a specific focus on producing and preserving affordable housing through the City's Development and Preservation Fund, FPI was seeded with a \$20 million grant from the City and matching philanthropic dollars, as well as an additional \$20 million in Section 108 funds from HUD. FPI's website indicates that more than 1,500 units will be developed or preserved through this partnership, utilizing short- and long-term loans, as well as grants. ⁵² To date, more than \$33 million have been awarded in construction loans and grants. ⁵³

Source: SGS Economics & Planning, 2025

Define Structures and Roles for a Revolving Loan Fund

Regardless of where funding comes from, dollars will likely need to be held within a trust, such as OCEDT, and/or a custodian bank. This will require the City to explore and identify appropriate administrative and management structures, including:

- **Eligibility and fund usage:** Central to the design of an RLF structure is its usage, the City should identify and define: 1) types of funding opportunities available (e.g., grants, loans, etc.), 2) eligibility and borrower qualifications (e.g., income levels) and qualified or intended use of funds (e.g., infill development, smaller-scale affordable rental or ownership projects, preservation or rehabilitation, major/minor repair, etc.), 3) terms of repayment and/or loan forgiveness by program usage (e.g., production, preservation or rehabilitation and/or by income level), and 4) any limitations on layering of other funding sources, such as federal program dollars.

⁵¹ <https://omahafoundation.org/wp-content/uploads/2021/05/Housing-Affordability-Assessment-of-Needs-Priorities.pdf>

⁵² <https://www.planning.org/planning/2024/jul/omaha-leverages-public-private-partnerships-to-increase-housing-supply/>

⁵³ <https://frontporchinvestments.org/news/news.html/article/2024/06/06/spring-2024-over-6m-awarded-through-fourth-funding-cycle-of-development-and-preservation-fund-for-affordable-housing>

- **Fund administration and management:** Noted above, funds will need to be managed and/or held in trust. Given current understanding, it is unlikely that an RLF could be managed by OCEDT without additional capacity. An alternative preliminarily investigated through the HAIP process was a custodian bank. A bank would bring administrative capacity, as well as potential synergies with other commercial lending products. Regardless of the administrative entity, the City will need to define these necessary functions, including: 1) types of products available; 2) application and underwriting processes; 3) management and monitoring processes; and 4) metrics of RLF viability such as cash flow, loan fund balance, portfolio quality and reserves. As a note to the scale of administrative cost for such purposes, local resources like housing bonds in other cities often set aside between 5% to 10% for administration.⁵⁴
- **Contract management:** Following the City's initial project and eligibility review and development of an agreement with a beneficiary, further administration will be needed for contract management. This may include a set of tasks that current staff or a custodian bank might be able to wrap into its fund management and administration. Alternatively, there may also be tasks that could be outsourced to another third-party partner.
- **Contract compliance:** The complexity of compliance and affordability requirements are important considerations in developing program design. Compliance activities include such factors as review of any required documentation or reporting, monitoring of timelines and scope of work details, and periodic inspection of construction activities. Compliance review and monitoring can be resource intensive and is an important consideration that should be balanced against the need to achieve critical program goals of developing quality units that meet habitability standards and ensuring extended affordability.

Another important consideration for the administering entity will be having appropriate customer service and interface. In selecting an appropriate organization, it will be important to consider how such an entity manages across programs that work with individual and commercial borrowers.

Goal 3.3.3: Explore the Establishment of a Community Land Trust (CLT)

The subject of land banking and land trusts has emerged in a variety of strategic plans over time. In 2008, the City's Core-to-Shore Plan recommended creating a public or land trust structure to operate as an independent agency with authority to acquire land, develop and maintain long-term leases. In 2016, land banking arose in the City's Report by the Abandoned Building Coalition (2016), which highlighted legislative fixes needed to enable this power for the City.⁵⁵ A few years later, the subject emerged with the suggestion

⁵⁴ Admin funding from GOLT is limited at less than 2% (for accountants, attorneys, as well as support to OCEDT for FTEs), whereas admin funding from TIF is capped at 5%. Furthermore, it was noted in conversation with OCEDT that the preferred model of funding administrative costs in the context of managing trust dollars is to source them from the General Fund but "charge back" to TIF or GOLT.

⁵⁵ As noted in the HAS, some of these legislative fixes were identified as: receivership authority, definitions of vacant or abandoned buildings, foreclosure authority, and the establishment of a housing trust.

that a CLT (for affordable housing purposes) might be created within the Innovation District, though the current Land Use Plan does not mention it.⁵⁶

More recently, the **HAS Section 7.2.4** recommended exploring the creation of a CLT to support and sustain affordable homeownership. Findings in the HAS drew attention to a few driving forces behind the CLT idea. One was the concern that the barrier to entry for homeownership was becoming unattainable for a growing portion of the population. Another was a concern among the development industry around unforeseen infrastructure and construction cost challenges when pursuing infill development (particularly for affordable housing developments).

Given its history and the contexts in which the idea has been floated, the purpose here is to define the function and purpose of a CLT, identify criteria that might qualify an existing organization to function as such an entity (noting that the City is unlikely to operate a CLT itself), and collectively map out how a CLT might be operationalized.

Define CLT Mission and Outcomes

This process could be approached with or without a national partner⁵⁹, using case studies and examples of CLTs in practice. Such a process could include defining:

- **CLT purpose and mission:** At a high level, the starting point for the City and its partners might be to articulate the vision and broader purpose for establishing a CLT. This might entail revisiting or giving more clarity to overarching objectives, such as: 1) capturing value of public investment for long-term community benefit; 2) acquiring and developing land for the purpose of affordable housing development; 3) maintaining and preserving opportunities for affordable homeownership to individuals and households who may be marginally locked out of the market now and in the future; 4) facilitating long-term ownership and wealth-building opportunities..
- **Criteria for eligibility:** Following that is an exercise to identify and define what type of organizational features would be appropriate for a CLT entity. With the understanding that the City, the PHP and the Advisory Group will be casting its sights toward existing (or emerging) local and regional partners as candidate organizations, this action might include consideration for: non-profit status (or is not controlled by a for-profit entity), ability to acquire and develop land, capacity to own and operate developments, its track record with relevant developments, and its staff capacity and skillsets. Further consideration could be given to the geographic reach of its activities or the structure of its governing board.
- **Legislative authority:** Although this fits largely into a component of the eligibility criteria above, particular attention could be given around whether and to what extent legislative barriers exist for a

⁵⁶ <https://www.okc.gov/departments/planning/what-we-do/plans-studies>

⁵⁹ An organization like Grounded Solutions Network (formerly the National Community Land Trust) has a track record for supporting communities as they structure new CLTs.

candidate CLT in acting on its intended functions, i.e., acquisition, land banking⁶⁰, development, owning and operating, etc.

- **Existing organizational alignment:** Although the appropriate organization might emerge from conversations organically, the establishment of criteria should shape a process in which conversations among the PHP, Advisory Group and others will elevate attention to what functions are essential for a CLT, which organizations might function effectively in such a role, what their further needs might be, and what needs to be done to operationalize them.

Delineate Roles in Operationalizing CLT

Though the City will likely play an indirect role in the operation of a CLT, it will have an oversight interest in processes and responsibilities that provides assurances for success. This series of steps could be completed in parallel with the previous action.

- **Inventory publicly held land in the City:** Working with partners, the City could lead an analysis (with the PHP and partners) to understand where publicly-owned lands are, scoring and ranking them in terms of access and proximity to employment, transit, amenities, infrastructure challenges, whether they are contiguous sites or scattered⁶¹, etc. As suggested in the HAS, Core-to-Shore or the Innovation District remain high opportunity sites for piloting a CLT.
- **Identify disposition potentials:** This might include a market-readiness study to understand which sites might be development-ready. Such an analysis would document market demand and supply conditions, infrastructure constraints, development opportunities, feasibility, etc. The assessment might also include an identification of resources for acquiring additional land, sources of funds or financing, etc. The output of this effort might be beneficial to the goals of the HAIP, including providing more clarity around RFP processes for the development of public land, as well as broader strategic planning.
- **Identify operational model:** One of the more significant challenges in operating any type of affordable housing inventory is the operational cost associated with a scattered site inventory. Depending on the findings of the assessments above, the City should support its potential CLT partner in identifying what an operational model would look like, including: operational cashflow, staffing and administration, along with a 5-year growth and development strategy, etc.

HAS Section 6.2 gave a brief overview of CLTs as a component of potential organizational infrastructure and provides more details on a few selected CLTs that were established in the past 4 to 5 years.

⁶⁰ Section 6.3.1 in the HAS summarized some of the statutory context of land banking in Oklahoma, the momentum that had been generated regarding what legislative changes were necessary to allow for receivership authority, revising the definition of abandoned building, granting foreclosure authority and the possible establishment of a Housing Trust (although the latter is less important given the HAIP's focus on leveraging an existing organizational entity). Section 6.3.1 of the HAS also identified several examples of case studies where other states (Nebraska, Michigan and Texas) had land banking powers.

⁶¹ Most managers of affordable housing portfolios will point out that managing scattered sites is costlier and a less desirable policy outcome.

TABLE 15: COMMUNITY LAND TRUSTS IN PEER CITIES

City	Community Land Trust
Kansas City	<p>The Kansas City Community Land Trust (KCCLT) was launched in 2019 as the Marlborough Community Land Trust in the historically Black Marlborough neighborhood of Kansas City. KCCLT focuses primarily on acquiring and rehabbing foreclosed, vacant, and abandoned properties in Marlborough, rather than acquiring vacant land. To do so, KCCLT uses resources like the Missouri Abandoned Housing Act, which allows community groups to sue absentee landlords and acquire their properties, and the National Community Stabilization Trust, which helps nonprofits purchase foreclosed homes. KCCLT has recently started to purchase vacant land in the Marlborough area and construct new housing on its own. It also provides support for homeowners, such as mortgage assistance and connections with contractors.</p> <p>Initial support for KCCLT came from private grants and bank financing at low rates from community-minded banks. KCCLT also received mentorship and support during its incorporation process from Lawrence, KS CLT. Today, KCCLT utilizes a mix of public and private funding, including funds from HUD, CDBGs, city funding, and private grants.</p>
Columbus	<p>The Central Ohio Community Improvement Corporation (COCIC) and Central Ohio Community Land Trust (COCLT) have created a unique model to promote affordable homeownership in Franklin County, Ohio. COCIC acts as Franklin County's land bank, acquiring vacant or foreclosed properties since 2012. In 2018, COCLT was created as a subsidiary of COCIC to develop affordable housing on land bank-owned property.</p> <p>COCLT offers income-restricted homes at affordable prices through a shared-equity model. Homebuyers own the dwelling, while COCLT retains ownership of the land. Upon selling the property, homeowners share 25% of the appreciated value with COCLT, ensuring continued affordability.</p> <p>As of 2021, the CLT had 38 owner-occupied homes, with 23 in the construction pipeline, throughout Franklin County. The COCLT is funded by the City of Columbus and Franklin County. The annual operating budget was estimated in 2021 as \$713,333 for COCLT and \$1,557,660 for COCIC.</p>
Detroit	<p>DREAM Community Land Trust (DREAM) is a Detroit non-profit that provides many services in the community, including a community land trust. Currently, DREAM owns 50 properties in Detroit, which are used for housing as well as community gardens, pocket parks, and community spaces. DREAM has rehabbed 15 homes on its properties as well.</p> <p>The Detroit Justice Center (DJC), a non-profit legal organization, is a "one stop shop" for Detroit-area CLTs that centralizes resources, legal advice, and administrative support in one organization. The DJC supported both DREAM and other CLTs during startup. In addition to providing administrative support, the DJC also secured an agreement with the City of Detroit to provide 20 parcels to CLTs at little or no cost.</p>
Denver	<p>Elevation Community Land Trust (ECLT) was launched in 2018 with nearly \$25 million in private investment in partnership with non-profits, including Gary Community Investments, Mile High United Way, the Colorado Health Foundation, Gates Family Foundation, Bohemian Foundation, and Northern Trust. Although most of the initial funding was from private</p>

City	Community Land Trust
	<p>sources, the ECLT functions as a public-private partnership and today has partnerships with state and local agencies. The Urban Land Conservancy also provided administrative and technical startup support to the ECLT and served as an incubator for the program.</p> <p>Today, ECLT's portfolio includes over 500 homes in 13 Front Range communities, including Denver, Boulder, Fort Collins, and Aurora.</p>

Source: SGS Economics & Planning, 2025; Economic & Planning Systems, 2025

3.4 Ongoing Regulatory Improvements

The fourth part of this stage looks at ongoing and future improvements to the regulatory and legislative environment, including:

- Ongoing zoning code modifications
- Defining priorities impacting landlord-tenant relations
- Aligning strategies to address homelessness

Goal 3.4.1: Code Modifications

This action is focused on ensuring alignment with the Development Codes Update process and responding to opportunities highlighted through the HAS community survey where respondents commented on community support for accessory dwelling units (ADUs) by right in specified locations, for example.

Implement Local Land Use and Development Code Modifications

While the Development Codes Update project commenced as the HAS was being completed, many of the HAS recommendations created points of connection between the two projects, oriented primarily around facilitating zoning-based solutions to affordable housing issues, including:

- Pursuing zoning modifications (particularly in central neighborhoods of the city), such as allowing ADUs by right
- Exploring the reduction of minimum home and lot sizes in specified central neighborhoods of the city
- Making updates to code language reflective of recommendations on fair housing issues from the Analysis of Impediments
- Assessing the effectiveness of bonus density incentives for downtown development

Table 16 below summarizes some of the status of this process and indicates a few opportunities for alignment with next steps.

TABLE 16: ALIGNMENT WITH DEVELOPMENT CODES UPDATE PROCESS

External Efforts	Alignment of HAIP Efforts
<p>Urban Medium and Urban Medium Multi-Dwelling</p>	<p>The new UM zones encourage a variety of development types, including mixed-use development, and guide density to appropriate locations while ensuring compatibility with adjacent and surrounding neighborhoods. The intent is to release updated drafts for public comment in 2025.</p> <ul style="list-style-type: none"> ▪ The timing should allow the City, the PHP and its partners to engage and provide feedback for the process. ▪ While this code modification does not specifically relate to affordable housing, it does have direct implications on streamlined development review processes for the overall housing system. <p>New UM-MD zones would also use “patterns” to accommodate cottage courts, townhomes, and apartment buildings ranging from 30 to 40 dwellings per acre. These patterns are also designated by adjacent street types, development, and proximity to transit.</p> <ul style="list-style-type: none"> ▪ Here also, the City should encourage stakeholders and partners to engage and provide feedback.
<p>TOD</p>	<p>New commercial zones are proposed to accommodate multi-dwelling uses with a general density range of 20 to 75 dwellings per acre, increasing to 95 dwellings per acre in TOD locations. Building height could be further increased if developed according to the City’s affordable housing policy (yet to be determined).</p> <ul style="list-style-type: none"> ▪ This component of the Development Codes Update process has clear implications for the HAIP. ▪ The City’s priority should be to ensure that permissible densities do not exceed what the market is willing to build. Among the lessons learned from numerous other cities is that density or height bonuses should not be given by-right, but as an incentive. ▪ While the process is unfolding currently, the City should do economic modelling to support what those densities by-right should be and how the incentives could be structured. Without this, the City risks giving away an important aspect of its economic leverage.

Source: City of Oklahoma City (2024); SGS Economics & Planning, 2025

Goal 3.4.2: Define Priorities Impacting Landlord-Tenant Relations

Define City Priorities for Improving Landlord-Tenant Relations

HAS focus group participants and the Advisory Group elevated attention to a variety of issues and legislative imbalances between landlords and tenants. **HAS Section 7.1.1** listed a series of local and state-level actions around promoting housing stability, improving habitability and access, improving landlord-tenant relations, and making resources available to both landlords and tenants in the process. As caveated elsewhere in the HAS, its recommendations did not represent an all-or-nothing strategy, but a menu of potential actions based on data analysis, research, and stakeholder engagement. It is the job of the Implementation Plan, however, to sort out which of these issues and potential actions represent priorities.

Noted in **HAIP Section 1.2** (page 20), the City is already participating and contributing to the HSC process, which is making progress on a set of prioritized actions. However, the City could further re-ground the HSC's (and its partners') efforts by drawing attention back to the breadth of issues and actions recommended in the HAS (and Analysis of Impediments). This might include a focus on priorities around:

- **Habitability goals:** Fundamental to promoting and enhancing tenant protections is the City's interest in establishing minimum habitability standards for rental properties. Focus group and advisory group participants raised concerns during the HAS process (refer to the **HAS Section 2.2**), and analysis of the community survey data elevated attention to the scale of the problem (refer to the **HAS Section 5.1.2**). To this issue, examples of habitability standards were provided in the **HAS Section 6.1.3** that could serve as the City's starting point for discussion as a participant in the HSC.
- **Accountability settings:** As outlined in case studies in the HAS, some peer cities have opted for licensing or registry style programs to ensure habitability standards are met. At their root, these programs represent one way that communities attempt to keep accountability at the center of landlord-tenant relations. The City could decide that there are other more appropriate ways to achieve this independent of the traditional licensing or registry programs.
- **Use of penalties:** Among the accountability settings commonly adopted is the use of penalties or fees. Fees and the process for licensing rental properties as used in many cities can be nominal but also perceived as a barrier. Some cities apply fees for such programs uniformly while others only apply them in situations of non-compliance.
- **Use of incentives:** Flowing from the establishment of habitability goals and a registry, and with the prospect of local funds available, the City could structure an incentives pilot that leverages (for a time-limited basis) local dollars to provide incentives (as low-interest loans, partially forgivable loans or grants) to landlords to make repairs or condition upgrades.
- **Publicly accessible information:** In tracking rental properties throughout their communities, some cities maintain internal databases, while others are made publicly available. In establishing such a program, the City would need to identify what type of information is important to create and maintain an environment of accountability and transparency to tenants while maintaining an environment of protection to landlords.

