

The City of Oklahoma City

2019-2020 Fifth Action Year

Strategic Plan for Year 2019-2020
Presented to the U.S. Department of Housing and Urban Development
Oklahoma City Field Office of Community Planning and Development



Strategic Plan Submission Date: June 10, 2019



Executive Summary

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

1. Introduction

The City of Oklahoma City (the City) is a federal Entitlement Community under the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant (CDBG) program. In conjunction with CDBG and HOME Investment Partnerships Act (HOME) Programs, the City must prepare a Consolidated Plan every five (5) years for submittal to HUD. The Consolidated Plan provides an updated community-based analysis of demographics, economic, and public policy trends, and a timely reassessment of the needs of low and moderate-income populations relating to housing, shelter, public service, and economic development opportunities. This analysis, along with input received during a comprehensive citizen and stakeholder consultation process, forms the foundation of the City's five (5) year strategic plan for addressing unmet community needs.

Each year of the five (5) year strategy, the City must prepare an annual Action Plan to inform citizens and HUD of planned activities for the program year. Each Action Plan is due to HUD annually by May 15th, unless otherwise extended by HUD. The Action Plan serves as the City's application for CDBG and HOME funds. Regulations governing the CDBG program require that each activity undertaken must meet one of the following three (3) National Objectives: Benefit people with low and moderate incomes, Aid in the prevention or elimination of slums and blight, or Meet an urgent need (such as earthquake, flood, or tornado relief).

The HOME program supports the development of affordable housing, expands capacity of affordable housing developers, and leverages private sector investment. The Housing Opportunities for Persons with HIV/AIDS (HOPWA) program is the only Federal program dedicated to addressing the housing needs of persons living with HIV/AIDS and their families. Grantees partner with nonprofit organizations and housing agencies to provide housing and support to these beneficiaries.

The Emergency Solutions Grant (ESG) program provides funding to: (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters; (4) provide essential services to shelter residents; (5) rapidly re-house homeless individuals and families; and (6) prevent families and individuals from becoming homeless.

The Consolidated Plan details the City's strategy for meeting CDBG National Objectives and HOME program goals, as well as identifying proposed uses for ESG and HOPWA grant funds. Funding provided through HOME, CDBG, ESG, and HOPWA is crucial to the City's ability to meet community needs. The

five (5) year Consolidated Plan prioritizes housing as a primary objective, specifically within the Neighborhood Revitalization Strategy Area (NRSA) and the Strong Neighborhoods Initiative (SNI) neighborhoods where 80% of available grant resources are targeted. Each Annual Action Plan Year, funding recommendations are reviewed and vetted according to the goals and objectives of the Consolidated Plan.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The City strives to concentrate resources strategically within the SNI neighborhoods to promote a holistic approach to neighborhood revitalization. In the 2019-20 Fifth Action Plan Year, the City of Oklahoma City continues to place emphasis on affordable housing, with specific emphasis on the Neighborhood Revitalization Strategy Area (NRSA).

HOME funding has been allocated for down payment assistance to low to moderate income homebuyers, non-profit housing construction/rehabilitation, and rehabilitation of owner-occupied homes. CDBG funds have been used to support public service activities which continue to be a priority of the community. Funding has been allocated for free and reduced bus and taxi fares for special populations, graffiti removal, securing abandoned houses, after school programming, hazardous tree removal, legal assistance, healthcare for homeless and public education. Several public facilities projects were completed in the prior year, including new sidewalks and park improvements in SNI neighborhoods. No new public facilities projects are immediately identified for funding in the Fifth Action Plan Year, however new projects are being vetted under an open solicitation which has not yet closed. Funds allocated to prior year activities for Kiwanis and the Metro Alliance are carried forward to the new program year.

The City of Oklahoma City continues to support economic development activities using CDBG funding. CDBG funded activities include small business training; support for the Urban Renewal Authority (to include slum and blight removal, urban renewal completion, and Low-moderate income housing, and low mod area benefit; and Section 108 loan fund contingency. An economic development revolving loan fund established to support small businesses within approved commercial district revitalization areas has not performed as expected. There are two applications currently in process; if one or both of these are not funded, remaining dollars will be recaptured and made available to other projects in the Fifth Action Plan Year.

ESG funding continues to support a myriad of activities to address chronic homelessness, and HOPWA funds have been allocated to provide Tenant Based Rental Assistance (TBRA) and Short-Term Rental, Mortgage, and Utilities assistance to persons with HIV/AIDS.

A substantial amendment may sometimes be required as the City adapts to changing needs and priorities within an Action Plan year. A substantial amendment to the Consolidated Plan is defined as an amendment that a.) adds a new sub-grantee; b.) transfers funds from one funded activity to another new or existing project, *and* in which an individual line item adjustment results in an increase or decrease of more than 30% to either of the current or newly funded project; or c.) cancels an activity.

In April 2019, City Council approved a Substantial Amendment to the 2018-19 Fourth Year Action Plan to establish a Section 108 Loan program for the First National Center to facilitate future payment of certain pre-award soft costs, subject to HUD approval of a Section 108 loan application. No funds are anticipated to be expended during the Fifth Year Action Plan program year. The Substantial Amendment also authorized a storm shelter program (to be discontinued in the new program year) and reallocated \$33,100 from the Home Exterior Maintenance Program for activities already underway. Lastly, the Substantial Amendment authorized the creation of a new Housing Services Program which allows Oklahoma City housing rehabilitation staff to perform property inspections on certain housing units owned by the Oklahoma City Housing Authority.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects

The 2015-20 Five (5) Year Consolidated Plan includes strategies, with a focus on low and moderate income individuals and families, to provide safe, decent and affordable housing; to end homelessness by moving individuals and families to permanent housing; to provide a safe and suitable living environment with adequate public facilities and services; and, to expand economic opportunities by providing financial resources and technical assistance to businesses with particular focus in the Neighborhood Revitalization Strategy Area (NRSA) and SNI neighborhoods. The City of Oklahoma City has been successful in attaining the goals and objectives in the 2015-20 Consolidated Plan and the First four (4) Action Plan Year strategies.

Activities undertaken have addressed overall program goals and include the provision of decent housing and a suitable living environment, and expanding economic opportunities principally for persons of low and moderate income. The Consolidated Plan and associated Annual Action Year Plans have addressed **housing goals** by providing funding and engaging in program activities that include support for nonprofit and for-profit housing developers to rehabilitate and construct new affordable housing; support for CHDOs to rehabilitate and construct new affordable housing; support for the Oklahoma City Housing Authority to modernize public housing units; funding to assist with emergency repairs of housing; support for down payment and closing cost assistance to expand homeownership opportunities; funding for activities that support the City's housing rehabilitation program, and housing for persons with HIV/AIDS. Activities undertaken in the 2018-19 Fourth Action Plan Year addressed these goals and are on target to meet projected outcomes.

The goal of providing a **suitable living environment** was addressed in the first four (4) Action Year Plans by continuing ongoing programs that address specific community needs. The 2018-19 Fourth Action Plan Year strategy continued support for homeless services through the Emergency Solutions Grant Program; the Continuum of Care Program; discounted taxi coupons for elderly, disabled and sight impaired persons under the City's Share-A-Fare program; bus passes and discounted taxi service for homeless individuals and families; local funding of neighborhood capacity building activities in SNI neighborhoods; CDBG funding to provide neighborhood improvements; activities to address vacant and abandoned housing; removal of graffiti; and, abatement of slum and blight conditions in low-income areas.

The City of Oklahoma City also made progress in attaining its goals for **expanding economic opportunities**. The City's Consolidated Plan and Annual Action Year Strategies support program activities that provide technical assistance to small businesses and investing Section 108 Loan Guarantee funds in businesses to create jobs for low and moderate-income persons. A Section 108 loan application for renovation of the historic First National Building was received and vetted by staff; modifications to the application for further review is expected in the upcoming Action Year

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

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

1. To provide citizens with reasonable and timely access to local meetings, information, and records relating to the City's proposed use of Federal grant program funds administered by the City, as required by the Secretary of HUD, and relating to the actual use of funds under the Housing and Community Development Act (HCDA), etc., as amended;
2. To provide technical assistance to groups representing persons of low/moderate income in developing proposals for funding opportunities;
3. To provide for public meetings and public hearings to obtain citizen views and to respond to proposals/questions at all stages of the community development process. This includes the identification of needs, development and review of proposed activities, and evaluation of program performance. Hearings are held after adequate notice, at times and locations convenient to potential or actual beneficiaries and with accommodation for minorities and non-English speaking persons, as well as persons with mobility, visual or hearing impairments in all stages of the process;

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

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

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

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

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

A summary of community input is attached to this report (Appendix 2). Consultation with outside agencies and other municipalities is discussed in Section PR-10 of the 2015-2020 Consolidated Plan.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

The public participation process for completing the 2019-2020 Fifth Action Plan Year began in January 2019 with the publication of a Notice of Public Meetings for two (2) community input sessions held at Sunbeam Family Services facility on January 22, 2019 at 6:00 p.m., and January 24, 2019 at 3:00 p.m. Meetings were held at varying times, with one meeting held during the afternoon to accommodate persons working evening hours. A total of twenty-seven (27) citizens and representatives of local organizations and service providers attended these meetings. Six (6) Staff members were present at each of the meetings. Citizen input touched on several topics which are itemized in the attached appendix (Appendix 2). The most common questions related to continued investment in social services, affordable housing shortages (specifically for persons transitioning from addiction programs and homelessness), quality of affordable rental housing, issues confronting homeless youth, legal aid services, and the availability of public transportation. Support was expressed for ongoing support in SNI neighborhoods and commenters requested continued improvement in addressing the issues associated with homelessness.

Additional opportunity for community input was provided during discussion of preliminary funding allocation estimates at the Citizens Committee for Community Development (CCCD) meeting on March 12, 2019. Final recommendations from Staff after HUD's announcement of formula grant allocations on April 15th were presented to the CCCD on May 8, 2019 with additional opportunity for public input. A thirty (30) day Notice seeking public comment on the proposed Action Plan and providing notification of a final public hearing at City Council was published in *The Oklahoman* on May 3, 2019. In addition to opportunities provided at public meetings, Staff accepted written correspondence from the public until 5:00 p.m. on May 10, 2019. A final opportunity for input was provided in a public hearing before City Council on June 4, 2019 at the time of final Action Plan approval.