Define City Role in Efforts Requiring Legislative Improvements

The HAS (and AI) recommendations on improving landlord-tenant relations included local and state-level actions, but also highlighted where the City might take a direct versus indirect role. Again, the composition of the HSC and its partners mean that the City is already engaging indirectly, but as attention to broader priorities is given (through the previous action), the City's role in more local pursuits will need to be clarified. As an example, **Table 17** outlines considerations for defining the City's role in the collective HSC efforts.

TABLE 17: CITY ROLE IN EFFORTS REQUIRING LEGISLATIVE IMPROVEMENTS

Effort	Alignment with HAIP Efforts
Broad eviction reforms and efforts to modify anti-retaliation language in ORLTA	<ul style="list-style-type: none">▪ The City should maintain its indirect role (through the HSC) unless it is in specific collaboration with other cities like Tulsa.▪ The City might be better placed to contribute broadly to this cause by supporting capacity-building among those in the non-profit sector who are more directly engaging in providing services.
Broader ORLTA reforms	<ul style="list-style-type: none">▪ The City should identify what role it might play indirectly in the process of making progress toward adopting the Uniform Residential Landlord and Tenant Act (URLTA) 2015, which oriented around maintaining balance between duty to pay rent and landlord duty to repair.▪ This would also involve clarifying how the City might take direct action through local solutions that indirectly address the fundamental issues.
Eviction diversion and early settlement mediation	<ul style="list-style-type: none">▪ The City should clarify how it might play a direct or indirect role in (e.g., through the HSC) creating pathways to divert vulnerable renters from eviction (e.g., best practice research indicates that other cities in the issuance of local housing bonds have allocated dollars to eviction diversion programs to be administered by the non-profit community of providers).

Source: SGS Economics & Planning, 2025

Goal 3.4.3: Align with Strategies to Address Homelessness

Define Priorities and Opportunities to Align Housing and Homelessness Initiatives

HAS focus group participants and the Advisory Group raised a variety of concerns related to vulnerable populations. Ideas were discussed around unique partnership solutions, which became embedded in a diversity of HAS recommendations. As homelessness represents a real risk for vulnerable populations in a system that struggles to provide appropriate access, stability and protections, the Implementation Plan presents an opportunity to support and contribute to improvements across a variety of activities. In these actions, it will be important for the City to define priorities and opportunities to align three layers of action:

- **Homelessness prevention:** These are focused at stemming the tide of the newly homeless that include eviction diversion and bringing balance to landlord-tenant relations, as well as social services.
- **Homelessness support:** These are focused on social services and transitional solutions.
- **Housing solutions:** These are investments centered around transitional/shelter solutions and rapid rehousing.

Touching on several of these aspects are Key to Home (K2H) priorities for the next couple years, as summarized in **Table 18**. As the City works through this Implementation Plan, it will be of potentially greater importance for the City to ensure that alignment and coordination are maintained across the K2H initiative, HSC efforts, as well as those to expand existing programs or establish new programs.

TABLE 18: ALIGNMENT WITH EFFORTS AND STRATEGIES TO ADDRESS HOMELESSNESS

Key to Home Priorities (2024-26)	Opportunity for Alignment
Create a diversion program and one-time 90-day assistance fund	<p>This involves a one-time financial assistance fund to support individuals on the “front door” of the homeless response system. The goal is to help find safe alternative housing immediately rather than entering a shelter or experiencing unsheltered homelessness. Diversion is intended to ensure that the homelessness experience is as brief as possible, prevent unsheltered homelessness, and avoid staying in shelters.</p> <ul style="list-style-type: none"> ▪ As this solution requires a stable funding source, the City will need to identify the extent to which this is a priority for local investment (HAIP Section 2.3 on page 38) and whether there are opportunities for non-traditional partner funding (such as philanthropy) or allocation of existing (but extremely limited) funding, e.g., Emergency Shelter Grant (ESG) dollars.
Expand rapid re-housing and FlexFund for 12-months assistance	<p>This solution involves leveraging vacant housing (either in the private or subsidized rental market). A landlord engagement team would find units for housing individuals. The engagement team works with a Flex Fund, covering deposits or fees, for example.</p> <ul style="list-style-type: none"> ▪ As with the diversion program above, ensuring a stable source of funds for the Flex Fund will be important to ensure that the program is effective. ▪ The City should also include this in the identification of local investment priorities in HAIP Section 2.3 on page 38.
Develop pathways to higher levels of care	<p>This is intended to ensure that individuals exiting from hospitals, for example, receive the continued in-home or site-based care they need to prevent them from being readmitted to the hospital or incurring other public or private costs resulting from post-treatment health issues.</p> <ul style="list-style-type: none"> ▪ During the HAS focus groups, leaders from hospitals spoke about this issue. As this issue touches on non-traditional partnership potentials (HAIP Section 2.4 on page 46), the City might re-engage or continue conversations with this group of stakeholders to explore alignments and resource potentials.

Key to Home Priorities (2024-26)	Opportunity for Alignment
	<ul style="list-style-type: none"> ▪ Demonstrating the cost-benefit of such solutions might be key to the private sector (hospitals) being a partner in this.
Pair permanent supportive housing with behavioral healthcare	<p>This is an ambitious but achievable initiative (which also aligns with one of the main goals identified by the DREAMS Committee⁶²) to better leverage resources (including potentially state Medicaid dollars) to provide integrated PSF with behavioral healthcare services.</p> <p>This also represents an opportunity for cross-agency coordination, informing delivery models (see discussions in following sections), as well as discussions around priorities for uses of local investment (HAIP Section 2.3 on page 38).</p> <p>This effort, as also identified by the DREAMS Committee, could include some possible implementation steps:</p> <ul style="list-style-type: none"> ▪ Examine other Medicaid options, such as state plan amendments and CHIP health services initiatives. ▪ Model other successful state efforts to get 1115 Medicaid waivers (e.g., Arizona, California, Indiana, Massachusetts, Montana, New York, North Carolina, and Oregon). ▪ Collaborate with community partners, such as Certified Community Behavioral Health Clinics and local housing agencies. <p>The intended outcome is to navigate through challenges arising from the increased administrative burden associated with Medicaid licensing, the intersection of roles that local, state and federal government play, as well as the challenges in succeeding at securing funding and financing for construction and operations of PSH projects.</p>
Rapid delivery of PSH	<p>This objective aligns with OCHA’s proposed delivery of PSH units over the next 10 years with MAPS4 allocations. This is, however, the least defined of the Key to Home initiatives but one with a clear need for priority-setting and resource allocation.</p> <ul style="list-style-type: none"> ▪ The City should also include this in the identification of local investment priorities in HAIP Section 2.3 on page 38. ▪ There is also an opportunity to document the cost-benefit of delivering these units sooner than later.

Source: Key to Home (2024); SGS Economics & Planning, 2025

⁶² The DREAMS Committee was formed as a biproduct of the Sequential Intercept Model Mapping Workshop that took place in April 2024. The workshop was put together to map and develop a community-based response to the involvement of people with mental and substance use disorders in the criminal justice system. One of the key priorities that came from the workshop was access to affordable and accessible housing.

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4. Stage 3: Program Evolution

The final stage of the Implementation Plan follows progress made toward many of the milestones in previous stages, such as the priority-setting of the first stage and the expansion of existing programs and establishment of new programs in the second stage. This stage may alternatively follow milestones involving the commitment or availability of a new local financial investment. However, commencing any evolution or further adaptation of programs, policies and administrative structures established in the previous stages would be defined by the City. As such, this stage covers:

- Program or policy updates
- Further delineation of partner roles and responsibilities
- Administrative structure modifications

TABLE 19: THIRD STAGE OVERVIEW

Effort	Actions
4.1 Refinement of Policies and Programs	
Goal 4.1.1: Update Programs and Polic	<ul style="list-style-type: none">▪ Conduct a Program Evaluation▪ Refine Programs
Goal 4.1.2: Refine Partner Roles and Responsibilities	<ul style="list-style-type: none">▪ Refine Roles and Responsibilities
Goal 4.1.3: Revisit Organizational Structure	<ul style="list-style-type: none">▪ Revisit Administrative Priorities and Objectives for Program Delivery▪ Revisit Housing Office Organizational Structure

Source: SGS Economics & Planning, 2025

4.1 Refinement of Policies and Programs

Goal 4.1.1: Update Programs and Policies

Conduct a Program Evaluation

To the extent necessary, and with an understanding of the limitations of financial resources, the City would complete targeted program evaluations. Broadly, this may include examining outcomes and effectiveness through evaluation and feedback gathered from stakeholders, users, administrators, and beneficiaries, including:

- **Effectiveness and uptake:** How well was the program utilized, by whom, to what extent, and did it measurably achieve its goals?
- **Administration:** For the City or any of its partners involved in administering a program, what did it cost, was it time-consuming or simple to administer, and what could have been done differently?
- **Value-for-money determinations:** When considering the evaluation points above (and any others), what was its cost-benefit ratio, were its benefits greater than its costs?

Program evaluations conducted periodically will ensure that the system is functioning as effectively as possible.

Refine Programs

Following program evaluations, some restructuring may be necessary. Based on experience and perspectives from peer cities, such reconsiderations could include:

- **Delivery models:** Broadly, the categories of delivery model include ownership and rental production, preservation and rehabilitation, as well as transitional housing (with supportive services) and DPA. Community, leadership or stakeholder feedback could lead to revised thinking around the appropriateness or importance of some of the underlying delivery models. This could include a more nuanced understanding of the community's interest in City-led or funded efforts targeted at models like owner-occupied rehab, the acquisition production, land acquisition, CLT, etc.
- **Beneficiaries:** Broadly, the categories of beneficiaries are households by AMI levels for which the market is not providing solutions, by tenure and by race/ethnicity or geography. Following on the GOLT vote outcome, more clarity may be apparent to guide the City's thinking around refinements that may be necessary to address what have emerged as priority issues.
- **Eligibility:** Some of the programs will have required the City to be specific about who (in terms of the applicant to programs and/or the individuals or households who are direct beneficiaries as well) should be eligible for which programs. The evaluation of eligibility might also include a reassessment of the procurement or RFP processes.
- **Geographic applicability:** As the City may have targeted certain areas of the City or neighborhoods for piloting some programs, this aspect of programs and policies could be revisited from time to time with updated analysis, as well as feedback from users, administrators and beneficiaries.
- **Compliance and reporting requirements:** Whenever specific criteria for affordable housing purposes are placed on new or expanded affordable housing programs, compliance and reporting are needed to avoid fraud or program abuse. Relevant to this point, one of the motivating factors for cities to make local investments or design local programs is to avoid the restrictive terms and conditions associated with federally funded programming.
- **Monitoring and enforcement:** In a similar vein, the City should revisit the terms and conditions of contracts put in place, compliance and monitoring processes, as well as enforcement provisions.

Goal 4.1.2: Refine Partner Roles and Responsibilities

Refine Roles and Responsibilities

As the City moves through various actions and stages of this Implementation, there will be opportunities for ongoing recalibration and realignment of roles and responsibilities. Some of the likeliest junctures could include the availability of a new or local funding source, the establishment and stabilization of a new program, or the emergence of a new non-traditional partner. Following these or any other significant milestone, it will be important for the City to monitor and assess the extent that programs and policies are being implemented with all the necessary resources (staff and skillsets) and partnerships as efficiently as possible. This review might consider:

- **Program needs:** This may involve reassessing individual program needs from a staffing and resourcing standpoint. Like the initial review of priorities for staffing (**HAIP Section 2.2** on page 36) in which the current Planning Department structure and functions were reviewed with an eye toward understanding where gaps might exist that could be filled by partner resources, this action would be similarly geared toward reassessing program needs at this point in time.
- **Partner coordination:** Following on the reassessment of program needs, a clearer understanding will emerge of the need to coordinate with partners, particularly if the City envisions evolving the structure of its own staff resources (as discussed next).
- **Community and stakeholder education:** As discussed in **HAIP Section 2.4** on page 48 regarding one of the many roles that a national partner could play, it will be important to reassess how community and stakeholder educational or certification needs may have evolved over time. This action would focus on identifying whether local partners are suited to maintaining these needs, what roles other partners can play, and how the City's internal staffing resources are playing a part.

Goal 4.1.3: Revisit Organizational Structure

Revisit Administrative Priorities and Objectives for Program Delivery

As noted above, **HAIP Section 2.2** identified a process for reviewing staffing capacity and developing a working version of a possible future organizational structure (page 37). In this evolving action, the City might draw clearer distinctions between traditional and newer functions, including:

- **Community development (i.e., federally-funded programming and administration):** This includes grants management, accounting, CAPER preparation and reporting, 5-Year Consolidated Plan preparation and reporting, CDBG contractor management, brownfields, CoC, HOPWA, and homelessness services.
- **Broader housing:** This includes some of the current HCD functions as well as expanded and new programs such as DPA, major/minor rehabilitation grants or loans, transitional housing construction or rehabilitation, LIHTC-funded projects.
- **New or cross-department or cross-partner:** This includes the roles that can be shared across existing partners (e.g., Alliance, OCHA, EDT, etc.), such as planning, construction, project management, property management, and development finance.

Revisit Housing Office Organizational Structure

Organization charts in cities with more established housing departments reflect a city's unique affordable housing and service priorities. They also often reflect a common set of administrative functions – e.g., program management, business development, grants management and development finance. As noted previously, examples of organization charts from other cities are provided in **HAIP Appendix F**.

As the implementation actions get underway, the need for new or revised roles and resources will emerge. The City and its partners may want to consider how (single or multiple sources) funds are allocated to staffing and how staffing can be assigned to cross-agency roles. Options for organizational resources as the Housing Office grows include the following:

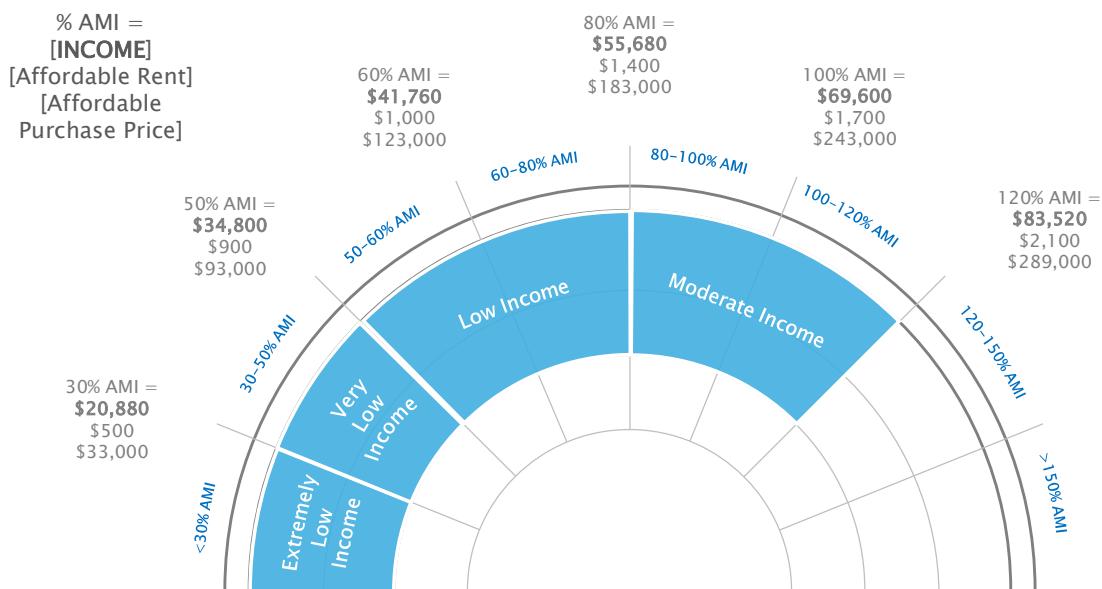
- **Stage 1:** The new PHP initiates the major functions of the Housing Office, bringing expertise and experience across the breadth of responsibilities to be taken during the initial years of policy and program implementation
- **Stage 2:** Following the establishment of more momentum (and continuity of financial resources), the Housing Office could expand with four key roles, each representative of individual function areas previously overseen by the Principal Housing Position alone:
 - Program manager: This role would be responsible for further design and expansion of major programs, such as the major/minor rehab program, DPA, rental rehab, etc., as well as administration.
 - Business development manager: The role would be responsible for furthering relations with housing development entities throughout the city and region, coordinating public relations, liaising across local regional and national partners, etc.
 - Grants manager: This would be an administrative and accounting role overseeing grants issued through HOME, CDBG as well as local resources. Such a position is a candidate for cross funding between local and federal dollars to the extent that such allocations of time can be accounted for.
 - Development finance manager: This would be a role responsible for coordinating across housing funding and financing entities, including liaising with the lending industry, OHFA, developers, the investment community, as well as development services and planning. This position is a candidate for cross-sharing and/or cross-funding across, for example, OCHA and the City.
- **Stage 3:** Once an established momentum can be achieved in Stage 2, exploration of further expansion of the Housing Office could include consideration for adding resources to the mid-level managers (Stage 2), such as: special projects managers, engagement specialists, fundraising specialists, contracts and procurement managers/specialists, compliance managers, fiscal and account managers and loan coordinators. At this stage in the evolution of the Housing Office, consideration should be given to cross-sharing and cross-funding of staffing resources between the City and its existing partners (local, regional, and/or national).

Appendix A: Terminology and Concepts

To assist in the implementation process, the following are concepts and terms commonly used in housing market and affordability analyses, such as were used for analysis in **HAS Section 4.2**. The terms help to clarify and interpret data sources used for analysis of supply and demand conditions. They are used in support of policy and programs to ensure that interventions align with need, creating a clear line of sight from analysis to policymaking, delivery, and tracking. and illustrate a few important demand and supply-side housing affordability definitions and terms for this framework.

- **Area Median Income (AMI):** “AMI” is shorthand for an area’s household median income. Unlike an “average”, which can be skewed by extreme highs or extreme lows, the median is a statistic representative of the point at which 50% of households fall above and 50% of households fall below. In both analysis and policy making, orientation around this metric creates a baseline from which the rest of the population can be understood. At the federal level, HUD programming and resources are calibrated to AMIs, as are the allocation of LIHTC equity at the state and local levels.
- **Household Income Levels:** over time, income ranges relative to the AMI have been adopted by the industry for programmatic purposes. As shown below, the categories represent common definitions used at the federal and state levels: Extremely Low Income = less than 30% AMI; Very Low Income = 30 to 50% AMI; Low Income = 50 to 80% AMI, and Moderate Income = 80 to 120% AMI.

FIGURE 2: AFFORDABILITY SPECTRUM



Income Terminology with Household AMI Categories, Supportable Rents and Purchase Prices (2022)

Source: HUD; SGS Economics & Planning, 2025

In the process of designing new or expanded policies and programs, it will be important for the City to understand and communicate how the metrics above relate to estimates of need vs. program design.

- Estimates of Need (U.S. Census or ACS data):** The columns in the graphic display the 2022 (ACS 1-year estimates) median household incomes at different household sizes for the Oklahoma City MSA. These are actual representations of the households in the area. More broadly, any statistics (housing supply, households, cost-burdened households, etc.) sourced from the U.S. Census, ACS or similar organization will be representations of actual conditions.
- Programmatic Qualifying Limits (HUD Section 8 Income Limits):** The grey-shaded area represents the upper limit of the qualifying income limits by household size (for the Oklahoma City MSA in 2022) that HUD applies to its programs, and which are used in identifying qualifying limits for LIHTC-funded projects. While there is a robust methodology HUD applies in developing their current year estimates of income limits, these are not actual representations of conditions. Rather, they are intended to be used in

TABLE 20: KEY DATASETS FOR AFFORDABLE HOUSING NEEDS ANALYSIS

Key Datasets	Descriptions
U.S. Census American Community Survey (ACS)	releases new data every year in the form of a wide variety of detailed estimates of demographic, socioeconomic and housing change within communities. The data are released in 1-year estimates for communities with a population of at least 65,000, and in 5-year estimates for communities of any size. When reporting a most current statistic and/or when comparing communities of similar size, the 1-year estimate is preferred. But when reporting on geospatial analysis or when it is most important to understand distributions, such as distributions of households by income by tenure (or by race) like all the datasets reported in the HAS Chapters 3 and 4, the 5-year estimates are preferred. Specifically, the analysis of housing gaps reported in Section 4.2 of the HAS utilized the following datasets from the ACS: Owner housing units by value (B25075); Owner households by income (B25118); Owner cost-burdened households by income (B25106); Renter housing units by gross rent (B25063); Renter households by income (B25118); Renter cost-burdened households by income (B25106).
HUD Income “Limits”	The Department of Housing and Urban Development (HUD) sets income limits that determine eligibility for assisted housing programs including the Public Housing, Section 8 project-based, Section 8 Housing Choice Voucher, Section 202 housing for the elderly, and Section 811 housing for persons with disabilities programs. The data are published every year and contain specific income thresholds (from a qualification perspective) for households of different size and by different income categories. Specifically, an analysis like the one completed for the HAS, Section 4.2, utilized data from https://www.huduser.gov/portal/datasets/il.html .

Source: SGS Economics & Planning, 2025

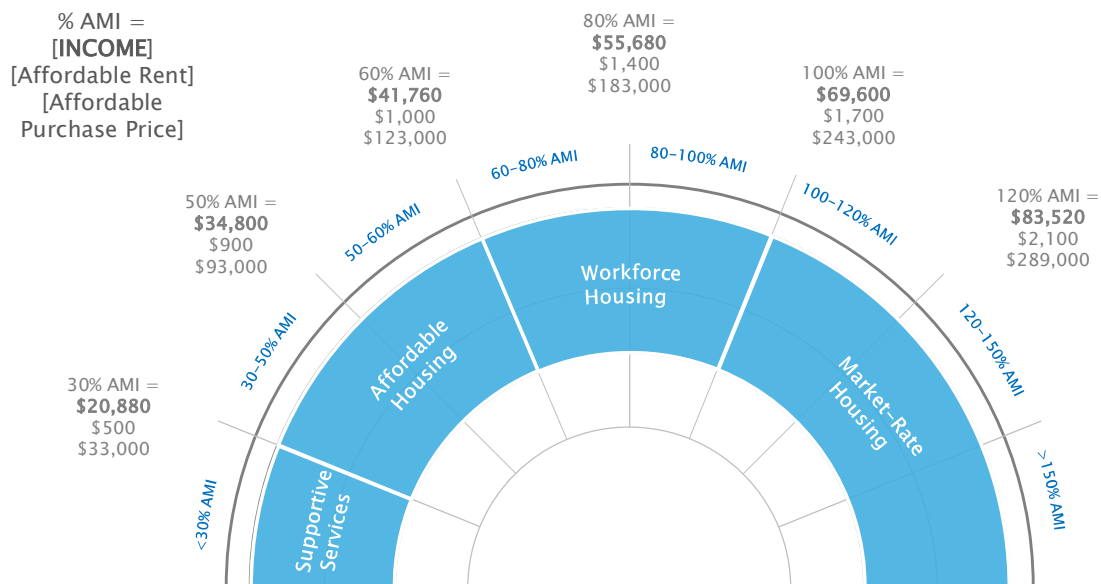
The second set of terms in the framework of housing affordability analysis reflects the need for policymakers to understand the alignments or linkages between income levels and broad categories of intervention or response types.

- **Supportive Services (under 30 percent AMI):** At the lowest end and below the 30 percent AMI mark is where interventions and policy responses commonly result in investment around crisis accommodation, transitional housing or permanent-supportive or service-enriched housing (terminology can vary by organization or practitioner). This end of the population is characterized by the presence of a variety of different populations, including: the working poor, retired and/or households on fixed incomes, and those at risk of homelessness. This end of the spectrum is typically the focus of homelessness and social services efforts, such as Key to Home.
- **Affordable Rental Housing (30 to 60 percent AMI):** the second category is associated with different variants on affordable rental housing (subsidized rentals). This part of the spectrum encapsulates two to three sub-categories: 30% to 50%, 50% to 60%, and 60% to 80%. The category between 30% and 50% represents households in great of affordable housing. Some households or individuals at this level

will require supportive services, others will not. Between 50% and 60% AMI, households are a part of the service-sector economy and do not usually require supportive services.

- Workforce Housing (60 to 100% AMI):** The category between 60% and 100% AMI represents realistically two distinct groups: those above and below 80% AMI. Households below 80% AMI can neither afford a home nor often qualify for a mortgage, but also struggle with moderate and severe housing stress when left to the open housing market. For them, policymakers are often challenged in providing proper interventions or delivery formats because of local housing market dynamics (i.e., the distribution of rents in the private rental housing market often overlaps at this 60 to 80% AMI range). For households above 80%, qualifying for a mortgage is easier, but in many markets, the home resale market provides little of this product in good condition. This is the category where attention is often given to solutions such as shared equity or share ownership models or the community land trust (CLT) model in which land is held in common ownership and the homes are made available for purchase as deed-restricted below-market prices.

FIGURE 3: AFFORDABILITY SPECTRUM WITH BROAD CATEGORIES



Possible Affordable Housing Delivery Model
Terminology with Household AMI Categories,
Supportable Rents and Purchase Prices (2022)

Source: HUD; SGS Economics & Planning, 2025

The final set of definitions relevant to housing affordability analysis relate to identifying the acceptable level of housing spending.

- **Cost-burden:** the common theme shared policies and programs across the country is the definition of cost-burden, meaning a threshold of household income spent on housing beyond which housing is considered unaffordable. Linking back to ranges and categories of AMI, housing is considered affordable when a household spends no more than 30 percent (but less than 50 percent) of their gross income on housing. A household spending more than 50 percent or more of its income on housing is referred to as experiencing severe cost-burden.⁶³
- **Affordable rent:** a subset of housing affordability, affordable rents are defined by the AMI of the year data are being analyzed and estimated as a renter household spending no more than 30 percent of its gross income on housing. The definitions above apply to renter in moderate and severe housing stress. In some international contexts, it is common for policymakers to consider utility costs in affordable rent analysis, where this issue has become particularly relevant.
- **Affordable purchase price:** a subset of housing affordability, affordable purchase prices are defined by the AMI of the year data are being analyzed, as well as other relevant assumptions for that year. For example, industry best practice for identifying affordable purchase prices include collecting average home loan borrowing rates for each year of analysis from the relevant source (Federal Reserve Bank branches, e.g., Federal Reserve Bank of St. Louis), as well as making assumption on a down payment (10 to 20 percent) and that a household spends 30 percent of its income on debt service. In some policy contexts, it is common for policymakers to consider property taxes, utility costs, as well as even homeowners association fees in an affordable purchase price analysis. These practices are often reflective of the growing concern among governments and advocates of housing affordability issues of the structural challenges facing households around purchasing and maintaining housing situations.

⁶³ According an article published by HUD in 2017, housing programs in the US have measured housing affordability in terms of percentage of income for decades. In the 1940s, the maximum affordable rent for federally subsidized housing was 20 percent, which rose to 25 percent of income in 1969 and 30 percent of income in 1981. Over time, the 30 percent threshold has become the standard for owner-occupied housing, and it remains the indicator of affordability. “Keeping housing costs below 30 percent of income is intended to ensure that households have enough money to pay for other nondiscretionary costs...” (Source: <https://www.huduser.gov/portal/pdredge/pdr-edge-featd-article-081417.html#:~:text=Keeping%20housing%20costs%20below%2030%20percent%20of%20income,on%20housing%20costs%20to%20be%20housing%20cost%20burdened.>)

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Appendix B: Housing Data

The following series of data tables are updates to a few of the more critical pieces of information used in support of major findings and recommendations of the HAS. Most up-to-date data releases have been used, including the following sources: the U.S. Census American Community Survey (5-Year estimates), the Oklahoma City Metro Association of Realtors (OKCMAR), CoStar Group, and HUD.

Households

Between 2010 and 2019, Oklahoma City grew by approximately 20,000 households. Owners accounted for about one-third of this growth while renters accounted for two-thirds. The predominance of renter household growth was common across the country following the Great Recession. It ushered in a strong uptick in the construction of apartment stock, but also significantly increased the scale of renter problems.

In the few years since the completion of the HAS (2019 to 2022), the city grew by more than 27,000 households – 4 times the prior decade’s annual growth rate. Although the split of household growth flipped (with owners and renters accounting for 65% and 35% of growth, respectively), the scale of growth has translated to continued pressure on the housing market.

TABLE 21: TOTAL HOUSEHOLDS BY AMI, 2010-2022

	2010	2019	2022	2010-19			2019-2022		
				Total Δ	Ann. #	Ann. %	Total Δ	Ann. #	Ann. %
Less than 30% AMI	40,306	43,445	48,740	3,139	349	0.8%	5,296	1,765	3.9%
31% to 50% AMI	34,040	35,606	39,018	1,566	174	0.5%	3,412	1,137	3.1%
51% to 60% AMI	16,512	16,751	19,462	239	27	0.2%	2,711	904	5.1%
61% to 80% AMI	27,471	29,266	33,432	1,795	199	0.7%	4,166	1,389	4.5%
81% to 100% AMI	21,134	26,589	27,887	5,454	606	2.6%	1,298	433	1.6%
101% to 120% AMI	19,465	18,783	22,866	-682	-76	-0.4%	4,082	1,361	6.8%
<u>Greater than 120% AMI</u>	<u>63,874</u>	<u>72,308</u>	<u>78,665</u>	<u>8,435</u>	<u>937</u>	<u>1.4%</u>	<u>6,356</u>	<u>2,119</u>	<u>2.8%</u>
Total Households	222,802	242,748	270,070	19,946	2,216	1.0%	27,322	9,107	3.6%

Source: U.S. Census ACS 5-Year Estimates, B25118; SGS Economics & Planning, 2025

TABLE 22: OWNER HOUSEHOLDS BY AMI, 2010-2022

	2010	2019	2022	2010-19			2019-2022		
				Total Δ	Ann. #	Ann. %	Total Δ	Ann. #	Ann. %
Less than 30% AMI	12,299	14,056	15,325	1,757	195	1.5%	1,269	423	2.9%
31% to 50% AMI	15,008	15,338	17,753	330	37	0.2%	2,415	805	5.0%
51% to 60% AMI	8,121	8,603	9,458	482	54	0.6%	855	285	3.2%
61% to 80% AMI	16,822	16,449	19,096	-373	-41	-0.2%	2,647	882	5.1%
81% to 100% AMI	14,581	15,973	17,575	1,391	155	1.0%	1,602	534	3.2%
101% to 120% AMI	13,992	12,961	15,840	-1,031	-115	-0.8%	2,879	960	6.9%
Greater than 120% AMI	55,936	59,613	65,708	3,677	409	0.7%	6,094	2,031	3.3%
Owner Households	136,759	142,993	160,755	6,234	693	0.5%	17,762	5,921	4.0%
as % of Total	61%	59%	60%	31%			65%		
Total Households	222,802	242,748	270,070	19,946	2,216	1.0%	27,322		3.6%

Source: U.S. Census ACS 5-Year Estimates, B25118; SGS Economics & Planning, 2025

TABLE 23: RENTER HOUSEHOLDS BY AMI, 2010-2022

	2010	2019	2022	2010-19			2019-2022		
				Total Δ	Ann. #	Ann. %	Total Δ	Ann. #	Ann. %
Less than 30% AMI	28,007	29,389	33,415	1,382	154	0.5%	4,026	1,342	4.4%
31% to 50% AMI	19,032	20,268	21,265	1,236	137	0.7%	997	332	1.6%
51% to 60% AMI	8,392	8,149	10,004	-243	-27	-0.3%	1,856	619	7.1%
61% to 80% AMI	10,648	12,816	14,336	2,168	241	2.1%	1,519	506	3.8%
81% to 100% AMI	6,553	10,616	10,312	4,063	451	5.5%	-304	-101	-1.0%
101% to 120% AMI	5,474	5,822	7,026	349	39	0.7%	1,203	401	6.5%
Greater than 120% AMI	7,937	12,695	12,957	4,758	529	5.4%	262	87	0.7%
Renter Households	86,043	99,755	109,315	13,712	1,524	1.7%	9,560	3,187	3.1%
as % of Total	39%	41%	40%	69%			35%		
Total Households	222,802	242,748	270,070	19,946	2,216	1.0%	27,322		3.6%

Source: U.S. Census ACS 5-Year Estimates, B25118; SGS Economics & Planning, 2025

Housing Inventory

Analysis of housing inventory data and households showed a mismatch between the diversity of new households (by size) to the city and a lack of similar diversity in the new inventory. The need for one- to two-bedroom inventory is not being met and the construction of larger homes continues to grow.