The Oklahoma City Housing Authority, Community Action Agency, YWCA and the Association of Central Oklahoma Governments were consulted by City Staff during the preparation of the Five Year Consolidated Plan in 2015 to obtain input about unmet needs, available resources, strategic priorities, and opportunities for collaboration. City Staff met with representatives from the YWCA and the State Attorney General's office to further discuss their concerns about housing for domestic violence victims. Suburban entitlement communities, the State of Oklahoma Department of Commerce and regional planning organizations within the Oklahoma City MSA were provided information about Oklahoma City's first year funding activities and five (5) year priority needs and encouraged to respond with questions or concerns. One (1) significant response was received from the City of Midwest City proposing greater regional collaboration to address issues related to homelessness. Staff has continued to rely upon feedback obtained during the 2015 Consolidated Plan process and will continue to respond appropriately in this Fifth and final Action Plan Year as citizens and service providers share concerns about funding allocations and associated needs. Discussions will begin in Fall 2019 to establish priorities for the 2020-2025 Five Year Consolidated Plan.

All public comments and Staff's responses are included in the Attached Appendix (Appendix 2). No public comments were received at the final public hearing on June 4, 2019.

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

Concerns were expressed at the first public participation meeting about the lack of resources provided for transitional housing. Staff responded that many needs in the community, specifically those related to administration and operations required to assist persons transitioning from addiction programs and homelessness, are difficult to fund. CDBG funds are subject to a 15% public services cap which limits capacity, and the expectation for continued public service commitments in future years can be challenging in an era of declining resources. In addition, subrecipients must demonstrate both financial and organizational capacity to ensure non-dependence on federal funds, as funding in future program years cannot be guaranteed. Although the City of Oklahoma City is sensitive to the need for additional public services support, we were unable to fund multiple new activities.

Commenters also expressed that there is a critical need for short term rental and utility assistance. Several service providers currently offer limited assistance programs, but the need far outweighs available resources. Staff responded that Tenant Based Rental Assistance (TBRA) is an eligible activity under the HOME program, but the City has not previously used HOME funds in this way. TBRA and Short Term Rental, Mortgage and Utility (STRMU) assistance has historically been provided to a limited population under the Housing Opportunities for Persons with Aids (HOPWA) program for persons facing an HIV/AIDS related housing crisis. Staff is currently exploring potential opportunities under the HOME or CDBG program to address this unmet need and will consider future support subject to available resources and administrative capacity.

On a positive note, comments were received about the effectiveness of the SNI program and the desire to see these activities remain fully funded in future years as new neighborhoods are identified and targeted for support. As work has been completed in the Classen's North Highland Park Neighborhood and in the Classen Ten Penn Neighborhood, City Council has approved the Capital View and Capitol Hill neighborhoods for SNI support. Preliminary activities in these neighborhoods began in the Fourth Action Plan Year and will see increased activity in the Fifth Action Year Plan. Work in the Culbertson neighborhood will also continue. However, comments were made that additional neighborhoods should also be given funding for projects.

All public feedback was given due consideration, although not every requested activity could be funded. Some comments and suggestions resulted in competing goals and perspectives, requiring either substantial compromise between two worthy alternatives, or rejection of a viewpoint not in conformance with the larger majority. Other suggestions were non-compliant with program regulations and/or strategic goals. The need for greater community investment is apparent; however, resources (both monetarily and administratively) are insufficient at present to enlarge the targeted neighborhood boundaries.

7. Summary

Oklahoma City's strategic mission for community development is to facilitate community revitalization, and to ensure the provision of decent housing, a suitable living environment and expanded economic opportunity for all residents. During the first two Action Plan Years, falling commodities prices, specifically the price of crude, adversely impacted local growth due to the City's disproportionate reliance on the energy industry. Declining oil prices led to substantial corporate layoffs among some of the City's largest employers, and a significant decrease in sales tax revenues at both the state and local levels. Development continued, albeit at a slower pace; however, multiple large-scale project proposals were terminated, scaled back, or postponed indefinitely. During the Third and Fourth Action Plan Years, sales tax revenues gradually rebounded, and the economy shows signs of renewed interest in development. As we enter this Fifth Action Plan Year, sales tax revenue is on the incline and we remain optimistic that the economy will continue to improve. However, political opposition the CDBG and HOME programs continue to cause concern about the City's future ability to provide support for

affordable housing activities. Land costs and the cost of labor and materials continue to rise. As a result, developers are inclined to construct higher end units targeted to upper end wage earners, thereby increasing the gap in affordability.

At the beginning of 2019, multifamily demand continued to be robust.* There were no alarming signs of inflation and unemployment rates continued at historical lows. As of the third quarter 2018, homeownership rates increased only slightly from the 2017 level of 63.9% to 64.4%. The shortage of single family homes, especially those priced affordably for first time homebuyers, continues to drive strong demand in the rental market.

Debt financing for apartment assets continues to be widely available. Recently passed tax reform measures, including the creation of Opportunity Zones, create the potential for generating additional capital into multi-family investments. The State Legislature also recently passed HB 1411, which will expand the area of eligibility to access the State Affordable Housing Tax Credit to projects in Oklahoma City.

2018 occupancy rate on rental units was virtually unchanged from 2017. In a survey of 74,490 market units across 341 properties, Price Edwards identified an average rental rate of \$0.90 per square foot within the Oklahoma City metropolitan area, representing a 2.27% increase from 2017. Concessions have declined significantly from 18% to 1.7%. Over the course of the year, the market absorbed a total of 1,199 units yielding a market average occupancy of 90% at year-end. There are 1,024 new rental units scheduled to open in 2019. HUD loans are becoming more elusive as the market appears to be tapering off.

Rents have trended slightly upwards; however, tightening is expected in 2019 as development slows and new units are absorbed in the market. In the urban core, the Steelyard project was completed and opened their second phase adding 97 rental units in the Bricktown Entertainment District. Occupancy at the end of the third quarter was reported at 89%. The market has demonstrated a 3% effective growth rate for the past thirty (30) years and is expected to continue that trajectory for the foreseeable future. Demand for rental units is expected to center on projects that serve the traditional workforce.

**All statistics and market analysis quoted in this section have been redacted from the Price Edwards & Company, Oklahoma City Multifamily Market Survey, 2018 released in February 2019; accessed on May 16, 2019 at <http://www.priceedwards.com/system/files/2019-02/2018%20Year-End%20OKC%20Multifamily%20and%20Expense%20Survey%20-%20Web.pdf> .*

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

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

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

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

Table 1 – Responsible Agencies

Narrative (optional)

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

Consolidated Plan Public Contact Information

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

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

1. Introduction

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

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

The City routinely communicates with the Oklahoma City Housing Authority (OCHA) to understand their programs and needs. The City continues to provide them with funding each year to rehabilitate some public housing units as indicated within our Action Plan. The OCHA has housing units in the City’s SNI neighborhoods, and we have discussed with them the potential for exterior improvements to help the neighborhood. We have also planted trees on several OCHA properties within the SNI as part of our neighborhood tree planting initiative. Prior discussions have been held with OCHA to consider the possibility of jointly applying for a future Choice Neighborhood Grant. The City is also collaborating with the Oklahoma City Housing Authority about affordable housing needs and priorities. The Substantial Amendment approved by City Council in April 2019 supports a partnership between The City and OCHA to provide property inspections for OCHA housing units.

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

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

The City has collaborated with representatives of the Oklahoma Department of Mental Health and Substance Abuse to share information and work more effectively together. Recently, representatives of the Oklahoma State Department of Health met with City staff to discuss lead hazard concerns and the potential of future partnership in this area.

Besides the Continuum of Care Committee, Housing & Community Development Division staff participate in the Coalition to End Poverty, and the Governor's Interagency Council on Homelessness which serves as a forum for communication with representatives from state agencies, community organizations, and non-profits. In 2019, the Mayor established a new Task Force on Homelessness to examine and address community needs. Task Force members represent a variety of social service agencies including mental health providers, the housing authority, city program staff, and philanthropic funding agencies. The City recently issued a Request for Proposals for a consultant agency to perform a needs assessment of current conditions in the city and develop a Comprehensive Strategy to address Homelessness. This study is to be underway in 2019, to be completed in 2020.

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

The City of Oklahoma City is the lead agency for the Oklahoma City Continuum of Care. The City has placed an emphasis on housing the chronically homeless and veterans using a housing first approach since joining the 100,000 homes campaign in 2013. Since then, over 200 chronically homeless individuals have been housed with a retention rate of near 90%. Housing homeless veterans has also been a program emphasis and the CoC coordinates with the Veteran's Administration for VASH vouchers and case management. Additionally, the City will be collaborating increasingly with Goodwill to provide services to veteran's families as Goodwill is the local provider of the Supportive Services for Veteran's Families grantee.

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

The OKC CoC increasingly focuses on homeless youth. Be The Change, the City's primary outreach provider has, with an ESG grant, operated a youth outreach program for the last three years. In recent years the Homeless Youth Alliance was formed by a group of local non-profit and government organizations focused on addressing the needs of homeless youth. Since then, Be The Change opened the City's first youth drop-in center and this year expanded services and provides some overnight shelter at a facility on S 55th & Shartel. Discussions for potential CDBG funding to support new Oklahoma City youth shelters are on-going. In 2018, the CoC increased local funding and service coordination efforts with two (2) addition youth service organizations to initiate the opening of drop in centers and/or shelters for homeless youth.

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

In collaboration with City Planning Department staff and the Homeless Alliance, the Coalition organizes and implements the annual Point in Time Count (PIT) of the Homeless population each January. This information is used in the annual HUD Continuum of Care (CoC) competition. The data obtained from the annual count is used to determine need and identify present trends within the homeless population, including the chronically homeless and families with children.

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

The Continuum of Care Committee (CoC) oversees and evaluates the housing and service programs funded through the CoC, HOPWA, ESG, and City Social Services. The CoC Committee reviews project proposals and makes funding recommendations directly to the City Council.

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

Homeless Management Information System (HMIS) policies and procedures are developed through the Data Committee of the Coalition to End Poverty. Membership of the data committee is comprised of representatives from the CoC lead agency; the HMIS lead agency, and several CoC and ESG Subrecipient organizations. Policies and procedures are developed to comply with HUD data requirements as well as other federal and local requirements and must meet the data needs of the CoC. HMIS funding is provided by the City of Oklahoma City, through a Continuum of Care program grant, and from several other funding sources. In 2016 the CoC switched from a self-developed HMIS system to Servicepoint which allowed a cost savings of \$77,000 which was used to create a new permanent supportive housing

project for chronically homeless individuals. An additional HMIS grant of \$22,000 was subsequently required to offset higher than anticipated Servicepoint costs.