TABLE 24: CHANGE IN HOUSEHOLDS BY SIZE VS. UNITS BY BEDROOM COUNT, 2019-2022

Change in Households by Household Size (2019-22)			Change in Inventory by Bedroom Count (2019-22)		
	HHs	as %		Units	as %
1-Person	9,425	34%	Studios & 1-bdrm	3,257	13%
2-Person	7,431	27%	2-bdrm	2,076	8%
3-Person	5,438	20%	3-bdrm	12,656	49%
4-Person	2,358	9%	4-bdrm	6,490	25%
5+ Person	2,670	10%	5+ bdrm	1,221	5%
Total	27,322	100%	Total	25,700	100%

Source: U.S. Census, ACS 5-Year Estimates, B11016; SGS Economics & Planning, 2025

TABLE 25: TOTAL HOUSING INVENTORY BY AMI, 2010-2022

	2010	2019	2022	2010-19			2019-2022		
				Total Δ	Ann. #	Ann. %	Total Δ	Ann. #	Ann. %
Less than 30% AMI	21,917	28,791	27,964	6,875	764	3.1%	-827	-276	-1.0%
31% to 50% AMI	76,740	88,683	89,409	11,942	1,327	1.6%	726	242	0.3%
51% to 60% AMI	34,451	44,447	38,967	9,996	1,111	2.9%	-5,480	-1,827	-4.3%
61% to 80% AMI	46,596	39,162	51,892	-7,433	-826	-1.9%	12,730	4,243	9.8%
81% to 100% AMI	17,203	17,468	24,208	265	29	0.2%	6,739	2,246	11.5%
101% to 120% AMI	8,979	8,376	14,044	-603	-67	-0.8%	5,668	1,889	18.8%
Greater than 120% AMI	<u>12,362</u>	<u>11,451</u>	<u>18,959</u>	<u>-912</u>	<u>-101</u>	<u>-0.8%</u>	<u>7,508</u>	<u>2,503</u>	<u>18.3%</u>
Total Housing Units [1]	218,248	238,378	265,442	20,130	2,237	1.0%	27,064	9,021	3.6%

Source: U.S. Census ACS 5-Year Estimates, B25063 and B25075; SGS Economics & Planning, 2025

TABLE 26: OWNER HOUSING INVENTORY BY AMI, 2010-2022

	2010	2019	2022	2010-19			2019-2022		
				Total Δ	Ann. #	Ann. %	Total Δ	Ann. #	Ann. %
Less than 30% AMI	8,289	16,514	15,215	8,224	914	8.0%	-1,299	-433	-2.7%
31% to 50% AMI	37,179	41,718	34,257	4,540	504	1.3%	-7,461	-2,487	-6.4%
51% to 60% AMI	20,927	24,684	22,155	3,757	417	1.9%	-2,529	-843	-3.5%
61% to 80% AMI	35,888	28,746	36,857	-7,141	-793	-2.4%	8,110	2,703	8.6%
81% to 100% AMI	15,008	13,116	21,307	-1,892	-210	-1.5%	8,191	2,730	17.6%
101% to 120% AMI	7,921	7,564	13,002	-357	-40	-0.5%	5,439	1,813	19.8%
Greater than 120% AMI	<u>11,548</u>	<u>10,651</u>	<u>17,961</u>	<u>-896</u>	<u>-100</u>	<u>-0.9%</u>	<u>7,310</u>	<u>2,437</u>	<u>19.0%</u>
Subtotal Owner Units	136,759	142,993	160,755	6,234	693	0.5%	17,762	5,921	4.0%
as % of Total	63%	60%	61%	31%			66%		
Total Housing Units	218,248	238,378	265,442	20,130	2,237	1.0%	27,064	9,021	3.6%

Source: U.S. Census ACS 5-Year Estimates, B25075; SGS Economics & Planning, 2025

TABLE 27: RENTER HOUSING INVENTORY BY AMI, 2010-2022

	2010	2019	2022	2010-19			2019-2022		
				Total Δ	Ann. #	Ann. %	Total Δ	Ann. #	Ann. %
Less than 30% AMI	13,627	12,278	12,750	-1,349	-150	-1.2%	472	157	1.3%
31% to 50% AMI	39,561	46,964	55,151	7,403	823	1.9%	8,187	2,729	5.5%
51% to 60% AMI	13,524	19,763	16,812	6,239	693	4.3%	-2,952	-984	-5.2%
61% to 80% AMI	10,708	10,416	15,035	-292	-32	-0.3%	4,619	1,540	13.0%
81% to 100% AMI	2,196	4,352	2,900	2,157	240	7.9%	-1,452	-484	-12.7%
101% to 120% AMI	1,058	813	1,042	-246	-27	-2.9%	229	76	8.6%
Greater than 120% AMI	<u>814</u>	<u>799</u>	<u>998</u>	<u>-15</u>	<u>-2</u>	<u>-0.2%</u>	<u>199</u>	<u>66</u>	<u>7.7%</u>
Subtotal Renter Units [1]	81,489	95,385	104,687	13,896	1,544	1.8%	9,302	3,101	3.2%
as % of Total	37%	40%	39%	69%			34%		
Total Housing Units [1]	218,248	238,378	265,442	20,130	2,237	1.0%	27,064	9,021	3.6%

Source: U.S. Census ACS 5-Year Estimates, B25063; SGS Economics & Planning, 2025

Cost-Burden

In 2019, 68,000 (or 28%) of the city's households were spending more than 30% of their gross income on housing, with 42,000 of them (61%) being renters.⁶⁴ Also problematic was the fact that the number of cost-burdened households had been increasing at 370 per year between 2010 and 2019.

By 2022, the number of cost-burdened households had increased to 77,000 (29%), of which renters now accounted for 48,000 (an increase to 62%). Of concern is the fact that the scale of the problem had increased at a rate 6 times the prior decade (approximately 2,200 per year versus 370).

Among the cost-burdened renter households, approximately two-thirds (38,200) have incomes only at or below 60% AMI. This subset of cost-burdened renter households had been growing at 200 per year since 2010. By 2022, the portion of all cost-burdened renters with incomes at or below 60% AMI had increased to 69% (44,600). In context of the data presented in the box above, this subset was growing at 2,100 per year, meaning that 95% of all new cost-burdened renter households had incomes of 60% AMI or less.

TABLE 28: TOTAL COST-BURDENED HOUSEHOLDS BY AMI, 2010-2022

	2010	2019	2022	2010-19			2019-2022		
				Total Δ	Ann. #	Ann. %	Total Δ	Ann. #	Ann. %
Less than 30% AMI	31,450	31,927	36,200	477	53	0.2%	4,273	1,424	4.3%
31% to 50% AMI	16,675	20,206	21,745	3,531	392	2.2%	1,539	513	2.5%
51% to 60% AMI	7,364	4,921	7,299	-2,442	-271	-4.4%	2,377	792	14.0%
61% to 80% AMI	6,601	5,632	5,948	-970	-108	-1.7%	316	105	1.8%
81% to 100% AMI	3,204	2,968	2,573	-236	-26	-0.8%	-394	-131	-4.6%
101% to 120% AMI	2,308	479	359	-1,829	-203	-16.0%	-119	-40	-9.1%
<u>Greater than 120% AMI</u>	<u>2,765</u>	<u>2,326</u>	<u>3,235</u>	<u>-438</u>	<u>-49</u>	<u>-1.9%</u>	<u>908</u>	<u>303</u>	<u>11.6%</u>
Renter Households	70,366	68,459	77,359	-671	-75	-0.3%	8,900	2,967	4.2%
As % of Renter HHs									
Less than 30% AMI	78%	73%	74%	-5%	---	---	1%	---	---
31% to 50% AMI	49%	57%	56%	8%	---	---	-1%	---	---
51% to 60% AMI	45%	29%	38%	-15%	---	---	8%	---	---
61% to 80% AMI	24%	19%	18%	-5%	---	---	-1%	---	---
81% to 100% AMI	15%	11%	9%	-4%	---	---	-2%	---	---
101% to 120% AMI	12%	3%	2%	-9%	---	---	-1%	---	---
<u>Greater than 120% AMI</u>	<u>4%</u>	<u>3%</u>	<u>4%</u>	<u>-1%</u>	---	---	<u>1%</u>	---	---
Renter Households	32%	28%	29%	-3%	---	---	0%	---	---

Source: U.S. Census ACS 5-Year Estimates, B25106; SGS Economics & Planning, 2025

⁶⁴ Analysis of U.S. Census ACS 5-year estimates data.

TABLE 29: COST-BURDENED OWNER HOUSEHOLDS BY AMI, 2010-2022

	2010	2019	2022	2010-19			2019-2022		
				Total Δ	Ann. #	Ann. %	Total Δ	Ann. #	Ann. %
Less than 30% AMI	8,824	9,381	10,200	557	62	0.7%	819	273	2.8%
31% to 50% AMI	6,873	6,930	7,412	57	6	0.1%	482	161	2.3%
51% to 60% AMI	3,435	2,510	3,004	-925	-103	-3.4%	493	164	6.2%
61% to 80% AMI	5,001	3,321	3,805	-1,680	-187	-4.4%	485	162	4.6%
81% to 100% AMI	2,672	2,245	1,698	-427	-47	-1.9%	-548	-183	-8.9%
101% to 120% AMI	2,059	397	315	-1,661	-185	-16.7%	-82	-27	-7.5%
<u>Greater than 120% AMI</u>	<u>2,645</u>	<u>2,106</u>	<u>2,834</u>	<u>-539</u>	<u>-60</u>	<u>-2.5%</u>	<u>728</u>	<u>243</u>	<u>10.4%</u>
Owner Households	31,509	26,890	29,267	-4,619	-513	-1.7%	2,377	792	2.9%
As % of Owner HHs									
Less than 30% AMI	22%	22%	21%	0%	---	---	-1%	---	---
31% to 50% AMI	20%	19%	19%	-1%	---	---	0%	---	---
51% to 60% AMI	21%	15%	15%	-6%	---	---	0%	---	---
61% to 80% AMI	18%	11%	11%	-7%	---	---	0%	---	---
81% to 100% AMI	13%	8%	6%	-4%	---	---	-2%	---	---
101% to 120% AMI	11%	2%	1%	-8%	---	---	-1%	---	---
<u>Greater than 120% AMI</u>	<u>4%</u>	<u>3%</u>	<u>4%</u>	<u>-1%</u>	---	---	<u>1%</u>	---	---
Owner Households	14%	11%	11%	-3%	---	---	0%	---	---

Source: U.S. Census ACS 5-Year Estimates, B25106; SGS Economics & Planning, 2025

TABLE 30: COST-BURDENED RENTER HOUSEHOLDS BY AMI, 2010-2022

	2010	2019	2022	2010-19			2019-2022		
				Total Δ	Ann. #	Ann. %	Total Δ	Ann. #	Ann. %
Less than 30% AMI	22,626	22,546	26,000	-80	-9	0.0%	3,454	1,151	4.9%
31% to 50% AMI	9,802	13,276	14,333	3,475	386	3.4%	1,057	352	2.6%
51% to 60% AMI	3,929	2,411	4,295	-1,517	-169	-5.3%	1,884	628	21.2%
61% to 80% AMI	1,601	2,311	2,143	711	79	4.2%	-168	-56	-2.5%
81% to 100% AMI	531	723	876	191	21	3.5%	153	51	6.6%
101% to 120% AMI	249	81	45	-168	-19	-11.7%	-37	-12	-18.2%
<u>Greater than 120% AMI</u>	<u>119</u>	<u>220</u>	<u>401</u>	<u>101</u>	<u>11</u>	<u>7.1%</u>	<u>180</u>	<u>60</u>	<u>22.0%</u>
Renter Households	38,857	41,569	48,092	3,342	371	0.8%	6,523	2,174	5.0%
As % of Renter HHs									
Less than 30% AMI	56%	52%	53%	-4%	---	---	1%	---	---
31% to 50% AMI	29%	37%	37%	8%	---	---	-1%	---	---
51% to 60% AMI	24%	14%	22%	-9%	---	---	8%	---	---
61% to 80% AMI	6%	8%	6%	2%	---	---	-1%	---	---
81% to 100% AMI	3%	3%	3%	0%	---	---	0%	---	---
101% to 120% AMI	1%	0%	0%	-1%	---	---	0%	---	---
<u>Greater than 120% AMI</u>	<u>0%</u>	<u>0%</u>	<u>1%</u>	<u>0%</u>	---	---	<u>0%</u>	---	---
Renter Households	17%	17%	18%	0%	---	---	1%	---	---

Source: U.S. Census ACS 5-Year Estimates, B25106; SGS Economics & Planning, 2025

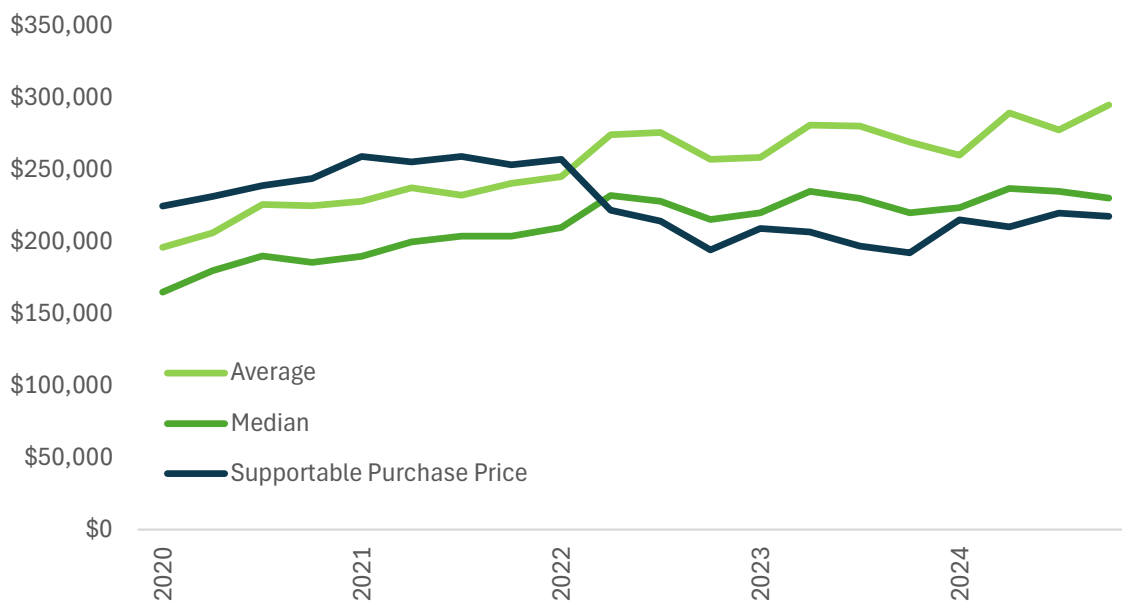
Housing Prices

Housing prices have shifted significantly since completion of the HAS. Although not shown, the HAS Section 3.3.1 documented that average housing prices had escalated by 4.7% per year between 2009 and 2020. By contrast, during the few years since then, average housing prices have escalated at 10.9% per year. Median prices, by contrast, have escalated at 8.7% per year.

The third trend line shown below illustrates the supportable purchase price for a household in Oklahoma City earning median income. This analysis found that a household's supportable purchase price had declined from approximately \$225,000 at the beginning of 2020 and fallen to less than \$218,000 by the end of 2024. While the result of interest rate increases affecting primarily the cost of borrowing, other factors would have played into this as well, such as high household growth as documented earlier.

Assumptions used in this analysis included the household median income from ACS 5-year estimates (for respective years – in 2024, for which data are not yet available, it was assumed that the average of previous years' income increases applied); other assumptions in this analysis included: 30-year fixed-rate mortgage product was used in the respective year and quarter; a household spent 30% of their gross income on housing; the homeowner insurance premium average was \$4,000 per year; property taxes were estimated at 0.85% of total value; and a down payment of 10% was made.

FIGURE 4: AVERAGE, MEDIAN AND AFFORDABLE PURCHASE PRICES, 2020-2024



Source: OKCMAR; SGS Economics & Planning, 2025

TABLE 31: DATA TABLE OF AVERAGE, MEDIAN AND AFFORDABLE PURCHASE PRICES, 2020-2024

Year	Quarter	Average	Median	Supportable [1]
2020	1	\$195,921	\$165,000	\$224,729
2020	2	\$206,167	\$179,900	\$231,641
2020	3	\$225,754	\$190,000	\$238,974
2020	4	\$225,053	\$185,500	\$244,051
2021	1	\$228,013	\$189,825	\$258,994
2021	2	\$237,528	\$200,000	\$255,394
2021	3	\$232,409	\$204,000	\$259,099
2021	4	\$240,562	\$204,000	\$253,306
2022	1	\$245,104	\$210,000	\$257,030
2022	2	\$274,294	\$232,000	\$221,914
2022	3	\$275,666	\$228,000	\$214,333
2022	4	\$257,124	\$215,500	\$194,343
2023	1	\$258,536	\$220,001	\$209,262
2023	2	\$281,045	\$234,995	\$206,597
2023	3	\$280,222	\$230,000	\$196,885
2023	4	\$269,415	\$220,000	\$192,310
2024	1	\$260,124	\$223,675	\$215,080
2024	2	\$289,530	\$237,000	\$210,326
2024	3	\$277,826	\$235,000	\$219,865
2024	4	\$294,967	\$230,250	\$217,738

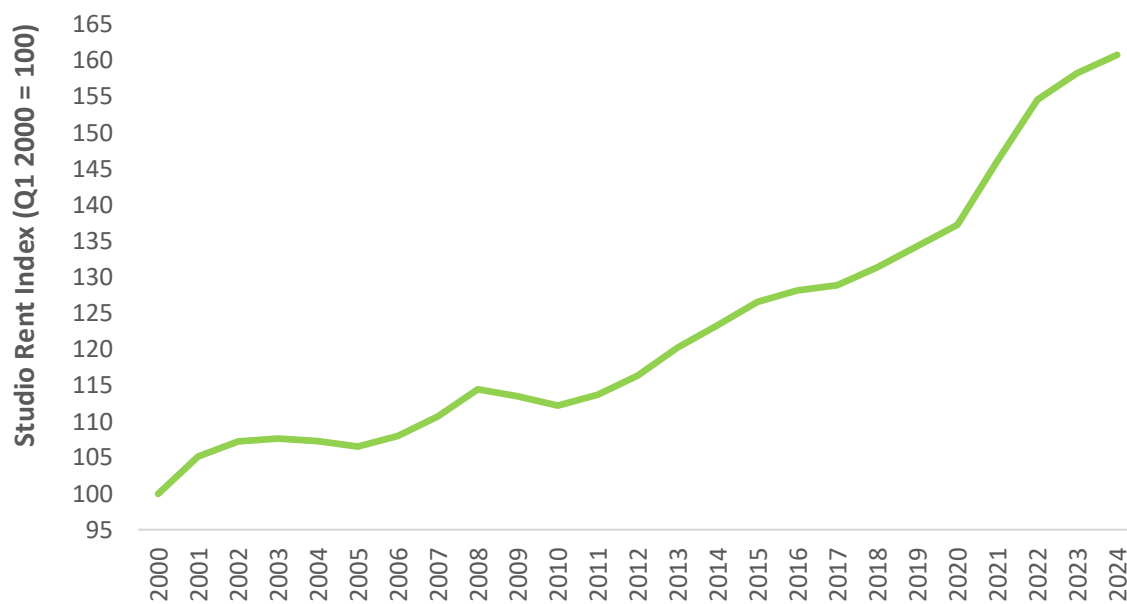
[Note 1: Based on ACS 5-year estimates of household median income for Oklahoma City (2024 median interpolated from average increase over past few years), assumes 30-year FRM to respective year and quarter, 30% of gross income spent on housing, homeowner insurance premium average of \$4,000 per year, property taxes at 0.85% of total purchase price, and down payment of 10%.