The Oklahoma City Emergency Medical Services Authority (EMSA) contracted with a consultant (Center for Urban Community Services) in 2007 to conduct an area-wide HOPWA Needs Assessment. The Assessment was completed in 2008 and provides the CoC a basis for HOPWA funding decisions. Although dated, this study remains relevant in 2019 and has been instrumental in supporting a comprehensive strategy that directs funding to those individuals and families with the greatest need. The Continuum of Care lead agency is currently exploring opportunities to determine priorities, gauge progress and develop strategies for addressing the underserved needs of persons and families with HIV/AIDS.

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

(Table 2 below)

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Metropolitan Fair Housing Council
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Administration-Fair Housing Enforcement
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City contracts with Metropolitan Fair Housing Council to conduct fair housing activities and investigate housing discrimination complaints. The Metro Fair Housing Council provides periodic reporting on their activities, which is used to tailor strategies for promoting Fair Housing. Metro Fair Housing's Fair Housing complaints data and organizational input were essential to the completion of the 2014 Analysis of Impediments.
2	Agency/Group/Organization	OKLAHOMA CITY HOUSING AUTHORITY
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs Homelessness Needs - Veterans Non-Homeless Special Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	In preparation of the 2015-20 Consolidated Plan, the Oklahoma City Housing Authority was consulted directly by City Staff to gauge current needs for public housing and Section 8 tenants. Information was provided by OCHA about current inventories, waiting lists, capital needs, and veteran’s benefits, anticipated funding over the next five (5) years, and anticipated gaps in resources. The City of Oklahoma City continues to provide CDBG funding to support the rehabilitation of eight (8) public housing units in the Fifth Action Plan Year to enhance the quality of public housing.
3	Agency/Group/Organization	Association of Central Oklahoma Governments
	Agency/Group/Organization Type	Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Market Analysis Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Oklahoma City continues to partner with the Association of Central Oklahoma Governments (ACOG) in support of economic development activities identified in the regional Comprehensive Economic Development Strategy (CEDS). ACOG serves as the regional Metropolitan Planning Organization (MPO). ACOG reviewed the proposed priority needs for the 2015-20 Consolidated Plan and the First Year Action Plan funding allocations. They remain supportive of the City's recommendations in this Fifth Action Year Plan.
4	Agency/Group/Organization	COMMUNITY ACTION AGENCIES OF OKLAHOMA AND CANADIAN COUNTIES
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Education
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development

<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The Community Action Agency (CAA) was consulted for the homeless needs assessment and identification of social services gaps during the Consolidated Plan planning process. CAA continued to provide child development services, treatment for substance abuse, and economic development loans for small businesses, homebuyer assistance, and emergency repair/weatherization activities for homeowners in the Fourth Action Plan Year. CAA was provided with CDBG funding to support emergency home repairs, graffiti removal, and small business services. Accomplishments are regularly reported to the City.</p>
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Table 3 – Agencies, groups, organizations who participated

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

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

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

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

Table 4 – Other local / regional / federal planning efforts

Narrative (optional)

The City of Oklahoma City maintains an ongoing dialogue with local non-profit and for-profit housing providers and developers to gauge housing needs in the metropolitan area. Solicitations for development proposals are drafted based upon current housing needs and community goals such as mixed income housing, deconcentration of poverty, infill development, and minimal design standards. Housing needs for very low-income families are identified through continuing discourse with the Oklahoma City Housing Authority. In this Fifth Action Year Plan, The City of Oklahoma City consulted the most recent release of the Oklahoma County Housing Needs Assessment prepared by Integra Realty Resources for the Oklahoma Housing Finance Agency in January 2016 and last revised in July 2016. This report provides helpful data, trends, and statistics for the local housing market such as demographics, market supply and demand, vacancies, average rental rates, housing costs, economic conditions and needs of the homeless. Current data and market trends in multifamily and commercial development are monitored through analysis of the Price Edwards & Company, Oklahoma City market studies which are released annually. An RFP was published in Spring 2019 soliciting proposals for a new housing market study, affordable housing study and analysis of impediments to support work on the 2020-2025 Five Year Consolidated Plan. A Contractor has been selected and contract development is underway; work is expected to be completed over the next 18 months.

Two (2) public meetings were held in January 2019 at the Sunbeam Family Services facility at NW 14th and Classen. Attendance at these meetings by local service providers and neighborhood associations included representatives from Community Action Agency, Upward Transitions, Neighborhood Services Organization, Mental Health Association of Oklahoma, HOPE Community Center, Heartline 2-1-1, Central Oklahoma Transportation and Parking Authority, Jefferson Park Neighborhood Association, Positively Paseo, Neighborhood Housing Services, City Care, Oklahoma City Metro Alliance, and private citizens. Comments and input received during these public meetings are provided in Appendix 2.

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

Collaborative efforts to promote economic growth are sometimes more difficult to achieve due to the competition for sales tax dollars between local communities. The funding of city services relies heavily on continued increases in sales tax receipts and the City of Oklahoma City often finds itself in direct competition with suburban municipalities for new businesses. In the first three (3) Action Plan Years, a significant decrease in municipal sales tax revenue only served to exacerbate the problem; however, in

the last 24 months, sales tax collection has shown a marked improvement primarily due to changes in state law regarding collection of sales tax for online purchases.

AP-12 Participation – 91.105, 91.200(c)

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

A Notice of Public Meetings was published in *The Oklahoman* on December 19, 2018 soliciting participation and feedback for the 2019-20 Fifth Action Year Plan. In addition, local stakeholders, non-profit organizations and other interested parties were notified of the public meetings via email on January 8, 2019. Meetings were held at the Sunbeam Family Services facilities at NW 14th and Classen at 6:00 p.m. on January 22, 2019 and at 3:00 p.m. on January 24, 2019. Additional opportunities for public comment were provided at preliminary and final budget presentations to the Citizens Committee for Community Development held at 4:00 p.m. on March 12, 2019 and at 4:00 p.m. on May 8, 2019. A final public hearing was held at the regular City Council meeting at 8:30 a.m. on June 4, 2019.

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

Citizen Participation Outreach

Table 5 – Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meetings	Non-targeted/broad community Non-Profit Organizations and Service Providers	Two (2) public meetings were held for public comment and feedback. The session on January 24, 2019 was scheduled at 3:00 p.m. to accommodate citizens working evening hours, and to provide an alternative time for	A summary of community feedback is attached in the appendices of this report (Appendix 2).	All comments and suggestions were given due consideration in the allocation process, although not all requests could be supported.	

			<p>representatives from local non-profits and service providers during normal business hours.</p> <p>Twenty-seven (27) community members attended the two sessions. Six (6) City Community Development Staff members were present at each meeting.</p>			
2	Newspaper Ad	Non-targeted/broad community	<p>A Combined Notice of Thirty (30) Day Comment Period and Notice of Public Hearing was submitted to Oklahoma Publishing Company (OPUBCO) for publication on April 25, 2019 and printed on May 3, 2019 in the legal notices.</p>	<p>No additional comments were received in response to the published request for public comment about proposed activities.</p>	Not Applicable	
3	Public Meeting	Non-targeted/broad community	<p>In addition to the two (2) public meetings conducted for citizen input, the proposed Fifth Action Year Plan was also presented at public meetings of the Citizens Committee for Community Development on March 2 and May 8, 2019. The Plan as approved by the CCCD was presented during a final public hearing at City Council on June 4, 2019.</p>	<p>No additional feedback from the public was received during the public hearings.</p>	Not Applicable	

Expected Resources

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

Introduction

Final allocations of funding from the U.S. Department of Housing and Urban Development (HUD) were announced on April 15, 2019 and communicated via email by HUD on April 18, 2019. The CDBG allocation of \$4,869,051 represents a 0.66% decrease from FY 2018. The HOME program received a fairly significant decrease of \$267,945 below last year's funding, which will adversely affect the City's ability to fund new affordable housing projects. ESG funding received a modest increase of \$21,344

(5.41%). HOPWA assistance for persons with HIV/AIDS increased by \$91,138 (12.97%).

Anticipated Resources (Table 5)

	Source of Funds	Uses of Funds	Expected Amount Available Year 5				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Federal	Acquisition, Admin and Planning, Economic Development, Housing, Public Improvements, Public Services	\$4,869,051	\$1,592,675	\$4,023,497	\$10,485,223	\$0	Prior year resources include 2018 unprogrammed /re-programmed funds, funds carried forward from prior year activities not yet completed, and funds recaptured from completed projects with unspent balances. No additional funds are anticipated for allocation during this Fifth and final Action Plan Year.
HOME	Federal	Acquisition, Homebuyer assistance, Homeowner rehab, Multifamily rental new construction, Multifamily rental rehab, New construction for ownership, TBRA	\$2,214,939	\$80,000	\$3,910,702	\$6,205,641	\$0	Prior year resources include 2018 unprogrammed /re-programmed funds, funds carried forward from prior year activities not yet completed, and funds recaptured from completed projects with unspent balances. No additional funds are anticipated for allocation during this Fifth and final Action Plan Year.
HOPWA	Federal	Permanent housing in facilities, Permanent housing placement, Short term or transitional housing facilities, STRMU, Supportive services, TBRA	\$793,749	\$0	\$0	\$793,749	\$0	No additional funds are anticipated for allocation during this Fifth and final Action Plan Year.
ESG	Federal	Conversion and rehab for transitional housing, Financial Assistance, Overnight shelter, Rapid re-housing (rental assistance), Rental Assistance Services, Transitional housing	\$415,903	\$0	\$0	\$415,903	\$0	No additional funds are anticipated for allocation during this Fifth and final Action Plan Year.

Table 5 - Expected Resources – Priority Table

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

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

The City has a CHDO set-aside that includes the 15% CHDO statutory minimum and a pool of HOME funds loaned to Community Housing Development Organizations for new home construction and rehabilitation/sale activities. CHDOs are encouraged to utilize private bank financing along with the CHDO loan pool of HOME funds in providing affordable housing. Proposals for new projects are generally accepted when the CHDO has completed all previously funded projects. When available, The City facilitates the transfer at no cost, of Oklahoma County owned vacant lots to nonprofit organizations for the construction of affordable housing. The lots are provided to the City through an agreement with Oklahoma County, and the primary lot recipients are CHDOs. The new home construction is funded with CHDO proceeds. Homebuyers obtain private financing through local lenders and other resources. When resources allow, the City also provides local funding (general funds) to agencies that provide services to the homeless.

Federal funds provided by HUD are utilized in several ways to leverage public and private resources. The City's down payment and closing cost assistance program (DPA) assists income-qualified buyers in achieving home ownership. During the 2017-2018 CAPER reporting period, the City leveraged its Down Payment Assistance program funds with private financial institution mortgage investments totaling \$3,786,065. Similar leverage can be anticipated annually in future program years. The City may also assist developers providing HOME funds for Low Income Housing Tax Credit (LIHTC) applications to the Oklahoma Housing Finance Agency (OHFA) when reasonable to do so, and may also assist the recipients of Housing Trust Fund (HTF) funding. OHFA in past years has sometimes provided bonus points for applications that receive a minimum level of funding granted to the project from the local community. LIHTC credits provide significant leverage in affordable housing developments.

The City of Oklahoma City currently has a HOME match credit of \$8,819,934. Matching funds are primarily earned through private market mortgages obtained by CHDOs and Down Payment Assistance Program recipients. CHDOs are encouraged to utilize private bank financing along with CHDO loan pool of HOME funds in providing affordable housing. New home construction is typically funded with private mortgage financing and other resources. Presidential Disaster Declarations and HUD match reduction for severe fiscal distress has eliminated the need to provide 25% match funding for the HOME program in several past program years which has contributed to a large match credit. This surplus match will be used to ensure compliance with the HUD mandated 25% leverage requirement in future program years.

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

The Oklahoma City Urban Renewal Authority (OCURA) still owns much property in the central and

northeast area of the city and strives to develop some of their sites with mixed-income housing projects. Beyond this, OCURA will continue the redevelopment of closeout areas under the agreements with HUD through eligible program activities that may include acquisition, disposition, relocation, clearance, environmental remediation, infrastructure improvements and/or urban renewal completion. HUD designated Urban Renewal areas include Medical Center R-20, Central Business District 1A R-30, and John F. Kennedy R-35. In addition, OCURA will redevelop locally designated low and moderate income urban renewal areas that include Harrison Walnut, the Cultural District, North Downtown, and the Northeast Renaissance area.

The City previously owned thirty-six (36) residential lots on the north side of Northwest 10th Street between Ellison Avenue to the east, and Blackwelder Avenue to the west. These lots were offered in a Request for Proposals (RFP) released on March 25, 2015 to solicit project proposals for residential, commercial and/or mixed-use development on these sites. The City completed negotiations with a local builder to develop a mixed income housing and retail on these lots, and the property has been conveyed. Ground was broken in January 2018. It was anticipated that first phase of redevelopment of these parcels would be completed within the Fourth Action Plan Year. A second phase was expected to begin upon lease up and occupancy of the first phase. At the time of this report, the developer has encountered significant delays and has not fulfilled the terms of the development agreement. It is expected that these lots may be reclaimed by the City and made available through a new RFP in the Fifth Action Plan Year. Additional City-owned lots between Blackwelder Avenue to the east and Virginia Avenue to the west may be offered in a similar RFP at a future date.

Discussion:

This is the Fifth and final Action Year Plan for the 2015-20 Five Year Consolidated Plan. Most funds are expected to be allocated and expended prior to June 30, 2020; therefore, no additional funding has been projected for "Expected Amount Available Remainder of Con Plan". Unanticipated receipt of program income, other revenue sources, and/or unexpected project delays during this final action plan year will be addressed in the 2020-25 First Year Action Plan.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Whole-House Rehabilitation-HOME	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Quality of Affordable Owner Housing	HOME: \$1,610,341	Rental units rehabilitated: 27 Household Housing Unit
2	Exterior Maintenance CDBG	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Quality of Affordable Owner Housing	CDBG: \$1,254,000	Homeowner Housing Rehabilitated: 45 Household Housing Unit
3	Emergency Repairs-CDBG	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Quality of Affordable Owner Housing	CDBG: \$665,847	Homeowner Housing Rehabilitated:90 Household Housing Unit
4	Downpayment and Closing Costs Assistance-HOME	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Affordability of Owner-Occupied Housing	HOME: \$635,699	Homeowner Housing Added: 33 Household Housing Unit
5	CHDO New Construction/Rehab-HOME	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA	Supply of Affordable Owner-Occupied Housing	HOME: \$1,941,364	Homeowner Housing Added: 8 Household Housing Unit
6	Multi-Family Rehab-CDBG	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA	Supply of Affordable Rental Housing	CDBG: \$0	Rental units rehabilitated: 0 Household Housing Unit
7	Rehabilitation of Public Housing Units-CDBG	2015	2020	Public Housing		Quality of Public Housing	CDBG: \$234,897	Rental units rehabilitated: 8 Household Housing Unit
8	Affordable Housing Development- CDBG and HOME	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA	Supply of Affordable Owner-Occupied Housing	CDBG: \$0 HOME: \$1,339,816	Homeowner Housing Added: 23 Household Housing Unit
9	Public Facilities, Srvcs, Infrastructure-SNI CDBG	2015	2020	Non-Housing Community Development	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Quality of Affordable Owner Housing Public Facilities, Services and Infrastructure	CDBG: \$1,734,032	Public service activities other than Low/Moderate Income Housing Benefit: 3000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
10	Special Needs Transportation Services-CDBG	2015	2020	Non-Housing Community Development		Transportation Options - Special Needs Population	CDBG: \$102,842	Public service activities other than Low/Moderate Income Housing Benefit: 15,350 Persons Assisted
11	Graffiti Removal-CDBG	2015	2020	Non-Housing Community Development		Public Services- Graffiti Removal	CDBG: \$15,011	Public service activities other than Low/Moderate Income Housing Benefit: 450 Persons Assisted
12	Secure Vacant and Abandoned Properties- CDBG	2015	2020	Non-Housing Community Development		Address Slum and Blight- Vacant Abandoned Buildings	CDBG: \$68,562	Public Service Activities other than Low/Moderate Income Housing Benefit: 100 Households Assisted
13	Small Business Technical Assistance-CDBG	2015	2020	Non-Housing Community Development		Economic Opportunities for Low and Moderate Income	CDBG: \$39,149	Businesses assisted: 125 Businesses Assisted
14	Section 108 Loan Assistance- CDBG	2015	2020	Non-Housing Community Development		Economic Opportunities for Low and Moderate Income	CDBG: \$350,000	Jobs created/retained: 0 Jobs
15	Empowerment Zone Staffing- CDBG	2015	2020	Non-Housing Community Development		Economic Opportunities for Low and Moderate Income	CDBG: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted
16	Aid Blighted, Vacant, Underutilized Property-CDBG	2015	2020	Non-Housing Community Development		Acquisition/Clearance of Vacant, Blighted Property	CDBG: \$1,106,780	Other: 1 Other
17	Community Development Public Facilities Program	2015	2017	Non-Housing Community Development		Public Facilities, Services and Infrastructure Sustainability Service Provider Facilities-CDBG	CDBG: \$2,039,189	Public facilities or infrastructure activities other than Low/Moderate Income Housing Benefit: TBD Persons Assisted Other: TBD Other
18	STRMU for Persons with HIV/AIDS- HOPWA	2015	2020	Non-Homeless Special Needs		Housing Availability- Persons With HIV/AIDS	HOPWA: \$396,874	Housing for People with HIV/AIDS added: 115 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
19	TBRA for Persons with HIV/AIDS-HOPWA	2015	2020	Non-Homeless Special Needs		Housing Availability-Persons With HIV/AIDS	HOPWA: \$396,874	Housing for People with HIV/AIDS added: 50 Household Housing Unit
20	Housing for the Chronically Homeless- ESG	2015	2020	Homeless		Supportive Housing for the Chronically Homeless	ESG: \$415,903	Hsg. and case mgmt. 150; legal services 100; Outreach 1000; health care 1500 Prevention-hhld w/children 120
21	Administration	2015	2020	Administration		Administration	CDBG: \$1,161,200 HOME: \$381,493	Other: 0 Other
22	OCHA Property Inspection program	2018	2020	Affordable Housing		Quality of Public Housing	CDBG: \$90,000	Other: 0 Other
23	Public Services-Homeless	2017	2020	Non-Housing Community Development		Public Services-Homeless	CDBG: \$60,000	Benefit: 450 persons assisted

Table 6 – Goals Summary

Goal Descriptions.

1	Goal Name	Whole-House Rehabilitation-HOME
	Goal Description	Provide HOME financial assistance for the whole-house rehabilitation of a minimum of twenty-seven (27) owner-occupied housing units for income qualified families, seven (7) of which will be in the SNI strategy area. HOME funding \$1,110,341.85 allocated to OKC Whole House Rehab Program, with a goal to target 40% of funding in SNI neighborhoods. \$500,000 allocated in prior years will be carried forward. Total funding for these activities is \$1,610,341.85.
2	Goal Name	Exterior Maintenance -CDBG
	Goal Description	Provide CDBG funding in the amount of \$1,184,000 for the remediation of exterior maintenance code violations on a minimum of forty-five (45) owner-occupied housing units for income qualified families. Of this amount, \$534,000 is available for program delivery. In addition, \$55,000 is carried forward for program activities and \$15,000 is carried forward for program delivery. Total funding for the new program year is \$1,254,000.
3	Goal Name	Emergency Repairs-CDBG
	Goal Description	Provide CDBG funding in the amount of \$597,847.50 for emergency repairs provided to a minimum of ninety (90) owner-occupied housing units for income qualified families to address immediate threats to life, health and safety. In addition, \$75,000 will be carried forward for total funding of \$665,847.50.
4	Goal Name	Downpayment and Closing Costs Assistance-HOME
	Goal Description	Provide HOME funding in the amount of \$400,000 for down payment and closing costs assistance for a minimum of thirty-three (33) households, with an 80% spending goal within the DPA Program targeted area when practicable (see Appendix 5). In addition, funds from FY 2018-19 in the amount of \$235,699.59 will be carried forward for a total allocation of \$635,699.59.
5	Goal Name	CHDO New Construction/Rehab- HOME
	Goal Description	Provide new HOME funding in the amount of \$332,240.85 for new construction or rehabilitation of at least eight (8) housing units for income qualified families through Community Housing Development Organizations (CHDOs). In addition, funding is carried forward from prior year allocations from set-aside and loan pool balances awarded in prior program years 2015 thru 2018 (totaling \$1,609,124.04. Total CHDO funding is \$1,941,364.89.
6	Goal Name	Multi-Family Rehab- CDBG
	Goal Description	No new multifamily rehab activities are anticipated to be funded in FY 2019-20.