Source: OKCMAR; SGS Economics & Planning, 2025

Rental Rates

Rental rates have shifted significantly since completion of the HAS. As documented also in HAS Section 3.3.1, rental rates between approximately 2010 and 2020 had increased by approximately 2.0% per year. Since 2020, however, rental rates have escalated at an average of 4.0% per year.

FIGURE 5: RENTAL RATES, 2000-2024



Source: Economic & Planning Systems; SGS Economics & Planning, 2025

Appendix C: Development Incentives

Development incentives for affordable housing exist in three primary categories: 1) capital, 2) revenue, and 3) credit enhancement mechanisms.

TABLE 32: TARGETED HOMEBUYER ASSISTANCE PROGRAM DESIGN CONSIDERATIONS

Key Consideration	Description
Capital subsidies	<p>This is a direct infusion of cash or equity into a project's sources of funds. The LIHTC program (established in 1983) is the best example of a mechanism designed to: a) stimulate a significant scale of annual investment in affordable housing (130,000+ dwellings per year⁶⁵), b) incentivizing multi-sector (i.e., private capital) leveraging, and c) are effective at achieving relatively deep levels of affordability. The two forms of the LIHTC program's tax credits bring affordable housing developers approximately 30 percent equity for projects awarded 4 percent tax credits and bring between 60 and 70 percent equity for projects awarded competitive 9 percent tax credit equity.</p> <p>Capital subsidies can be made available in the form of debt or equity, making it a versatile and effective form of incentive. However, the commitment of funds can quickly consume large portions of available funds, leading to just a few projects being subsidized at any one time (as would be the case with use of low-interest loans).</p>
Revenue subsidies	<p>This is a form of incentive deployed to subsidize the operational costs of either maintaining or achieving housing available at below-market rents and/or subsidizing the provision of supportive services. Revenue mechanisms can be direct or indirect subsidies for buying down rents. The most common examples of a revenue subsidy include: 1) on the demand side, Housing Choice Vouchers, in which tenants or projects are the recipient of a voucher that covers the difference (for a landlord) between fair market rents (FMR) and 30% of their household income; and 2) property tax exemptions or reductions to the owner of affordable rental housing, whereby reducing operating costs (indirectly reducing rents).</p> <p>On one hand, revenue subsidies sourced from a bond issue would not be recommended. Revenue subsidies in the form of property tax incentives, however, could be an effective supplement to the commitment of local dollars</p>

⁶⁵ This figure represents both new construction and rehabilitation/preservation of expiring tax-credit projects.

Key Consideration	Description
	through a bond issue. As was suggested in the HAS Section 7.1.2 for rental a scaled preservation and rehabilitation program, this subsidy would mimic some of the structures of TIF.
Credit enhancement	<p>This type of subsidy is intended to mitigate and/or enhance borrower or producer credit and capacity, as well as reduce risk. Such mechanisms in practice have a more indirect relationship to the production or subsidy of social and affordable housing provision. Common efforts involve the provision of loan guarantees or loan loss reserve funds and the engagement of specialised financial intermediaries, such as syndicators whose role is to provide scaled access to investment. In practice, credit assistance mechanisms can be effective for removing less visible underwriting barriers for small- or mid-sized developers in markets with great need but underdeveloped production capacity. They can function by enhancing borrowing capacity to take on larger or overlapping projects.</p> <p>The focus groups conducted for the HAS (summarized in HAS Section 2.2) documented a series of issues faced by small-scale developers including financing and access to capital. Some of their issues could be resolved through, for example, bridge financing or take-out guarantees, which could be used in an RLF structure. This is also reflected in the recommendations HAS Section 7.2.3.</p>

Source: City of Dallas; SGS Economics & Planning, 2025

Appendix D: Local Housing Bond

As an example of a local investment contemplated in Section 7.4 of the HAS, **Table 33** summarizes a set of uses and limitations for the most common types of bond issues for Oklahoma City: GOLT and General Obligation bonds (under Article 10 §27). While the City has had extensive experience across each of these mechanisms, the following is provided as context and reference for the consideration of future bond issues sought for the purposes of local housing investment. Also, for consideration for a future bond issue would be a reflection on lessons learned from the 2017 GOLT bond, in which \$10 million was allocated to housing and helped subsidize 932 housing units (approximately 624 of which were affordable).

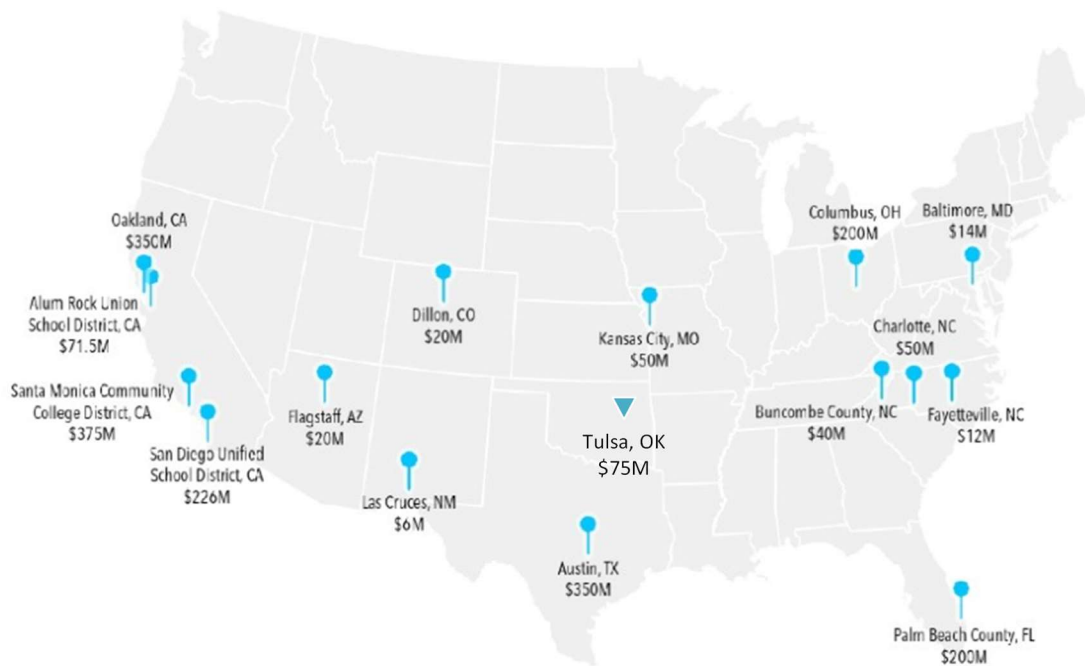
TABLE 33: USES AND LIMITATIONS OF GENERAL OBLIGATION VS. GOLT BONDS

City	GOLT	General Obligation
Permitted Uses	Economic development, redevelopment of blighted areas, homeless/youth/senior centers	More traditional hard infrastructure, including streets, bridges, public utilities, parks, police, fire, although statute could be interpreted more broadly to include housing
Defining the Uses in the Bond Package	Can be defined broadly	70% of bond proceeds must be specifically designated to projects; 30% can be broad or general
Possible Applications	New construction, rehabilitation or preservation of housing, infrastructure, land acquisition, administration	Potentially the same as for GOLT
Possible Mechanisms	Direct subsidy, funds for establishing a Revolving Loan Fund or a recapitalizing structure (e.g., making low- or no-interest loans available to beneficiaries)	Fund may not be available for a Revolving Loan Fund
Limitations	The program should be designed to demonstrate specifically how dollars will be spent in alignment with statute, including how and when. For example, local dollars cannot be used for credit cleaning or ownership.	Improvements must be exclusively owned (but not necessarily operated by) the City.

Source: SGS Economics & Planning, 2025

For further consideration, the following material presents a context to recent housing bond issues across the country (**Figure 6**), as well as consideration for the ballot language used by cities in presenting housing initiatives to voters (**Table 34**). Whereas some cities have funded housing investment indirectly through large GO bond packages to fund enabling infrastructure (specific utility upgrades, roads, public amenities, etc.), others have paired housing investment with economic or workforce development. As a further point of reference, high-level analysis completed in **HAS Section 7.4** assumed an illustrative GOLT bond for housing at \$60 million.

FIGURE 6: RECENT HOUSING BOND ISSUES ACROSS THE US (2022)



Source: National Low Income Housing Coalition (2022)⁶⁶; SGS Economics & Planning, 2025

⁶⁶ <https://nlihc.org/resource/affordable-housing-bond-measures-were-passed-nationwide-2022-elections>

Below is ballot language from a few cities' recent bond issues as it appeared to voters. The brevity of Charlotte and Seattle's ballot language reflects the fact that both cities have repeatedly issued housing bonds, and that community expectations and sentiment are well-established. Following on the prioritization process of **HAIP Section 2.3** on page 37, decisions around the types of uses, eligibility, beneficiaries, etc., the City would be able to incorporate such insights into ballot language appropriate to the context and reflective of the degree of importance for the issues.

TABLE 34: APPROVED HOUSING BOND PROPOSITION BALLOT LANGUAGE IN PEER CITIES

City	Housing Bond Proposition Ballot Language
Austin	Shall the City Council of the City of Austin, Texas be authorized to issue general obligation bonds and notes of the City for the public purposes of planning, designing, acquiring, constructing, renovating, improving, and equipping affordable housing facilities and related infrastructure for low and moderate income persons and families; acquiring land and interests in land and property necessary for such purposes; funding affordable housing and home repair programs as may be permitted by law; funding loans and grants for such purposes, pursuant to an economic development program now or hereafter approved; and all matters necessary or incidental thereto; with the bonds and notes to be issued in one or more series or issues, in the aggregate principal amount of \$350,000,000, to mature serially or otherwise and bear interest at a rate or rates not to exceed the respective limits prescribed by law at the time of issuance, and to be sold at the price or prices as the City Council determines and shall there be levied and pledged, assessed, and collected annually ad valorem taxes on all taxable property in the City in an amount sufficient, within the limits prescribed by law, to pay the annual interest on the bonds and notes and to provide a sinking fund to pay the bonds and notes at maturity?
Charlotte	Shall the order authorizing \$50,000,000 of bonds plus interest to pay the capital costs of housing projects for the benefit of persons of low income, or moderate income, or low and moderate income, including construction of infrastructure improvements related thereto and the acquisition of land and rights-of-way required therefor, and providing that additional taxes may be levied in an amount sufficient to pay the principal of and interest on the bonds be approved?
Columbus	Shall bonds be issued by the City of Columbus, Ohio for the purpose of promoting neighborhood and community development and affordable housing within the City of Columbus by purchasing, constructing, demolishing, renovating, improving, equipping and furnishing residential and commercial structures in the City, and acquiring, clearing, testing, remediating environmental issues, extending utilities, and otherwise improving residential and commercial sites in the City, and providing funds for grants in connection with the same in the principal amount of \$200,000,000 to be repaid annually over a maximum period of 20 years, and an annual levy of property taxes be made outside of the ten-mill limitation, estimated by the county auditor to average over the repayment period of the bond issue 0.78 mills for each one dollar of tax valuation, which amounts to \$0.078 for each one hundred dollars of tax valuation, commencing in 2022, first due in calendar year 2023, to pay

City	Housing Bond Proposition Ballot Language
	the annual debt charges on the bonds, and to pay debt charges on any notes issued in anticipation of those bonds?
San Antonio	Shall the City Council of the City of San Antonio, Texas, be authorized to issue bonds of the City in one or more series in the aggregate principal amount not to exceed \$150,000,000 for the public purposes of production and preservation of affordable and permanent supportive housing, acquisition, construction and rehabilitation of homes, providing loans and grants for affordable housing programs, the acquisition of necessary land and interest in land and property, as permitted by law, including the City's Home-Rule Charter, and consistent with program and policy directives adopted by City Council under authority granted by the Charter, and in implementing affordable housing programs and projects the City Council shall have the discretion to approve or deny any program or project and reallocate funding within the bond funds as the City Council finds to be in the best interest of the citizens of San Antonio to carry out affordable housing objectives; the bonds to mature serially or otherwise not more than 40 years from their date in accordance with law; and any issue or series of bonds to bear interest at a rate or rates (fixed, floating, variable, or otherwise) as may be determined within the discretion of the City Council; provided, however, that the rate of interest shall not exceed the maximum rate per annum authorized by law at the time of the issuance; and shall the City Council be authorized to levy and pledge, and cause to be assessed and collected, annual ad valorem taxes on all taxable property in the City sufficient to pay the annual interest and provide a sinking fund to pay the bonds at maturity and to pay the costs of any credit agreements executed in connection with the bonds?
Seattle	If approved, this proposition would replace the expiring Seattle Housing Levy and fund housing and housing services for low-income households, including seniors, working families, people with disabilities, and people experiencing homelessness. It authorizes a seven-year property tax increase for collection beginning in 2024 at approximately \$0.45/\$1,000 in assessed value, up to a maximum of \$3.60/\$1,000 in assessed value. The 2024 regular levy amount would be used to compute limitations for 2025-2030 levies. Seniors, veterans, and others qualified under RCW. 84.36.381 are exempt.
Tulsa	<p>[Ballot language is unclear with regard to specific housing initiatives] From the City's website (Improve Our Tulsa⁶⁸ or IOT), however, the IOT renewal is an \$814 million package to fund critical improvements to City facilities, equipment, and street infrastructure while making a substantial investment toward a \$104.2 million Tulsa Housing Initiative to help fill a critical housing need in Tulsa.</p> <p>Further, a summary on the City's website⁶⁹ summarizes Housing and Neighborhoods investment at \$75 million for housing (but without any details regarding projects) to be combined with \$5 million in ARPA funds, \$8.1 million in Downtown Development</p>

⁶⁸ <https://www.cityoftulsa.org/IOT2023>

⁶⁹ <https://www.cityoftulsa.org/media/21884/iot-overview-english-and-spanish.pdf>

City	Housing Bond Proposition Ballot Language
	Redevelopment Fund ⁷⁰ (DDRF) funds, \$5 million in HOME-ARP funds and \$2.7 million in opioid settlement funds to establish a \$104.2 million Tulsa Housing Initiative.

Source: Economic & Planning Systems; SGS Economics & Planning, 2025

A final consideration for the City in the process of identifying opportunities for local investment through a housing bond issue might be for the type of community and stakeholder engagement conducted in advance of taking a bond initiative to voters. While the City currently conducts extensive stakeholder engagement and seeks community input for local investment initiatives, the example below from the City of San Antonio offers a view into a different style of process tailored to meet the needs of a different community culture and context.

FIGURE 7: PRIORITY SETTING IN SAN ANTONIO

Community Education and Setting Bond Priorities

In San Antonio, prior to the first housing bond issue a few years ago, the mayor appointed a small committee to oversee education efforts. Co-chairs led subcommittee groups across the city with approximately 30 participants each, including residents, industry professionals and developers. The community education process leveraged the findings of the City's housing needs assessment and Strategic Housing Implementation Plan, but conversations within individual groups were not limited to those specific parameters.

These groups met 3-4 times between October and December to discuss and build consensus on priorities (prior to the May vote). Parents were offered child care vouchers as an incentive. Subcommittees vote and make recommendations, which are forwarded to the committee and City Council. Council then has 30 days to adjust before adopting the recommended priorities through resolution.

Source: SGS Economics & Planning, 2025

⁷⁰ <https://partnertulsa.org/downtown-development-redevelopment-fund/>

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Appendix E: CDFIs

CDFIs are local, mission-driven organizations that are the by-product of national legislation passed 1994 to promote economic development and provide financing in distressed communities.⁷¹ They are a form of public-private partnership that serve people and businesses underserved by traditional financial institutions. With this mission, CDFIs rely on public and private financing including grants, awards and donations. By some estimates, there are as many as 1,500 CDFIs across the country. The two below are those with a national footprint commonly operating in the space of affordable housing development and management.