7	Goal Name	Rehabilitation of Public Housing Units- CDBG
	Goal Description	Provide CDBG funding in the amount of \$234,897 to the Oklahoma City Housing Authority for the rehabilitation of a minimum of eight (8) public housing units.
8	Goal Name	Affordable Housing Development- CDBG and HOME
	Goal Description	Provided HOME funding in the amount of \$100,000 for future project(s) to increase the supply of affordable housing. In addition, \$350,000 has been reprogrammed to this activity from prior year resources. \$342,720.28 will be carried forward to support three (3) units in the former Mitchford Development which was significantly delayed and subsequently transferred to OCURA. \$300,000 was provided in prior years to support the First Step Men's SRO facility, of which \$229,732.28 has been carried forward; twenty (20) SRO units will be completed during the Fifth Action Plan Year. \$317,363.81 in prior year funding remains unallocated and has been carried forward. Total HOME funding for the Affordable Housing Program in the Fifth Action Plan Year is \$1,339,816.37. A new CDBG Activity is established in the Fifth Action Plan Year to facilitate acquisition and utilities for the Walnut Development Project by non-profit developers using \$350,000 in reprogrammed funds.
9	Goal Name	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Goal Description	Provide CDBG Funding in the amount of \$757,378.91 to assist in public services and public facilities activities in the SNI neighborhoods, to include tree planting, hazardous tree removal, sidewalks, park improvements, public education, and after school programming. Households assisted include area benefit activities. In addition, \$976,653.65 has been carried forward from prior programs years. Total SNI funding for 2019-20 is \$1,734,032.56.
10	Goal Name	Special Needs Transportation Services-CDBG
	Goal Description	Expand transportation options using \$102,842.00 in CDBG funds for homeless individuals and persons with special needs to improve accessibility, and to improve quality of life. An estimated 15,350 subsidized taxi fares and bus coupons will be provided to approximately 3,100 homeless persons, seniors, and people with disabilities.
11	Goal Name	Graffiti Removal-CDBG
	Goal Description	Provide CDBG funding in the amount of \$15,011.00 to eliminate graffiti at an estimated four hundred fifty (450) locations in low and moderate income neighborhoods.

12	Goal Name	Secure Vacant and Abandoned Properties- CDBG
	Goal Description	Provide CDBG funding in the amount of \$68,562.00 for interim assistance to secure a minimum of 100 vacant and abandoned properties to address slum and blight on a spot basis.
13	Goal Name	Small Business Technical Assistance- CDBG
	Goal Description	Provide CDBG funding in the amount of \$39,149.00 to support Technical Assistance (TA) for a minimum of one hundred twenty-five (125) small businesses.
14	Goal Name	Section 108 Loan Assistance- CDBG
	Goal Description	Apply for Section 108 loan program funds to provide Special Economic Assistance for the creation of jobs. The \$350,000.00 "funding" allocation noted below is the annual debt service on outstanding loans and not direct assistance to a specific project. These funds would only be expended in the event of a loan default. It is not anticipated that jobs will be created during the Fifth Action Plan Year.
15	Goal Name	Empowerment Zone Staffing- CDBG
	Goal Description	The City will promote and continue to provide staff for the ongoing implementation of the Empowerment Zone (EZ) designation, if the program is extended or re-established beyond the December 31, 2017 expiration. No funding has been allocated to this activity.
16	Goal Name	Aid Blighted, Vacant, Underutilized Property-CDBG
	Goal Description	CDBG Funding in the amount of \$788,880 plus authorized program income carry-over in the amount of \$317,900 to OCURA as a Subrecipient to support CDBG eligible activities that principally include but are not limited to real property acquisition, clearance and demolition, cleanup of contaminated sites, public facilities and improvements, and housing for the benefit of low to moderate individuals or low-mod income areas. Total Fifth Year Action Plan Funding is \$1,106,780.
17	Goal Name	Community Development Public Facilities Program
	Goal Description	Support for the Community Development Program to assist non-profit service providers with infrastructure and/or rehabilitation of facilities. \$999,326.61 in uncommitted funds has been carried forward from the prior Action Plan years. A new allocation of \$3,673.39 is approved for the Fifth Action Plan Year to increase the amount available for new projects under an open RFP. In addition, \$721,324.93 has been reprogrammed to this activity for new TBD projects. \$186,252.89 has been carried forward for a Kiwanas Head Start facility that is underway and \$128,611.29 has been carried forward for the Metro Alliance SRO project which is expected to be completed during the Fifth Action Plan Year. Total activity funding for this line item in FY 2019-20 is \$2,039,189.11.

18	Goal Name	STRMU for Persons with HIV/AIDS- HOPWA
	Goal Description	Provide Short Term Rent Mortgage and Utility (STRMU) assistance using HOPWA funding in the amount of \$396,874.50 to an estimated one hundred fifteen (115) persons with HIV/AIDS.
19	Goal Name	TBRA for Persons with HIV/AIDS- HOPWA
	Goal Description	Provide Short Term Tenant Based Rental Assistance (TBRA) using HOPWA funding in the amount of \$396,874.50 to an estimated fifty (50) persons with HIV/AIDS.
20	Goal Name	Housing for the Chronically Homeless- ESG
	Goal Description	ESG funds in the amount of \$415,903 will be used to provide housing and case management resources for approximately 150 chronically homeless, families and veterans. Legal services will be provided to approximately one hundred (100) individuals and families to reduce evictions. Shelter and outreach services will be provided to approximately 1000 homeless youth and seniors, victims of domestic violence, and individuals with mental illness. Approximately 120 homeless households with children will receive rapid re-housing and prevention services. An estimated 1,500 low income and homeless individuals will access health care services.
21	Goal Name	Administration
	Goal Description	Provide administrative and management support for CDBG in the amount of \$1,161,200.20 and HOME programs in the amount of \$381,493.90. CDBG includes new administrative support funding of \$831,065.20 plus Planning support \$60,000, and Fair Housing Complaint processing \$82,745.00. (\$187,390 of 'carryover' from 18-19 admin funds will be unspent but committed prior to July 1, 2019 to fund a contract with a consultant for housing studies.), Home includes \$221,493.90 in new administrative funding support and \$160,000 carried forward.
22	Goal Name	OCHA Property Inspection Program
	Goal Description	Provide CDBG funding in the amount of \$90,000 to fund Community Development housing rehab staff to inspect Oklahoma City Housing Authority units. Funding includes carry forward balance of \$40,000 and new allocation of \$50,000.
23	Goal Name	Public Services- Homeless
	Goal Description	\$60,000 in CDBG funding to provide healthcare for the homeless (Healing Hands). This activity was previously shown under the Community Development Public Facilities Program.

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

It is estimated that **520** households will be assisted in obtaining or retaining affordable housing. This includes the following:

- **27** whole house rehabs
- **8** public housing unit rehabs
- **20** SRO units completed
- **1** Acquisition Rehabs (HOP)
- **45** exterior maintenance repairs
- **90** emergency home repairs
- **33** recipients of down payment assistance
- **8** CHDO homes
- **3** single family homes for sale to low-income households
- **115** STRMU recipients
- **50** TBRA recipients
- **120** recipients of rapid re-housing services

Projects

AP-35 Projects – 91.220(d)

Introduction

The following initiatives and goals for the Fifth Action Year Plan are consistent with those established in the Five-Year Consolidated Plan with an effective date of July 1, 2019, and are compatible with the purposes set forth in **24 CFR Section 91.1**, that include:

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

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

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

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

Oklahoma City's formula grant funding allocations, recommended for adoption the Fifth Action Year Plan (fiscal year July 1, 2019 through June 30, 2020), follow the priorities established in the five-year Consolidated Plan that expires June 30, 2020. The Fifth Annual Action Year Plan strategy contains specific funding recommendations to implement the goals established in the five-year Plan tables to the greatest extent possible, depending on federal funding allocations awarded to Oklahoma City.

The funding recommendations for the 2019-2020 Fifth Action Year Plan were considered by the Citizen's

Committee for Community Development on May 8, 2019 and received their favorable recommendation. Final Plan approval was granted by the City Council on June 4, 2019.

Projects

#	Project Name
1	Down Payment Assistance Program
2	OKC Housing Assistance Program-Whole House Rehab
3	Affordable Housing Development Program
4	CHDO Set-Aside Activities: Loan Pool and New Construction
5	Oklahoma City Housing Authority-Modernization
6	CAA Emergency Home Repair Program
7	OCURA Low-Mod Benefit Program
8	Housing Exterior Maintenance Program
9	Strong Neighborhoods Initiative
10	Public Services- SNI Hazardous Tree Removal
11	Public Services- SNI After School Programs
12	Public Facilities- SNI Neighborhood-led Projects
13	Public Facilities- SNI Tree Planting
14	Public Facilities- SNI Park Improvements
15	Public Services- COTPA (Embark) Share-a-Fare Program
16	Public Services-CAA Graffiti Removal
17	Public Services-OKC Abandoned Housing
18	Public Services-Homeless
19	Community Development Public Facilities Program
20	CAA Small Business Loan Program
21	HUD Section 108 Loan Program
22	OCURA Close Out, Slum Blight, Acquisition, Remediation
23	Empowerment Zone Staff Support
24	Administration-Metro Fair Housing Council
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27	ESG Activities
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29	OCHA Property Inspections-Housing Services
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Table 7 - Project Information

AP-38 Project Summary

Project Summary Information

1	Project Name	Down Payment Assistance Program
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Downpayment and Closing Costs Assistance-HOME
	Needs Addressed	Affordability of Owner-Occupied Housing
	Funding	HOME: \$665,847.50
	Description	Provide HOME funds for down payment and closing costs assistance up to \$15,000 for low and moderate-income homebuyers with 80% spending goal within the SNI neighborhoods and the NRSA when practicable. If unable to timely meet this goal, DPA funding may be spent in non-targeted areas. Funding above includes \$235,699.59 funding from prior years and \$400,000.00 in 2019-20 funding.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	An estimated twenty-three (23) households will be provided down payment and closing costs assistance for homes within targeted neighborhoods and ten (10) homes will be assisted in non-targeted neighborhoods.
	Location Description	Funding is restricted to the Program boundaries with priority given to SNI and NRSA neighborhoods.
	Planned Activities	Down Payment and closing costs assistance to low and moderate-income homebuyers.
2	Project Name	OKC Housing Assistance Program-Whole House Rehab
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Whole-House Rehabilitation-HOME
	Needs Addressed	Quality of Affordable Owner Housing
	Funding	HOME: \$1,610,341.85

	Description	Provide HOME financial assistance for the whole-house rehabilitation of owner-occupied housing units. 40% of funds will be targeted to SNI neighborhoods. Funding includes \$500,000 carry forward from the OKC Housing Assistance Program prior years allocation, and \$1,110,341.85 in 2019-20 funding.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	An estimated twenty (20) low income homeowners will be assisted with whole house rehabilitation, plus seven (7) additional homes within the SNI neighborhoods
	Location Description	City-wide, with priority placed on properties within the SNI and NRSA neighborhoods.
	Planned Activities	Whole House Rehabilitations
3	Project Name	Affordable Housing Development Program
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Affordable Housing-AHDP and RHP- CDBG and HOME
	Needs Addressed	Supply of Affordable Housing - AHDP and RHP
	Funding	HOME: \$1,339,816.37 CDBG: \$350,000