TABLE 35: EXAMPLES OF NATIONAL SCALE CDFIS

Organization	Overview
Local Initiatives Support Corporation (LISC)	was established in 1979 by the Ford Foundation as an “intermediary” non-profit with strong community partnerships to connect difficult to access public and private resources with underinvested places and people. As such, LISC bridges the gap by offering relationships and expertise to assist community organizations in attracting additional resources. LISC receives its funding from banks, corporations, foundations and government agencies. It uses that funding to provide financing (loans, grants and equity) and technical and management assistance to local partners and developers. LISC currently has 38 local offices, a rural program that reaches more than 2,400 counties in 49 states, and LISC-founded affiliates and entities. In addition to its affordable housing initiatives, LISC also makes investments through community-based partners in businesses, jobs & financial health, education, safety and health
Enterprise	was established in 1982 with a mission to work toward making an impact on housing preservation and production, racial equity, resilience, upward mobility, partner sustainability and resident success. Enterprise is organized around three central goals: to increase housing supply, advance racial equity and build resilience and upward mobility. Enterprise is organized across three divisions – Solutions, Capital and Community Development. The Solutions division operates a 501(c)(3) nonprofit nationwide with programmatic, policy, advisory and capacity-building arms at the national, state and local level, working in more than 700 communities and in collaboration with thousands of partners in the nonprofit, public and for-profit sectors. The Capital division comprises several subsidiaries: a 501(c)(4) nonprofit that invests and asset manages a range of tax credits and equity; a 501(c)(3) nonprofit that is one of the country’s largest publicly-rated Community Development Financial Institutions (CDFI); and an equity interest in Bellwether Enterprise, through which

⁷¹ <https://crsreports.congress.gov/product/pdf/R/R47217>

we also provide access to conventional mortgage products. The Community Development division operates a 501(c)(3) nonprofit that is one of the largest nonprofit owners and developers of affordable homes in the Mid-Atlantic and is the sixth largest nonprofit affordable housing provider in the U.S. Across these functions, Enterprise provides: products for Investors; financing for developers; advisory services & technical assistance; program design & evaluation; as well as development, property management & resident services

Source: SGS Economics & Planning, 2025

TABLE 36: CITY OF SAN ANTONIO NATIONAL PARTNERS

Organization	Overview
Grow America (GA) , formerly NDC	works with the City’s grants team on administration and to complete the HUD 5-Year Consolidated Plan. It does not work with the City on the capital side but does provide finance classes and community education. While GA does not provide such technical assistance to San Antonio, their full-service TA contract typically cost approximately \$120k or more per year, including scholarships for economic development and housing certifications
LISC	initiated as a formal agreement in 2017 prior to the City’s Implementation Plan, LISC’s contract is funded through the City’s General Fund at \$250k per year to support 2 FTEs that function as: capacity-building, marketing and messaging in housing and homelessness services, community education, and convening of partners. The Executive Director was also an appointee to the Housing Bond Committee. LISC also brings a network benefit. They specifically helped secure a HUD Thriving Communities Grant. Through Section 4 loans, LISC also helped get numerous CHDOs certified. LISC has also introduced its Seed Academy, which builds affordable housing expertise in firms or entities that have not but wish to engage in such development efforts
Grounded Solutions Network	led the City’s 18-month process to complete an Anti-Displacement Strategy (funded by its own For Everyone Home initiative), which culminated in recommendations being incorporated into the Strategic Housing Implementation Plan

Source: SGS Economics & Planning, 2025

Appendix F: Examples of Other City Organizational Structures

Organization charts in cities with more established housing departments reflect a city's unique affordable housing and service priorities. They also often reflect a common set of administrative functions – e.g., program management, business development, grants management and development finance.

The following series of organizational structure charts is provided for future reference as the Implementation Plan proceeds and as needs and conditions evolve. They represent a cross-section of cities that have made investments in affordable housing production, preservation and rehabilitation as Oklahoma City is contemplating. But they reflect how differently not only different governance, reporting, and departmental structures, but also how prominently certain positions (like a PHP) feature as a reflection of how important such efforts were to respective communities. The following examples are provided:

- City of San Antonio
- City of Austin
- City of Denver
- City of Charlotte
- City of Dallas
- City of Colorado Springs

FIGURE 8: CITY OF SAN ANTONIO NHSD ORGANIZATIONAL STRUCTURE

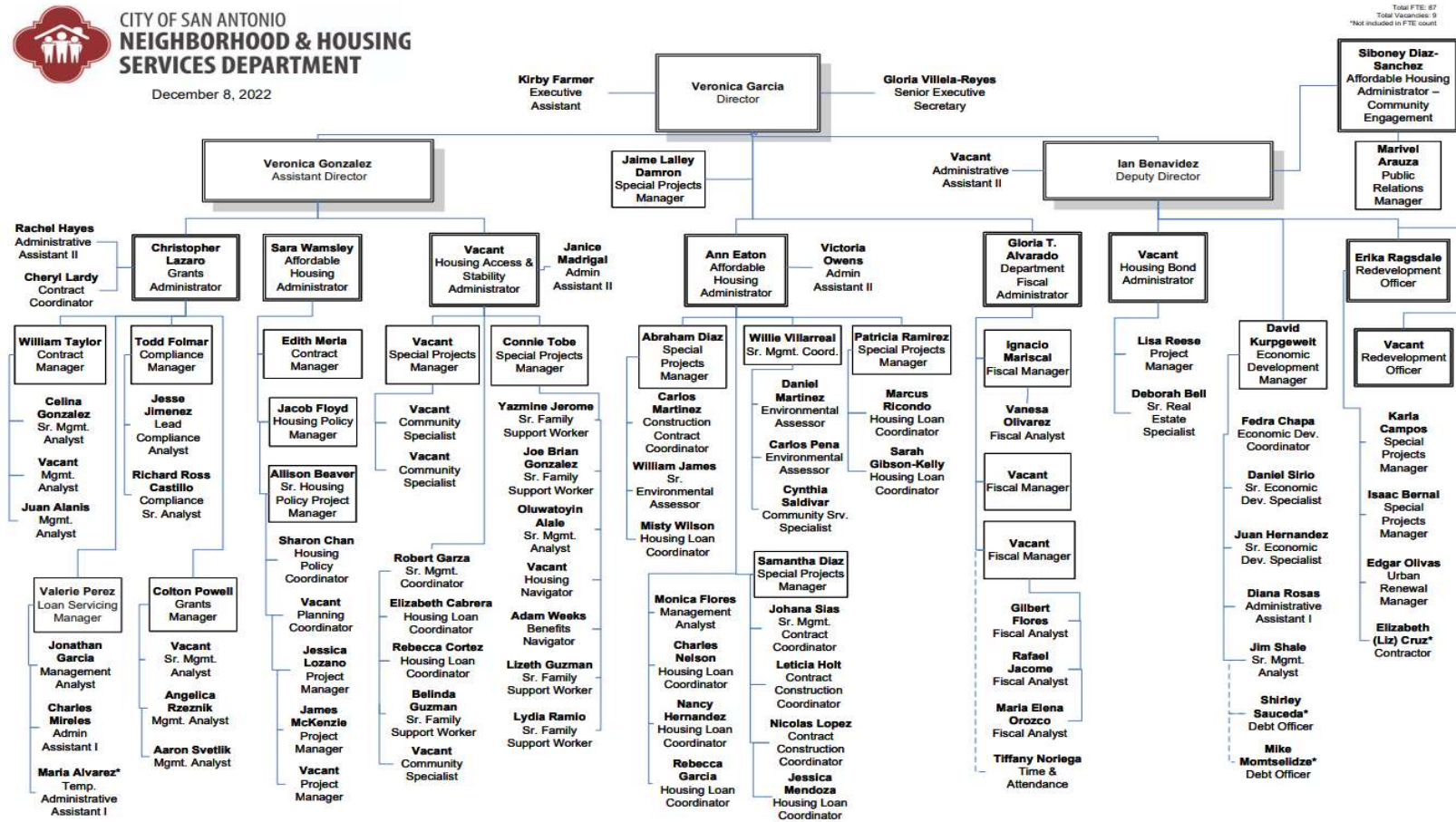


FIGURE 9: CITY OF AUSTIN ORGANIZATIONAL STRUCTURE

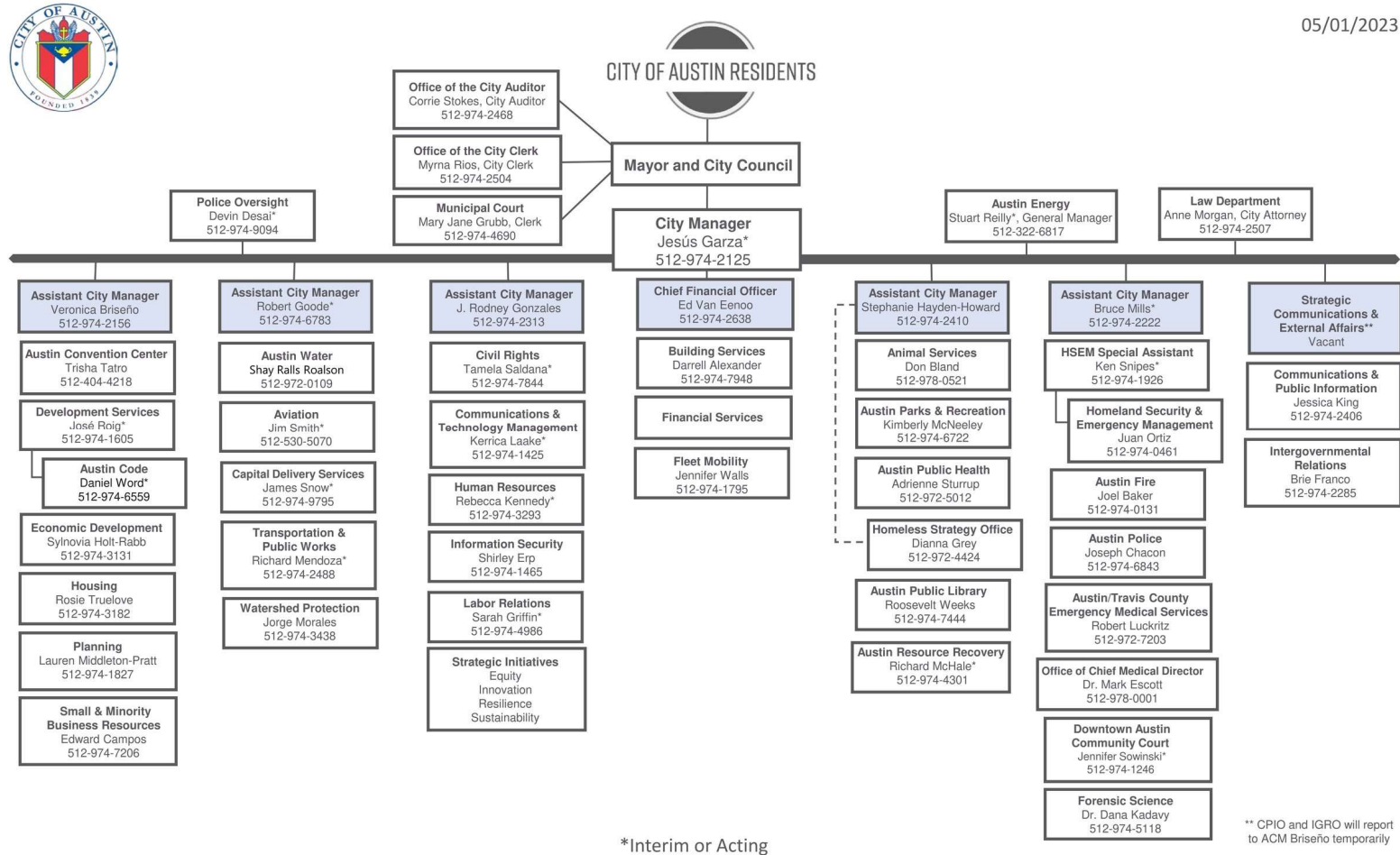


FIGURE 10: CITY OF AUSTIN HOUSING AND PLANNING DEPARTMENT ORGANIZATIONAL STRUCTURE



FIGURE 11: CITY OF DENVER ORGANIZATIONAL STRUCTURE

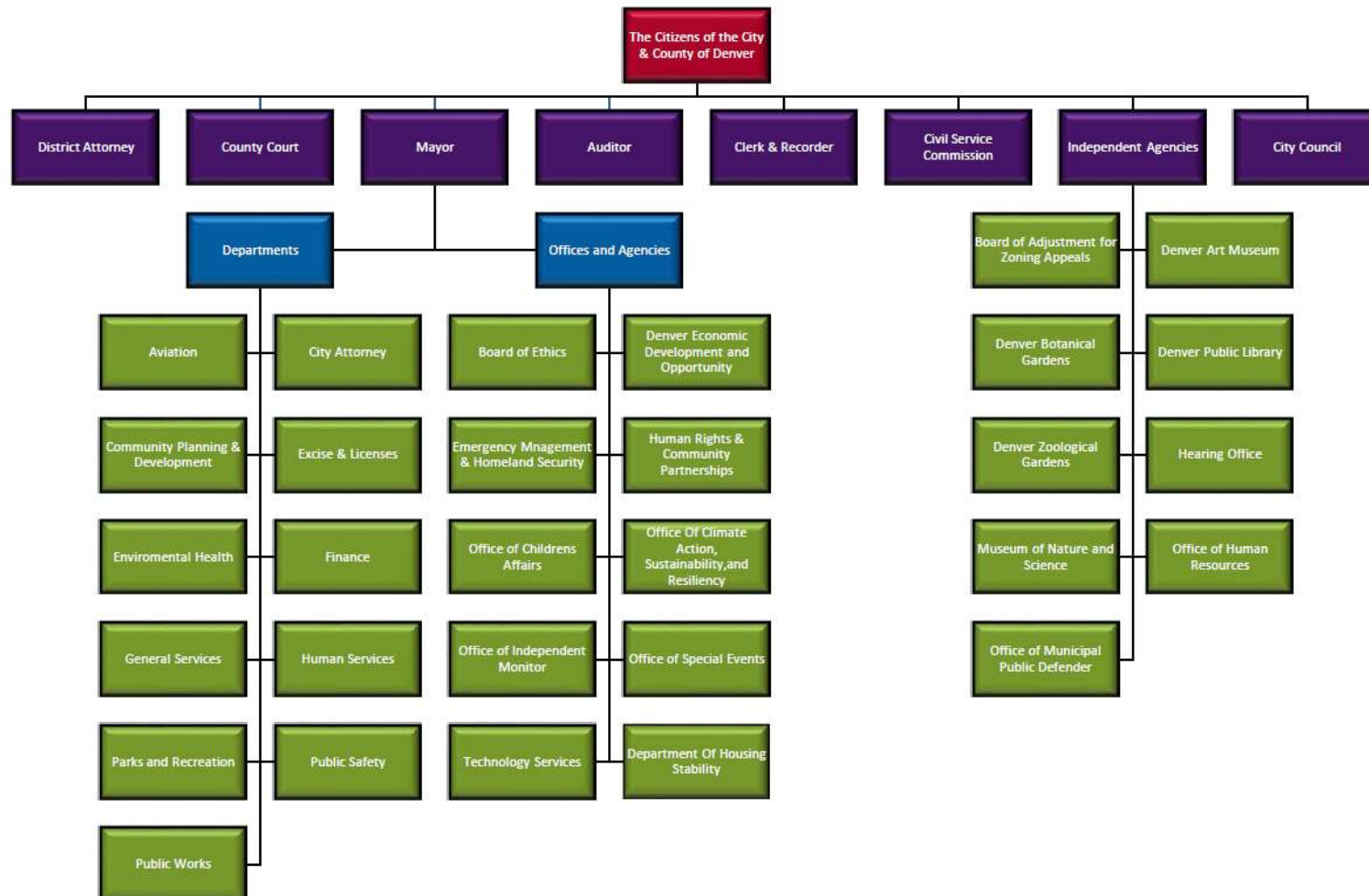


FIGURE 12: CITY OF DENVER DEPARTMENT OF HOUSING SUSTAINABILITY ORGANIZATIONAL STRUCTURE

HOST's four divisions are structured around outcomes we support along the housing continuum and the infrastructure that supports those investments. At right are HOST's divisions linked to contact emails.

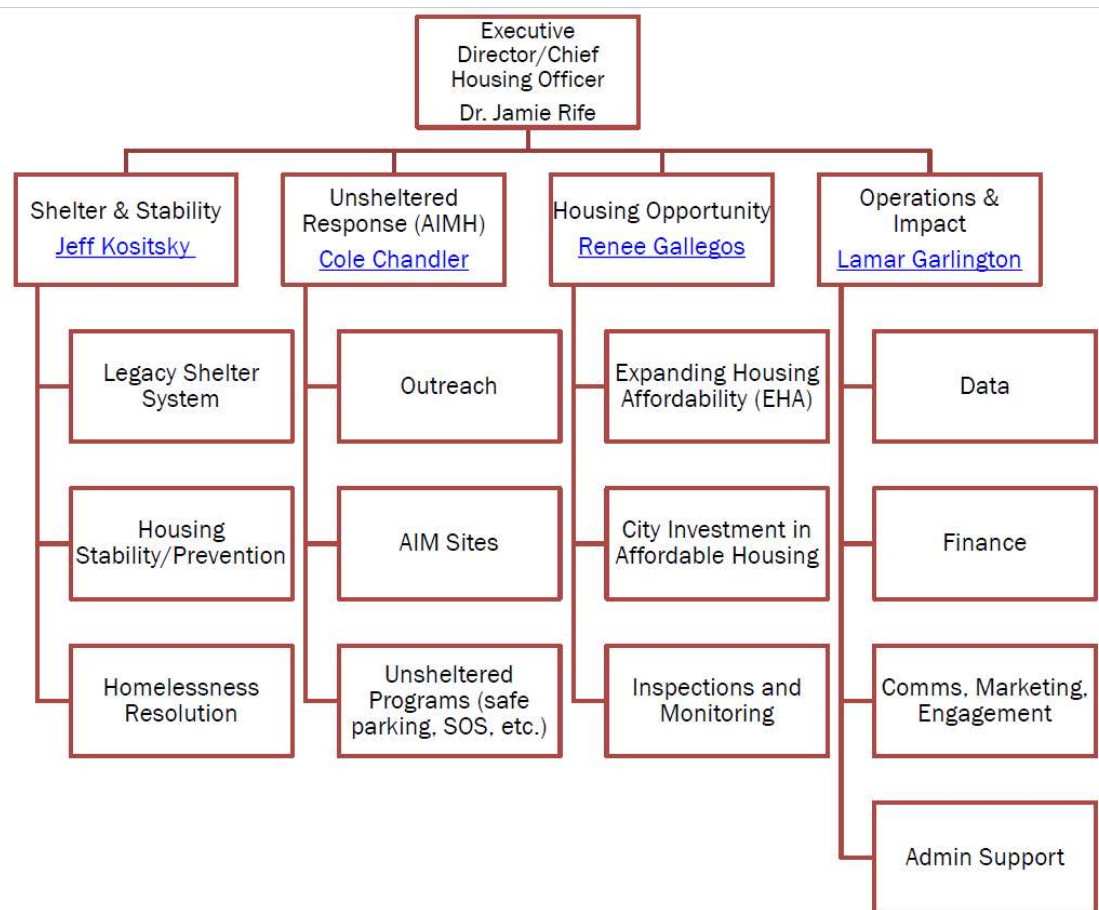


FIGURE 13: CITY OF CHARLOTTE ORGANIZATIONAL STRUCTURE

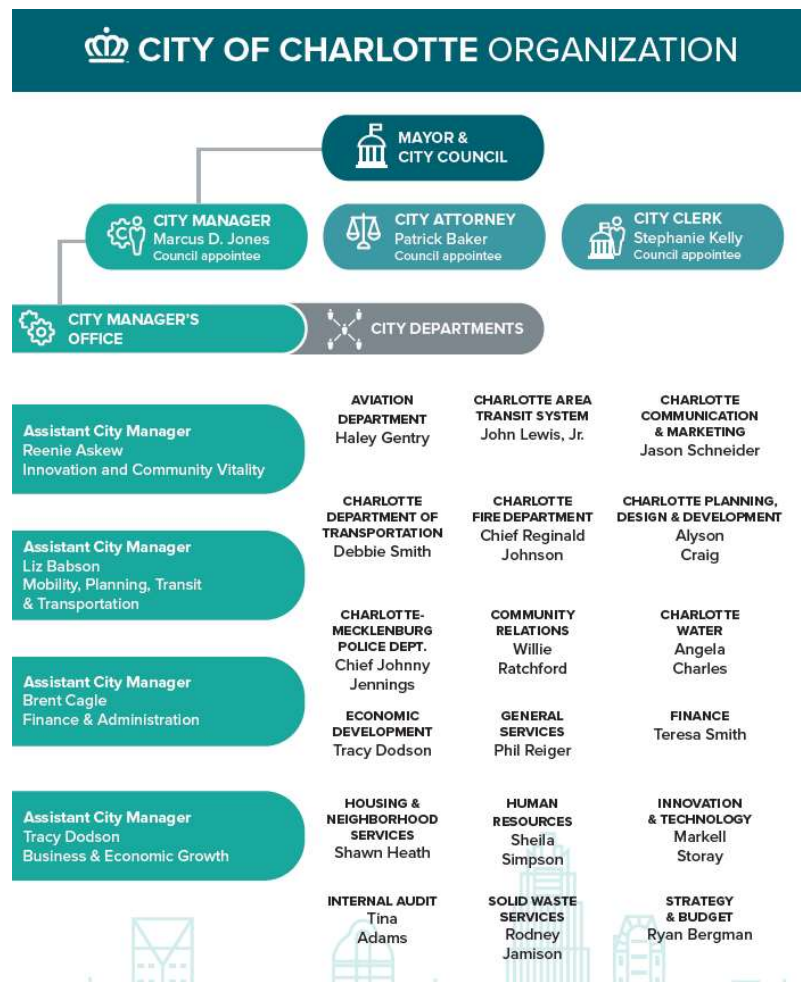


FIGURE 14: CITY OF DALLAS ORGANIZATIONAL STRUCTURE

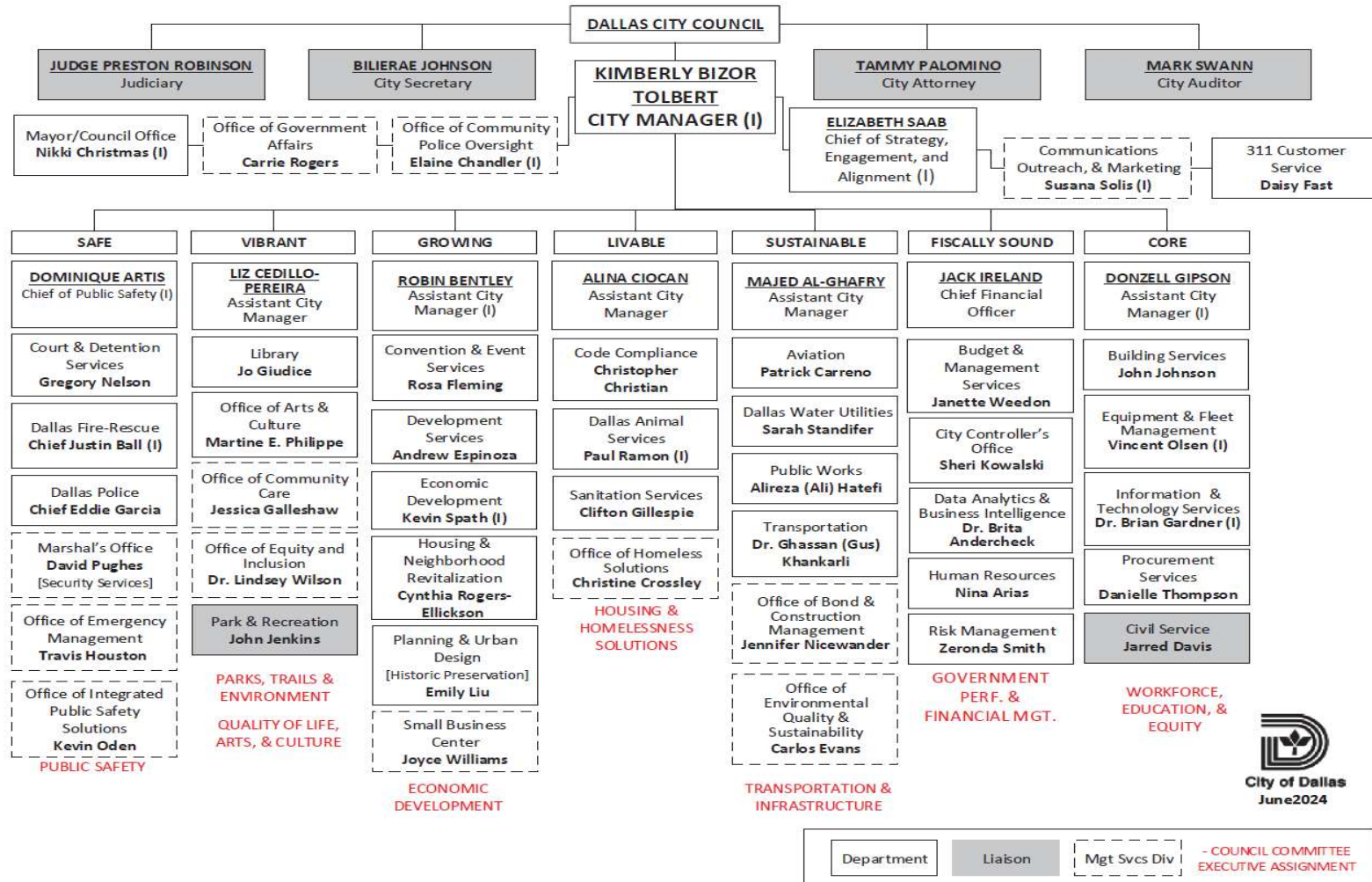
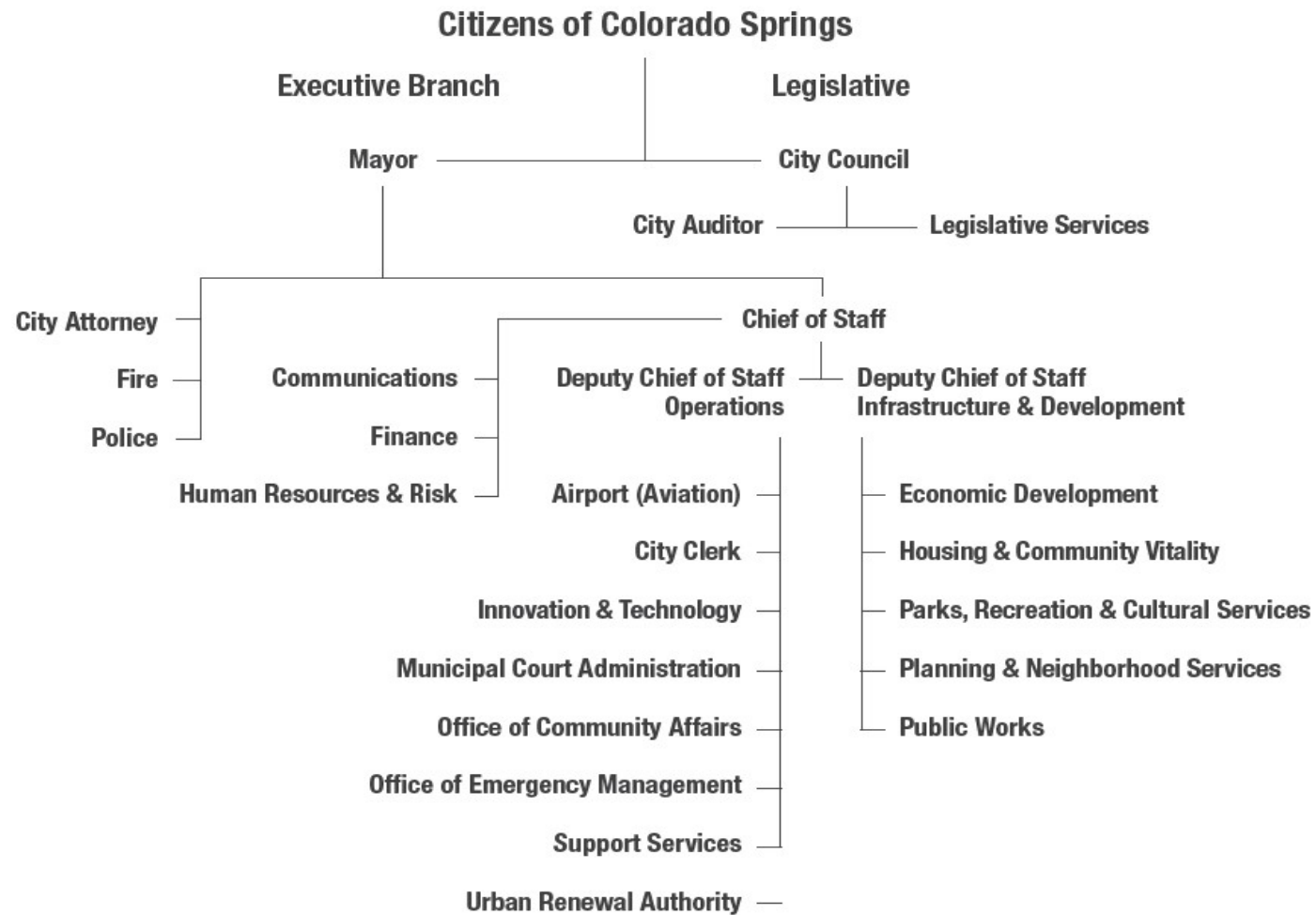


FIGURE 15: CITY OF COLORADO SPRINGS ORGANIZATIONAL STRUCTURE



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Appendix G: Minor Home Rehabilitation

The following are abbreviated examples of programs in other cities that combine local and federal dollars.

TABLE 37: MINOR HOME REHAB PROGRAM DESIGN CONSIDERATIONS

Key Consideration	Description
Maximum assistance amount	Up to a specified dollar amount, e.g., no greater than \$5,000.
Applicant eligibility	<ul style="list-style-type: none"> Must be the owner Must be current on mortgage payments Property taxes must be current AMI limits: must be at or below 80% AMI when HUD funds used; must be at or below 120% AMI when City funds used City employees, including elected officials, ineligible for funds Applicant only eligible every 5 years
Property eligibility	<ul style="list-style-type: none"> Must be detached single-family within City Must obtain environmental clearance Must be in need of repairs as designated under program
Eligible repairs	<ul style="list-style-type: none"> Roofing repair or replacement Ceiling and baseboard holes repair Exterior entry doors replacement or repair, including handles and locks Exterior windows (for broken windows) replacement or repair Accessibility repairs and installation such as ramps, handrails or repairing walkways Water heater replacement or repair Heating /cooling central air system repair, or installation of wall heaters Plumbing, water and sewer pipes, kitchen and bath fixtures repair/replacement Electrical repair/replacement of plugs, breakers, panels, or wiring Gas pipe repair/replacement and gas testing Floor repair Installation of smoke, fire and CO₂ detectors Interior and exterior repairs as needed Any item determined eligible by the Director

Key Consideration	Description
Administration	<p>The administration of the Minor Home Rehabilitation Program shall be performed by non-profit partners that are procured by the City and that have experience providing rehabilitation services and have committed to administering the program citywide, although specific geographies can be considered. The non-profit organization may receive reimbursement of allowable costs as direct delivery for the program in addition to the grants for the applicants, provided the non-profit organization follows the grant requirements as provided by the City. To ensure that the correct program has been selected for the applicant, referrals shall be provided by the City. City administration of the program includes eligibility referrals, application evaluation procedures, ongoing compliance, and other duties as established in the contract, the program guidelines, and the policies and procedures. The City at its sole discretion may inspect that the work was needed and completed, examine cost of repairs for reasonableness, review applicant eligibility and review for compliance with any other program guidelines.</p>

Source: City of Dallas; SGS Economics & Planning, 2025

Appendix H: Major Home Rehabilitation

The Major Home Rehabilitation Program is a forgivable loan program to low- and moderate-income homeowners for the purpose of making needed repairs to preserve affordable housing. Major Home Rehabilitation Program is designed to ensure the longevity of the home and to address health, safety, accessibility modification, reconstruction and structural/deferred maintenance deficiencies. Major Home Rehabilitation Program will improve suitable living conditions, health, and welfare and will expand economic opportunities that revitalize neighborhoods. Funding for this program is provided by HUD CDBG funds (limited to assistance provided to households at or below 80% of area median family income (AMI); and potentially non-federal funds for households at or below 120% AMI. Not to exceed 27% of the HOME Homeownership Value Limits, as established by HUD.