	Description	HOME funding in the amount of \$100,000 for future project(s) to increase the supply of affordable housing. In addition, \$350,000 has been reprogrammed to this activity from prior year resources. \$342,720.28 will be carried forward to support three (3) units in the former Mitchford Development which was significantly delayed and subsequently transferred to OCURA. \$300,000 was provided in prior years to support the First Step Men’s SRO facility, of which \$229,732.28 has been carried forward; twenty (20) SRO units will be completed during the Fifth Action Plan Year. \$317,363.81 in prior year funding remains unallocated and has been carried forward. Total HOME funding for the Affordable Housing Program in the Fifth Action Plan Year is \$1,339,816.37. A new CDBG Activity is established in the Fifth Action Plan Year to facilitate acquisition and utilities for the Walnut Development Project by non-profit developers using \$350,000 in reprogrammed funds.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Three (3) low income households in the OCURA housing development are expected to achieve homeownership in the SNI target area during the Fifth Action Plan Year. Twenty (20) SRO units are expected to be completed in the First Step project.
	Location Description	The OCURA properties are in the Culbertson's East Highland SNI neighborhood.
	Planned Activities	New construction of for-sale housing and SRO units
4	Project Name	CHDO Set-Aside Activities: Loan Pool and New Construction
	Target Area	City-wide
	Goals Supported	CHDO New Construction/Rehab- HOME
	Needs Addressed	Supply of Affordable Owner-Occupied Housing
	Funding	HOME: \$1,941,364.89

	Description	Provide new HOME funding in the amount of \$332,240.85 for new construction or rehabilitation of at least eight (8) housing units for income qualified families through Community Housing Development Organizations (CHDOs). In addition, funding is carried forward from prior year allocations from set-aside and loan pool balances awarded in prior program years 2015 thru 2018 totaling \$1,609,124.04. Total CHDO funding is \$1,941,364.89.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	An estimated eight (8) low income households will achieve homeownership.
	Location Description	Approximately eight (8) housing units will be constructed or rehabilitated with CHDO set-aside funds during the Fifth Action Year Plan. Actual estimates of production cannot be provided until all funds have been allocated. Eight (8) units of homeowner housing for low and moderate-income families is estimated based on historical fund activity. Locations TBD.
	Planned Activities	New housing construction and/or rehabilitation
5	Project Name	Oklahoma City Housing Authority-Modernization
	Target Area	City-wide
	Goals Supported	Rehabilitation of Public Housing Units- CDBG
	Needs Addressed	Quality of Public Housing
	Funding	CDBG: \$234,897
	Description	Provide CDBG funding in the amount of \$234,897 to the Oklahoma City Housing Authority for the rehabilitation of a minimum of eight (8) public housing units.
	Target Date	6/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	An estimated eight (8) extremely low-income households will access or maintain a rehabilitated public housing unit.
	Location Description	Funding restricted to OCHA operated public housing units.
	Planned Activities	Rehabilitation
6	Project Name	CAA Emergency Home Repair Program
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Emergency Repairs-CDBG
	Needs Addressed	Quality of Affordable Owner Housing
	Funding	CDBG: \$665,847.50
	Description	Provide CDBG funding in the amount of \$597,847.50 for emergency repairs provided to a minimum of ninety (90) owner-occupied housing units for income qualified families to address immediate threats to life, health and safety. In addition, \$75,000 will be carried forward for total funding of \$665,847.50.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	An estimated ninety (90) low to moderate income households will receive emergency home repairs.
	Location Description	City-wide, with priority given to properties located within the SNI neighborhoods and the NRSA.
	Planned Activities	Emergency home repairs.
7	Project Name	OCURA Low Mod Benefit Program
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Aid Blighted, Vacant, Underutilized Property-CDBG

	Needs Addressed	Acquisition/Clearance of Vacant, Blighted Property
	Funding	CDBG: \$317,900
	Description	Authorized carry-over funding and program income of \$317,900 to OCURA as a subrecipient to support CDBG eligible activities that principally include but are not limited to real property acquisition, clearance and demolition, cleanup of contaminated sites, public facilities and improvements, and housing for the benefit of low to moderate individuals or low-mod income areas. Funding above has been carried forward from prior year. \$40,940.11 remaining from the Sunbeam project was recaptured and reprogrammed.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Beneficiaries will be reported under individual project activities.
	Location Description	Locations not yet determined.
	Planned Activities	City-wide, with priority to project developments within the NRSA neighborhoods and Urban Renewal Areas.
8	Project Name	Housing Exterior Maintenance Program
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Exterior Maintenance and Storm Shelters-CDBG
	Needs Addressed	Quality of Affordable Owner Housing
	Funding	CDBG: \$1,254,000

	Description	Provide CDBG funding in the amount of \$1,184,000 for the remediation of exterior maintenance code violations on a minimum of forty-five (45) owner-occupied housing units for income qualified families. Of this amount, \$534,000 is available for program delivery. In addition, \$55,000 is carried forward for program activities and \$15,000 is carried forward for program delivery. Total funding for the new program year is \$1,254,000.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	An estimated forty-five (45) low income owner-occupied households will be assisted with exterior maintenance. Funding will be prioritized in the SNI and NRSA neighborhoods but remains available for use city wide.
	Location Description	City-wide with emphasis on NRSA and SNI neighborhoods.
	Planned Activities	Home Exterior Maintenance
9	Project Name	Strong Neighborhoods Initiative
	Target Area	Strong Neighborhoods Initiative neighborhoods
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, services, and infrastructure
	Funding	\$1,734,032.56
	Description	Provide CDBG Funding in the amount of \$757,378.91 to assist in public services and public facilities activities in the SNI neighborhoods, to include tree planting, hazardous tree removal, sidewalks, public education, neighborhood grants, after-school programming and to contribute to public facilities such as alleyways, parks or plazas. In addition, \$976,653.65 has been carried forward from prior programs years. Total SNI funding for 2019-20 is \$1,734,032.56.
	Target Date	6/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	Projected benefit includes area benefit activities. Public service beneficiaries are identified under the individual activity descriptions following.
	Location Description	Funding is restricted to the SNI neighborhoods.
	Planned Activities	Tree planting, hazardous tree removal, park improvements, sidewalks, public service activities, neighborhood capacity building, public infrastructure, and afterschool/summer educational programs.
10	Project Name	Public Services- SNI Hazardous Tree Removal
	Target Area	Strong Neighborhoods Initiative
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure
	Funding	CDBG: \$50,000
	Description	CDBG funds provided to trim and/or remove hazardous trees that pose a threat to personal and public safety in SNI neighborhoods. The project is funded under the SNI program which has an allocation of CDBG funds in the amount of \$1,734,032.56 in FY 2019-20.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Twenty (20) low to moderate income households will receive assistance in the removal of hazardous trees.
	Location Description	Funding is restricted to the SNI neighborhoods.
	Planned Activities	Public services-Hazardous tree removal
11	Project Name	Public Services- SNI After School Programs-STEAM
	Target Area	Strong Neighborhoods Initiative

	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure Strengthen Neighborhood Capacity
	Funding	CDBG: \$385,000
	Description	CDBG funding to support summer and after-school programming and tutoring for students in three (3) SNI neighborhoods (Capitol Hill, Capitol View, Culbertson’s East Highland). This activity is funded under the SNI program which has an allocation of CDBG funds in the amount of \$1,734,032.56 in FY 2019-20.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	An estimated five Hundred (500) students in SNI neighborhoods will be provided access to tutoring and after-school programming.
	Location Description	F.D. Moon Academy in Culbertson’s East Highland. Capitol Hill and Capitol View neighborhoods; exact locations TBD. Funds are restricted to the SNI neighborhoods
	Planned Activities	After-school programming
12	Project Name	Public Facilities- SNI Neighborhood-led Projects
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure Strengthen Neighborhood Capacity
	Funding	CDBG: \$95,000
	Description	CDBG funding to support SNI neighborhood-led public facilities improvement projects. This activity is funded under the SNI program which has an allocation of CDBG funds in the amount of \$1,734,032.56 in FY 2019-20.
	Target Date	6/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	Three (3) SNI neighborhoods will be assisted with neighborhood-led public facilities improvements.
	Location Description	Funds restricted to SNI neighborhoods
	Planned Activities	Public Facilities- Neighborhood improvements
13	Project Name	Public Facilities- SNI Tree Planting
	Target Area	Strong Neighborhoods Initiative
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure
	Funding	CDBG: \$25,000
	Description	CDBG funds provided to assist in tree planting efforts in SNI neighborhoods. This activity is funded under the SNI program which has an allocation of CDBG funds in the amount of \$1,734,032.56 in FY 2019-20.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Fifty (50) low to moderate income homeowners will have trees planted on their property in SNI neighborhoods
	Location Description	Funds are restricted to the SNI neighborhoods
	Planned Activities	Public Services-Tree Planting
14	Project Name	Public Facilities- SNI Park Improvements
	Target Area	Strong Neighborhoods Initiative
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure
	Funding	CDBG: \$400,000

	Description	CDBG funds to support park improvements and healthy recreational opportunities in areas that serve primarily low to moderate income households in the Capitol Hill and Capitol View neighborhoods. This activity is funded under the SNI program which has an allocation of CDBG funds in the amount of \$1,734,032.56 in FY 2019-20.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	One (1) or Two (2) SNI neighborhoods will be assisted with public facility improvements.
	Location Description	Funds are restricted to the SNI neighborhoods. Projects under consideration are in the Capitol View and Capitol Hill neighborhoods. A final determination has not been made.
	Planned Activities	Public Facilities- Park Improvements
15	Project Name	Public Services- COTPA (Embark) Share-a-Fare Program
	Target Area	City-wide
	Goals Supported	Special Needs Transportation Services-CDBG
	Needs Addressed	Transportation Options -Special Needs Population
	Funding	CDBG: \$102,842
	Description	CDBG funding is provided for an estimated 15,350 subsidized taxi fares and bus tokens for approximately 3,100 low and moderate income special needs populations, including the homeless, elderly persons over age 62, and persons with disabilities. The funding above is provided solely in 2019-20.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	15,350 discounted taxi fares and bus tokens will be provided to approximately 3,100 senior citizens and persons with special needs.
	Location Description	City-wide

	Planned Activities	Discounted taxi fare and bus coupons for low and moderate income special needs populations.
16	Project Name	Public Services-CAA Graffiti Removal
	Target Area	
	Goals Supported	Graffiti Removal-CDBG
	Needs Addressed	Public Services-Graffiti Removal
	Funding	CDBG: \$15,011
	Description	CDBG funding to support the elimination of graffiti for Four Hundred Fifty (450) locations as a crime prevention activity. The funding above is provided solely in 2019-20.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Graffiti will be removed at Four Hundred Fifty (450) locations within low and moderate-income neighborhoods. A greater community benefit exists as a crime prevention activity but cannot be quantitatively measured apart from the location of the properties served.
	Location Description	City-wide
	Planned Activities	Graffiti removal
17	Project Name	Public Services-OKC Abandoned Housing
	Target Area	City-wide
	Goals Supported	Secure Vacant and Abandoned Properties- CDBG
	Needs Addressed	Address Slum and Blight- Vacant Abandoned Bldgs
	Funding	CDBG: \$68,562
	Description	CDBG funding for interim assistance to secure a minimum of 100 vacant and abandoned properties to address slum and blight on a spot basis. The funding above is provided solely in 2019-20.
	Target Date	6/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	An estimated 100 vacant and abandoned homes will be secured in low and moderate-income neighborhoods to remove imminent threats to life, health and safety. A greater community benefit exists; however, it cannot be quantitatively measured apart from the properties secured.
	Location Description	City-wide
	Planned Activities	Secure vacant buildings
18	Project name	Healing Hands-Public Services to the Homeless
	Target Area	City-wide
	Goals Supported	Public Services-Homeless
	Needs Addressed	Healthcare for Homeless persons
	Funding	CDBG: \$60,000
	Description	\$60,000 in CDBG funding to support public services for the homeless (Healing Hands). This activity was funded under the Community Development Program in past years.
	Target Date	June 30, 2020
	Estimate the numbers and type of families that will benefit from the proposed activities	Approximately 450 homeless persons will be provided healthcare assistance.
	Location Description	City-wide
	Planned Activities	Public services for the homeless
19	Project Name	Community Dev Public Facilities Program-CDBG
	Target Area	City-wide
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG; Sustainability Social Service Provider Facilities
	Needs Addressed	Public Facilities, Services and Infrastructure Sustainability Service Provider Facilities-CDBG
	Funding	CDBG: \$2,039,189.11

	Description	Support for the Community Development Program to assist the City or non-profits with infrastructure and/or rehabilitation of public facilities. \$999,326.61 in uncommitted funds has been carried forward from the prior Action Plan years. A new allocation of \$3,673.39 is approved for the Fourth Action Plan Year to increase the amount available for new projects under an open RFP. In addition, \$721,324.93 has been reprogrammed to this activity for new TBD projects. \$186,252.89 is carried forward for a Kiwanas Head Start facility that is underway and \$128,611.29 is carried forward for the Metro Alliance SRO project expected to be completed during the Fifth Action Plan Year. Total activity funding for this line item in FY 2019-20 is \$2,039,189.11.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Twenty (20) SRO units are projected to be completed at the First Step men's lodge. Kiwanis Head Start facility is underway and expected to be completed in the upcoming program year with beneficiaries to be reported at that time. Future projects to be funded under the open RFP are not expected to be completed until future program years.
	Location Description	City-wide
	Planned Activities	Rehabilitation, public services and infrastructure
20	Project Name	CAA Small Business Services
	Target Area	City-wide
	Goals Supported	Small Business Technical Assistance- CDBG
	Needs Addressed	Economic Opportunities for Low and Moderate Income
	Funding	CDBG: \$39,149
	Description	CDBG funding provided for technical assistance to 125 small businesses. Funding will be provided solely in 2019-20.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 125 small businesses will be provided with technical assistance.

	Location Description	City-wide
	Planned Activities	Small business technical assistance
21	Project Name	HUD Section 108 Loan Repayment
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Section 108 Loan Assistance- CDBG
	Needs Addressed	Economic Opportunities for Low and Moderate Income
	Funding	CDBG: \$350,000
	Description	No jobs are expected to be created during the Fifth Action Plan Year as a result of new Section 108 loans. The City will consider projects for use of Section 108 as opportunities arise. The allocated funding is anticipated debt service on outstanding Section 108 loans which would be payable to HUD from CDBG entitlement funds if a financed project were to default. If all loans are repaid timely, no funds will be expended for this activity. Funds are carried over from prior years. No new funding is anticipated in 2019-20.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	It is anticipated that no jobs will be created in the Fifth Action Year Plan period. Funding will remain in contingency as insurance against a potential loan default and loss of CDBG entitlement funds.
	Location Description	Addresses of future projects are yet to be determined.
	Planned Activities	Job creation
22	Project Name	OCURA-Close Out, Slum Blight, Acquisition, Remediation
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Aid Blighted, Vacant, Underutilized Property- CDBG Affordable Housing-AHDP and RHP- CDBG and HOME
	Needs Addressed	Acquisition/Clearance of Vacant, Blighted Property
	Funding	CDBG: \$788,880

	Description	Funding for Oklahoma City Urban Renewal Authority (OCURA) for eligible activities that meet the National Objectives of Urban Renewal Completion or Slum/Blight Area Benefit. Activities principally include but are not limited to real property acquisition, clearance, disposition for housing or economic development in close-out and locally defined Urban Renewal Project Areas and urban renewal completion activities in close-out areas. A new allocation of \$788,880 will be provided in 2019-20. Prior year balance has been recaptured and reprogrammed.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	The number of program beneficiaries is contingent on the size and scale of projects funded.
	Location Description	Urban Renewal Project Areas
	Planned Activities	Acquisition, disposition, clearance, relocation and Urban Renewal completion
23	Project Name	Empowerment Zone Staff Support
	Target Area	Neighborhood Revitalization Strategy Area and Designated Empowerment Zone
	Goals Supported	Empowerment Zone Staffing- CDBG
	Needs Addressed	Economic Opportunities for Low and Moderate Income
	Funding	CDBG: \$1
	Description	The City will continue to provide staff support for continued implementation of the Empowerment Zone designation, if the program is extended or re-established with a future legislative action. No funding is allocated at the present time.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	The Empowerment Zone designation expired on December 31, 2017. It is not known if it will be re-established. No beneficiaries have been identified as the future of the program is uncertain.

	Location Description	Restricted to the EZ eligible boundaries
	Planned Activities	Administration-Staff Support
24	Project Name	Administration-Metro Fair Housing Council
	Target Area	City-wide
	Goals Supported	Administration
	Needs Addressed	Administration
	Funding	CDBG: \$82,745
	Description	Funding is provided to the Metro Fair Housing Council to undertake all Fair Housing activities on behalf of the City to include enforcement, education and compliance. The above funding will be provided solely in 2019-20.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Funding will support approximately 493 Housing Complaint Intakes, 13 Formal Housing Discrimination Complaints, 23 Fair Housing/Fair Lending Rights Seminars, 41 Requests for Reasonable Accommodation or Modification, and 69 Fair Housing Tests.
	Location Description	City-wide
	Planned Activities	Fair Housing activities
25	Project Name	Administration-Planning
	Target Area	City-wide
	Goals Supported	Administration
	Needs Addressed	Administration
	Funding	CDBG: \$60,000
	Description	Administration-Planning activities for various initiatives including but not limited to preparation of small area plans, the annual Action Plan, the Consolidated Annual Performance Evaluation Report (CAPER) and the five-year Consolidated Plan. The above funding will be provided solely in 2019-20.
	Target Date	6/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	Beneficiaries of Planning support will be reported under individual projects and activities.
	Location Description	City-wide
	Planned Activities	Administrative and Planning activities related to plan preparation
26	Project Name	Administration- CDBG and HOME
	Target Area	
	Goals Supported	Administration
	Needs Addressed	Administration
	Funding	CDBG: \$1,018,455.20/HOME: \$381,493
	Description	Administrative expenses for CDBG and HOME program operations and management. CDBG funding noted above includes reprogramming of \$187,390 (expected to be contractually committed by July 1, 2019, but unspent) and a new allocation of 2019-20 funds in the amount of \$931,065.20. The HOME Administration allocation of \$381,493 includes \$160,000 carried forward from 2018-19, and \$221,493.90 in new funding for 2019-20.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Beneficiaries will be reported under individual program activities.
	Location Description	City-wide
Planned Activities	Program Administration	
27	Project Name	ESG Activities
	Target Area	City-wide
	Goals Supported	Housing for the Chronically Homeless- ESG

Needs Addressed	Supportive Housing for the Chronically Homeless Services for Homeless Youth (Age 21 and under) Sustainability of Transitional Housing Increased Employment Rate for CoC Participants Homeless Households with Children Public Facilities, Services and Infrastructure
Funding	ESG: \$415,903
Description	ESG Funds will be used for the following Activities: 1) To provide housing and case management resources for up to one hundred fifty (150) chronically homeless individuals and veterans. 2) To provide support for the planning of future Drop-in facilities and/or shelters for homeless youth to be completed in a future program year (none expected to be completed during the Fifth Action Year). 3) To decrease the number of homeless households with children by providing rapid re-housing and prevention resources for one hundred twenty (120) families. 4) To reduce evictions by providing legal services for up to one hundred (100) individuals and families. 5) To provide health care services to over 1,500 low income and homeless individuals. 6) To provide shelter and outreach services for one thousand (1000) youth and elderly individuals, victims of domestic violence, and individuals with mental illness. The total ESG allocation is \$415,903 of which \$29,113.21 (7%) will be used for administration. The ESG funding recommendations totaled \$366,940 in 2018 and are itemized in the Appendices (Appendix 8). The highlighted line items in the funding recommendations totaled \$193,000 and represented projects that were not related to shelter and outreach (52.6% of the total expenditures exclusive of admin). ESG allocations for 2019 have not been determined at the time of this report.
Target Date	6/30/2020
Estimate the number and type of families that will benefit from the proposed activities	It is projected that two thousand (2,000) extremely low income homeless households and/or individuals at risk of becoming homeless will access ESG services.
Location Description	City-wide

	Planned Activities	Housing for the chronically homeless, supportive case management and social services, employment assistance, rapid re-housing, homelessness prevention, and ongoing planning for a public facility for homeless youth.
28	Project Name	HOPWA Activities
	Target Area	City-wide
	Goals Supported	STRMU for Persons with HIV/AIDS- HOPWA TBRA for Persons with HIV/AIDS- HOPWA
	Needs Addressed	Housing Availability-Persons With HIV/AIDS
	Funding	HOPWA: \$793,749
	Description	Tenant Based Rental Assistance (TBRA) will be provided to fifty (50) low or extremely low-income households to prevent homelessness. Short Term Rent, Mortgage and Utility (STRMU) assistance to prevent homelessness will be provided for 115 eligible persons or households. Other HOPWA eligible activities will also be supported with these funds. The total HOPWA allocation is \$793,749 of which \$23,812.47 is set aside for City of Oklahoma City administration (3%). An additional \$31,749.96 is allocated to Sponsor Administration (7% of the award exclusive of City Administration).
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 165 low income households affected by HIV/AIDS will benefit from the proposed activities.
	Location Description	City-Wide
Planned Activities	Tenant Based Rental Assistance, and Short term rental, mortgage and utility assistance to prevent homelessness. Additional activities will also be supported (e.g. services, healthcare, etc.)	
29	Project Name	OCHA Property Inspection Program-Housing Service
	Target Area	City-Wide
	Goals Supported	Affordable Housing-AHDP and RHP- CDBG and HOME
	Needs Addressed	Quality of Affordable Housing
	Funding	CDBG: \$90,000