TABLE 38: MINOR HOME REHAB PROGRAM DESIGN CONSIDERATIONS

Key Consideration	Description
Applicant eligibility	<ul style="list-style-type: none"> Must be the owner Must be a US citizen or lawful permanent resident Must not have more than one outstanding loan on property Must be current on mortgage payments Property taxes must be current AMI limits: must be at or below 80% AMI when HUD funds used; must be at or below 120% AMI when City funds used Applicants must correct all code violations not associated with repairs City employees, including elected officials ineligible for funds Priority is given to applicant who have not participated in any City repair, rehab or reconstruction program previously Applicants must be willing to voluntarily relocate at the homeowner's expense Applicant only eligible every 5 years
Property eligibility	<ul style="list-style-type: none"> Must be detached single-family within City Must obtain environmental clearance Standard property insurance must be maintained Applicant must certify that home is not for sale and is the primary residence of applicant Must be in need of repairs as designated under program
Eligible repairs	Eligible rehabilitation activities include items necessary to bring the structure into compliance with the City's written rehabilitation standards and applicable local residential codes; and will also include items recommended

Key Consideration	Description
	<p>as necessary to preserve the property's structural integrity, historic integrity, weatherization, and quality of living conditions. Major systems are part of the scope of work and are identified as structural support (foundations); roofing; cladding and weatherproofing (e.g., windows, doors, siding, gutters); plumbing; electrical; and heating, ventilation, and air conditioning.</p> <p>Demolition of an accessory structure deemed hazardous, such as a detached garage or work shed, will be made on a case-by-case basis depending on the available budget, grant requirements, planning requirements, current building codes, and health and safety concerns. The structure will not be rebuilt by the City.</p> <p>Assistance in removing any items from the property that are considered to be dangerous, hazardous, or a violation of local code is an eligible repair when performed in conjunction with the rehabilitation of eligible improvements on the property.</p> <p>Assistance may not be used for the purchase or repairs of appliances or renovations not necessary to bring the home up to local code or property standards. Ineligible repairs include but are not limited to luxury and recreational items (swimming pools, spas, high end fixtures). Tree trimming will be in conjunction with repair and only if considered necessary and if allowable under the CDBG regulations. Any other ineligible activity may be considered if deemed necessary by the City to undertake an eligible activity, if allowable under the CDBG regulations, as applicable.</p> <ul style="list-style-type: none"> ▪ Cost effective energy conservation measures, including solar heating, cooling, & water systems permanently affixed to dwelling ▪ Testing & treatment/removal of lead-based paint/asbestos hazards ▪ Handicapped improvements & removal of barriers to the handicapped ▪ Removal of termites; removal of rodents and roaches (pest control), but may not be a stand-alone cost ▪ Replace/repair roofing ▪ Replace/repair HVAC systems ▪ Replace/repair plumbing, water and sewer pipes, kitchen and bath fixtures ▪ Replace/repair gas pipes/gas test ▪ Install new smoke, fire, and CO₂ alarms ▪ Install new insulation ▪ Replace/repair flooring and carpeting ▪ Replace/repair water heaters ▪ Replace/repair electrical system and installation of ground fault circuit interrupters ▪ Replace/repair windows ▪ Replace/repair window and/or door screens ▪ Replace/repair plaster, siding and stucco ▪ Painting (inside and outside) ▪ Install new deadbolt locks

Key Consideration	Description
	<ul style="list-style-type: none"> ■ Replace/repair kitchen or bath cabinets and countertops ■ Replace/repair garage doors ■ Structural repairs/modifications (only to correct existing structural code deficiencies or to provide accessibility to disabled persons) ■ Foundation repairs ■ Any items determined eligible by the Director
Terms of assistance	<p>Major Home Rehabilitation Program assistance is an interest-free, forgivable, self-amortizing loan in an amount subject to the City's assessment of needs, not to exceed 27% of HOME Homeownership Value Limits, as established by HUD. The City loan shall be secured by a first or second lien on the property, signed by Applicant as the owner of the property.</p> <p>Loan payments are self-amortized over the ten-year loan term and forgiven annually at the rate of one-tenth of the loan amount for every year the borrower occupies the property continuously as his/her primary residence and complies with the terms and conditions of the contract. The deed restrictions and the deed of trust shall be released on the tenth anniversary of the making of the loan so long as the borrower has met the conditions of the loan, as described under these program requirements, for the entire term. Failure of borrower to occupy the property continuously as his/her primary residence or comply with the terms and conditions of the contract for the entire term shall result in repayment of the unamortized balance of the loan.</p> <p>The affordability period for the Major Home Rehabilitation Program shall be ten (10) years.</p> <p>Applicant shall be required to provide ongoing proof of insurance to the City, with the City as an added insured. Applicant must certify annually that the home is not for sale, is the primary residence of the Applicant, and any other certifications required by the City in the contract, until the balance of the loan is repaid to the City or until the full amount of the loan is forgiven.</p> <p>The administration of the Minor Home Rehabilitation Program shall be performed by non-profit partners that are procured by the City and that have experience providing rehabilitation services and have committed to administering the program citywide, although specific geographies can be considered. The non-profit organization may receive reimbursement of allowable costs as direct delivery for the program in addition to the grants for the applicants, provided the non-profit organization follows the grant requirements as provided by the City. To ensure that the correct program has been selected for the applicant, referrals shall be provided by the City. City administration of the program includes eligibility referrals, application evaluation procedures, ongoing compliance, and other duties as established in the contract, the program guidelines, and the policies and procedures. The City at its sole discretion may inspect that the work was needed and completed, examine cost of repairs for reasonableness, review applicant eligibility and review for compliance with any other program guidelines.</p>

Key Consideration	Description
Administration	<p>The City of Dallas Department of Housing and Neighborhood Revitalization Staff or their designees (“Staff”) shall administer the Major Home Rehabilitation Program. As used herein, the term “Staff” may include either employees or consultants of the department under the direction of the Director (defined below) or his/her designee. The administration of the Major Home Rehabilitation Program includes direct delivery costs, application evaluation procedures, rehabilitation assessments, cost estimation, bid solicitation, contractor selection, construction management, inspection, disbursement of program funds and processing of notices of completion, and other duties as established in the program guidelines as well as the policies and procedures.</p> <p>The Director of Housing and Neighborhood Revitalization (the “Director”) shall be responsible for ensuring that all programs are implemented in accordance with all applicable policies and regulations.</p>

Source: City of Dallas; SGS Economics & Planning, 2025

Appendix I: Rental Rehabilitation

The Rental Rehabilitation Program is an all-inclusive repair and rehabilitation program for single-family rental units, with up to four units per property. It offers a forgivable loan program to landlords who lease to low- to moderate-income households, with the purpose of making needed improvements and preserving affordable housing. The Rental Rehabilitation Program is designed to finance improvements and address health, safety, accessibility modifications, and structural/deferred maintenance deficiencies.

The Director of Housing and Neighborhood Revitalization (the “Director”) shall be responsible for ensuring that all programs are implemented in accordance with all applicable policies and regulations.

TABLE 39: MINOR HOME REHAB PROGRAM DESIGN CONSIDERATIONS

Key Consideration	Description
Applicant eligibility	<ul style="list-style-type: none"> ▪ Applicant must be the owner ▪ Applicant must provide copy of lease agreement with tenant ▪ Applicant and tenants must be US citizens or lawful permanent residents ▪ Tenants must be at or below 80% AMI ▪ Applicant must be willing to correct all code violations ▪ Applicant can apply to repair one or all (four) units as long as the entire structure is brought up to code ▪ City employees, including elected officials ineligible for funds
Property eligibility	<ul style="list-style-type: none"> ▪ Property must be single-family (1-4 units) within the City. (Properties with over 4 units are not eligible for rehabilitation assistance under this program.) ▪ Applicant must be current in their mortgage payments. ▪ Must obtain environmental clearance ▪ Property taxes must be current. ▪ Applicant must register with the Code Compliance Single Family Rental Division, or successor department, as determined by the City. ▪ Applicant must certify that unit(s) are not for sale and that the unit being applied for is occupied by an income-eligible tenant or will be at the completion of construction ▪ Must hold standard property insurance ▪ Applicant must not have more than one outstanding loan on the property. ▪ Applicant not eligible for rehabilitation, if the Applicant’s property was previously assisted with City funds and the property is still within the period of affordability

Key Consideration	Description
	<ul style="list-style-type: none"> Repairs exceeding eighty percent (80%) of improvement value are not eligible
Eligible repairs	<p>Eligible rehabilitation activities include items necessary to bring the structure into compliance with the City’s written rehabilitation standards and applicable local residential codes and will also include items recommended as necessary to preserve the property’s structural integrity, historic integrity, weatherization, and quality of living conditions. Major systems are part of the scope of work and are identified as structural support (foundations); roofing; cladding and weatherproofing (e.g., windows, doors, siding, gutters); plumbing; electrical; and heating, ventilation, and air conditioning.</p> <p>Demolition of an accessory structure deemed hazardous, such as a detached garage or work shed, will be made on a case-by-case basis depending on the available budget, grant requirements, planning requirements, current building codes, and health and safety concerns. The structure will not be rebuilt by the City.</p> <p>Assistance in removing any items from the property that are considered to be dangerous, hazardous, or a violation of local code is an eligible repair when performed in conjunction with the rehabilitation of eligible improvements on the property.</p> <p>Assistance may not be used for the purchase or repairs of appliances or renovations not necessary to bring the unit up to local code or property standards. Ineligible repairs include but are not limited to luxury and recreational items (swimming pools, spas, high end fixtures). Tree trimming will be in conjunction with repair and only if considered necessary and if allowable under the applicable regulations. Any other ineligible activity may be considered if deemed necessary by the City to undertake an eligible activity, if allowable under the applicable regulations, as applicable.</p> <p>Rental Rehabilitation Program funds may only be used to complete the project-related hard costs such as construction costs. Project-related soft costs such as hazardous materials testing fees, document recordation fees, inspection/construction management fees, or escrow fees shall not be included as part of the loan provided to the Applicant. These costs shall be provided by the City as part of its delivery costs. These costs are program delivery cost of the City, such cost will not be included in the loan amount. Applicant must certify annually that the home is not for sale and is the primary residence of the tenant until the loan is repaid to the City in full. Applicant must also correct all code violations that exist on the property.</p> <ul style="list-style-type: none"> Cost effective energy conservation measures, including solar heating, cooling, & water systems permanently affixed to dwelling Testing & treatment/removal of lead-based paint/asbestos hazards Handicapped improvements & removal of barriers to the handicapped Removal of termites; removal of rodents and roaches (pest control), but may not be a stand-alone cost Replace/repair roofing

Key Consideration	Description
	<ul style="list-style-type: none"> ▪ Replace/repair HVAC systems ▪ Replace/repair plumbing, water and sewer pipes, kitchen and bath fixtures ▪ Replace/repair gas pipes/gas test ▪ Install new smoke, fire, and CO2 alarms ▪ Install new insulation ▪ Replace/repair flooring and carpeting ▪ Replace/repair water heaters ▪ Replace/repair electrical system and installation of ground fault circuit interrupters ▪ Replace/repair windows ▪ Replace/repair window and/or door screens ▪ Replace/repair plaster, siding and stucco ▪ Painting (inside and outside) ▪ Install new deadbolt locks ▪ Replace/repair kitchen or bath cabinets and countertops ▪ Replace/repair garage doors ▪ Structural repairs/modifications (only to correct existing structural code deficiencies or to provide accessibility to disabled persons) ▪ Foundation repairs ▪ Any items determined eligible by the Director
Terms of assistance	<p>The Rental Rehabilitation Program assistance is an interest-free, forgivable, self-amortizing loan in an amount subject to the City's assessment of needs. The City loan shall be secured by a first or second lien on the property, signed by Applicant as the owner of the property. Landlord must rent to an income eligible renter for the duration of the affordability period. Landlord must certify annually that it is in compliance with the terms until the loan is repaid to the City in full or forgiven, as detailed below. Landlord must also correct all code violations that exist on the property. The maximum loan assistance amount not to exceed 27% of HOME Homeownership Value Limits and not to exceed 80% of the Appraisal District Improvement Value, not to exceed 4 units per address.</p> <p>Loan payments are self-amortized over the ten-year loan term and forgiven annually at the rate of one-tenth of the loan amount for every year the Applicant leases to low-income households, the Applicant remains the owner of the property and complies with the terms and conditions of the contract. The deed restrictions and the deed of trust may be released on the tenth anniversary of the making of the loan, so long as the Applicant has met the conditions of the loan, as described under these program requirements, for the entire term, as determined by the City. Failure of Applicant to rent the property continuously to income qualified residents or comply with the terms and conditions of the contract for the entire term, shall result in repayment of the unamortized balance of the loan. Short-term vacancies between tenants may be allowed, as determined by the City, on a case-by-case basis.</p>

Key Consideration	Description
	<p>The City shall perform required monitoring during the ten-year period of affordability. Applicant shall also be required to provide ongoing proof of insurance to the City, with the City as an added insured. Applicant must certify annually that the home is not for sale, the Applicant is leasing to low-income households, and Applicant remains the owner of the property, and any other certifications required by the City in the contract, until the balance of the loan is repaid to the City or until the full amount of the loan is forgiven.</p> <p>Applicant may repay the Rental Rehabilitation Program loan at any time without penalty. All loans are immediately payable upon the earlier of:</p> <ul style="list-style-type: none"> ▪ Upon transfer of the property, whether voluntary or involuntary, including but not limited to the sale, conveyance, transfer, or hypothecation of the security; or ▪ If the home is vacated during the term of the loan, in excess of the short-term vacancies approved by the City, or if it is not rented to an income eligible tenant; or ▪ Failure to adhere to the provisions of the loan agreements; or ▪ If standard property insurance, satisfactory to the City, is not maintained on the property; or ▪ Failure to adhere to the provisions under the City’s contract, deed restrictions, deed of trust and/or the note.
Tenant relocation during affordability period	<p>If a tenant relocates for any reason during the affordability period, the Applicant shall have the responsibility of obtaining a new tenant that meets all Rental Rehabilitation Program requirements within the timeframe specified by the City.</p>
Temporary relocation during rehabilitation	<p>Relocation is not contemplated for rehabilitation activities, however if an unanticipated event occurs which requires temporary relocation, Applicant shall be responsible for the relocation-related expenses and fees. Applicant shall perform such relocation obligations in compliance with the provisions of the Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970 and Section 104(d) and any other applicable state, federal, or local laws/regulations.</p>

Source: City of Dallas; SGS Economics & Planning, 2025

Appendix J: Targeted Homebuyer Incentive

This program offers financial assistance for those in educational instruction and library occupations; healthcare practitioners and technical occupations; healthcare support occupations; and protective service occupations, including but not limited to fire fighters and police officers, who purchase a property in the City of Dallas. Applicants with an income up to 120% AMI who qualify for this program may receive down payment assistance funds up to \$45,000. Applicants who receive assistance using federal funds are subject to the rules of the “Dallas Homebuyer Assistance Program”.

TABLE 40: TARGETED HOMEBUYER ASSISTANCE PROGRAM DESIGN CONSIDERATIONS

Key Consideration	Description
Applicant eligibility	<ul style="list-style-type: none"> Property must be located within City Household income must not exceed 120% AMI Applicants must have acceptable credit (sub-prime loans, ARMs, interest only loans not allowed) Applicants must demonstrate they have at least 2 months cash available equal to mortgage payment, including principal, interest, taxes, insurance and fees. Must be a US citizen or lawful permanent resident City employees, including elected officials ineligible for funds Property must be purchased for primary residence Applicant must attend 8 hours of homeownership education class by HUD-certified counselling agency Applicant must make minimum of \$1,000 investment toward home purchase
Affordability period	The residence must remain affordable for 5 years
Credit underwriting standards	<ul style="list-style-type: none"> No Chapter 7 or Chapter 13 bankruptcy if primary or any mortgage is included as a secured creditor on the subject property for which the City will place a lien securing the loan. Predatory lending describes lending practices that take advantage of clients by charging usurious interest rates or excessive fees and penalties. Loans will not be made with an interest rate more than 2% above the prevailing market rate. First mortgage amount must have a front-end ratio of up to 32% First mortgage amount must have a back-end ratio no higher than 45%

Source: City of Dallas; SGS Economics & Planning, 2025

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Appendix K: Substantial Rehabilitation

Provides financial assistance to new developments and substantial rehabilitation of existing property, where such assistance is necessary, and to appropriately incentivize private investment for the development of high quality, sustainable housing that is affordable to the residents of the City.

Funds are eligible for:

- Building new single-family developments with 5 or more units
- Building new or substantially rehabilitating multifamily rental housing with 5 or more units (for rehabilitation, buildings must meet a substantial rehabilitation test)

The City shall award funds, when available, through a competitive Notice of Funding Availability (NOFA) or a Request for Applications (RFA) process in accordance with the program's scoring policy. The scoring policy shall be determined by the City's development priorities and clearly outlined in the corresponding NOFA or RFA.

TABLE 41: TARGETED HOMEBUYER ASSISTANCE PROGRAM DESIGN CONSIDERATIONS

Key Consideration	Description
Eligibility	<p>The substantial rehabilitation test thresholds are:</p> <ul style="list-style-type: none"> ▪ Replacement of two or more major building components (roof; wall or floor structures; foundations; plumbing, central HVAC or electrical system); or ▪ costs are 15% or more, exclusive of any acquisition and/or acquisition and development soft costs, of the property's replacement cost (fair market value) after completion of all required repairs, replacements and improvements; or ▪ rehabilitation hard costs are \$10,000 or more per unit.
Loan terms	<p>Financial assistance can be provided in the form of a repayable loan as negotiated on a project-by-project basis and demonstrated by the financial underwriting.</p> <ul style="list-style-type: none"> ▪ The City loan is fully repayable, and the interest rate varies by the type of Borrower. ▪ The City may structure loans for projects including permanent supportive housing units as forgivable loans. ▪ The interest rate for a qualified CHDO Borrower or Sponsor shall be zero percent (0%) simple annual interest. ▪ The interest rate for a qualified nonprofit Borrower or Sponsors shall be one percent (1%) simple annual interest.

Key Consideration	Description
	<ul style="list-style-type: none"> ▪ The base interest rate for all other Borrowers shall be three percent (3%). However, the 3% base rate can be reduced through a combination of one or more Borrower concessions: <ul style="list-style-type: none"> - A Borrower guarantee to make annual interest payments will reduce base interest rate by 1%; - Borrower agreement to limit loan maturity to 20 years or less reduces base interest rate by 1%; or - Borrower guarantee of annual interest and principal payments reduces base interest rate by 2%.
Loan conditions	<ul style="list-style-type: none"> ▪ Rent properties in accordance with HUD Section 8 guidelines ▪ Not discriminate on basis of race, religion or national origin ▪ Comply with City code ▪ Not discriminate against lower income households or their receipt of vouchers ▪ Not convert the rental property to condominiums for the duration of the loan ▪ Maintain habitability standards, complying with code ▪ Provide evidence of having paid property taxes ▪ Secure fire and extended insurance ▪ Annually comply with re-certification of tenant incomes ▪ Conduct property inspection 1 year after rehab and every 2 years thereafter
Affordability requirements	<ul style="list-style-type: none"> ▪ Less than \$15k/unit – 5 years ▪ \$15k-\$40k/unit – 10 years ▪ More than \$40k/unit – 15 years

Source: City of Dallas; SGS Economics & Planning, 2025



Independent
insight.



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