	Description	A new program was authorized with a Substantial Amendment in April 2019 to allow City Staff in the Planning Department's Housing Rehab to inspect housing units owned by OCHA. Staff time will be paid initially from CDBG and subsequently invoiced to OCHA for reimbursement. Proceeds from the paid invoices will be credited as Program Income and made available for reallocation. Funding includes \$40,000 carried forward from 2018-19 and new allocation of \$50,000 in 2019-20.
	Target Date	June 30, 2020
	Estimate the numbers and type of families that will benefit from the proposed activities	This is a new program and projections are unknown at present. In future program years, estimated benefit will be based on the actual number of inspections performed and invoiced from prior year activity.
	Location Description	City-wide
	Planned Activities	Performance of property inspections-Housing Services.
30	Project Name	Walnut Development Project-Nonprofit Mixed Income Acq./Utilities
	Target Area	Neighborhood Revitalization Strategy Area
	Goals Supported	Affordable Housing Development- CDBG and HOME
	Needs Addressed	Supply of Affordable Housing
	Funding	CDBG: \$350,000
	Description	\$350,000 allocated from reprogrammed funds to assist in lot acquisition and utility installation by non-profit developers for the construction of single family mixed-income housing development.
	Target Date	June 30, 2020
	Estimate the numbers and type of families that will benefit from the proposed activities	Funds will be used to purchase a 2.07 acre parcel for future mixed-income housing development, and to fund water line installation to the property. \$300,000 will be used for acquisition and \$50,000 to construct the new water line. Future beneficiaries will be the low-moderate income families who purchase the affordable units. No units are expected to be completed during the Fifth Action Year Plan.
	Location Description	Neighborhood Revitalization Strategy Area
Planned Activities	Lot acquisition and installation of utilities	

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

Basis for Category Priority

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

4. Preservation of existing housing stock, particularly in the Neighborhood Revitalization Strategy Area where the greatest concentration of lower-income persons and minorities reside. Funding is allocated to fund rehabilitation of private homes, provide for emergency home repair, exterior maintenance repair, and rehabilitation of public housing units.
5. Permanent housing for the chronically homeless including persons with serious mental illness, substance abuse, and other disabilities. Funds can be allocated to match other grant in aid programs, or to accumulate sufficient funds to start a sponsored permanent housing project.
6. Emergency shelter and the provision of social services to homeless persons, families, and special needs populations is a high priority. All Emergency Solutions Grant funds are allocated to provide shelters with operating funds and services to care for this special population.
7. Down payment and closing cost assistance to increase the affordability of home ownership.
8. Increasing the supply of affordable housing is a high priority. Community Housing Development Organizations (CHDOs) and other developers are eligible to apply for allocations of HOME funds to construct new homes, or purchase/rehab homes for eligible owner households.
9. Objectives that improve the quality of owner housing have a high priority including emergency home repair, housing exterior maintenance and whole house rehabilitation.
10. Objectives that improve the quality of public housing have high priority.

Obstacles to Meeting Underserved Needs

Resources are insufficient to address all community needs, even those of high priority. Perceptions persist that affordable housing will decrease property values and facilitate other societal problems. Job creation and economic development are highly dependent on the oil and gas industry which maintains a disproportional presence in the local economy. Inadequate educational funding from the State of Oklahoma has adversely impacted neighborhoods and remains a barrier to the recruitment of new businesses. Likewise, state funding for mental health services remains well below the national average, creating a vast need for social services resources. The regulatory public service cap on CDBG funds limits the City's ability to support these types of activities.

AP-50 Geographic Distribution – 91.220(f)

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

The City of Oklahoma City is the largest city in the State of Oklahoma in both population and land area. Based on 2010-2017 ACS data, The City of Oklahoma City population is estimated at 629,191 persons contained within a land area of over 620 square miles. The community is racially diverse with a total minority population exceeding 31%. The minority population in Oklahoma City remains in transition. In the 2016 American Community Survey, persons of Hispanic or Latino origin represent 18.5% of the total population. African American persons, formerly the largest minority/ethnic population in Oklahoma City, now comprise 14.3% of the total population. Black and African American families are disproportionately located in the eastern and northeastern Census tracts. The Hispanic and Latino population continues to be concentrated in the southwest and western Census tracts of the city.

The City of Oklahoma City applied for and received a Neighborhood Revitalization Strategy Area (NRSA) designation from HUD that consists of all or part of 45 low-income census tracts covering an area of approximately 29.5 square miles. In addition, the NRSA contains approximately 20 square miles that lie within an area designated by HUD as both an Enterprise Community and an Empowerment Zone (Round III). The Empowerment Zone designation expired December 31, 2017. It is unknown if it will be reconstituted or eliminated. The NRSA is the area of the central city that contains the highest rates of poverty in the City and the largest number of substandard residences – many of which require some remediation for lead-based paint. The Census Tracts and Block Groups that comprise the NRSA include: 100400, 100500, 100700, 101000, 101100, 101200, 0101300, 101400, 101500, 101600, 101900, 102400, 102500, 102600, 102700, 102800, 102900, 103000, 103101, 103102, 103200, 103300, 103400, 103500, 103601, 103602, 103700, 103800, 103900, 104000, 104100, 104200, 104300, 104400, 104600, 104700, 104800, 104900, 105600, 105700, 105800, 1053002, 1053003, 1070012, 1070013, 1070014, 1070021, 1070022, and 1073051.

Geographic Distribution

Target Area	Percentage of Funds
Neighborhood Revitalization Strategy Area (NRSA)	80
Strong Neighborhoods Initiative (SNI) neighborhoods	

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City targets resources strategically to support neighborhood revitalization efforts in the areas with the greatest community need. The NRSA was chosen because it surrounds the center of the city, and contains a large segment of the lower-income population who need residential assistance and remediation of lead-based paint. The NRSA received its designation in part based on documented need, its geographic location encompassing much of the central city, and its concentration of lower income

residents. As a result, the City of Oklahoma City will continue to focus on the NRSA as the area where most federal funds will be expended to benefit the largest numbers of lower-income residents and areas of greatest need within the community.

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

Discussion

The City of Oklahoma City strives to invest 80% of federal CDBG and HOME dollars within the NRSA, with an additional 20% allocated to projects and activities outside the NRSA boundaries. The SNI neighborhoods lie within the NRSA and are strategically targeted for reinvestment. Resources are allocated to SNI neighborhoods to the greatest extent possible. Two (2) SNI neighborhoods, Capitol View and Capitol Hill were selected during the Third Action Plan Year for participation in the SNI program. Investment in these two new neighborhoods is expected to exponentially increase in the new program year as the planning stage begins to transition towards implementation. Classen North Highlands Park was identified in the Third Action Year as self-sustaining and no longer eligible for SNI support. Work in Classen Ten Penn was completed in the Fourth Action Plan year. The Culbertson's East Highlands neighborhood has not met established goals and will continue to receive SNI support in the Fifth Action Plan Year.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The objectives of the 2015-2020 Consolidated Plan were developed through review and analysis of CHAS data, consultations with service providers, input from citizens on the development of the plan, and an analysis of community needs and objectives as identified in the Needs Analysis. In the 2019-20 Fifth Action Year Plan, the City of Oklahoma City continues to prioritize annual allocations based upon the objectives identified in the Consolidated Plan.

In general, the objectives contained in the Consolidated Plan primarily focus on stimulating neighborhood revitalization by encouraging the development and rehabilitation of affordable owner housing, and by activities that stimulate affordable home ownership. These objectives continue to inform the funding process in the Fifth Action Plan Year. The Consolidated Plan rental housing objectives call for the creation of affordable rental housing to address special needs populations and for targeting affordable rental housing for the elderly and families by size and income range. The Plan objectives that relate to the homeless and persons with special needs, including persons with HIV/AIDS, focus on program activities designed to provide housing assistance and social services to the underserved populations.

The one year housing goals noted below are based on proposed goals and activities for the 2019-2020 Annual Action Plan year. The estimates provided do not include the provision of emergency shelter, transitional shelter, or social services. The numbers for rehabilitation include whole house rehab, public housing unit rehabs, and emergency home repairs. Units purchased using down payment assistance are included in the “production of new units” field.

One Year Goals for the Number of Households to be Supported Through:	
Homeless (case management, rapid rehousing)	270
Non-Homeless (legal assistance)	100
Special-Needs (FirstStep SRO)	20
Total	390

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

One-Year Goals for the Number of Households to be Supported Through:	
Rental Assistance (TBRA, STRMU)	165
The Production of New Units (CHDO, DPA)	41
Rehab of Existing Units (Whole house, HEMP, ER, SNI, Public housing)	170
Acquisition of Existing Units (HOP)	1
Total	377

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

Discussion

The City does not presently have a program to assist cost burdened homeowners with subsidies for mortgage or utility payments. However, in response to public comments received at community forums, TBRA programs are being explored as a potential use of future funds.

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

Senior citizens that are 62 years of age or older and have gross household income less than 60% of median at the time of application are eligible for a “Senior Loan” (a 5-year forgivable loan amortized at the rate of 1/60th a month). The borrower must continue to occupy the property for the term of the loan. If occupancy is terminated, whether voluntarily or involuntarily, any remaining balance generally must be repaid. An exception is made for seniors who are incapacitated, and the loan may be forgiven if the applicant passes away or is placed in an establishment that provides housing and general care for the aged or convalescent.

The cost of lead-based paint abatement within a housing rehab project is provided in the form of a grant

with a \$15,000 limit and is not added to the forgivable rehabilitation loan.

Programs to Assist Homeowners:

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

Projected 2019-2020 Housing Accomplishments:

- 90 Emergency home repairs
- 45 Exterior Maintenance projects
- 27 Whole house rehabilitation projects
- 33 Down Payment Assistance Loans
- 8 CHDO Homes Constructed
- 8 Public Housing Unit Rehabs
- 165 Persons Provided Rental and/or Utility Assistance

AP-60 Public Housing – 91.220(h)

Introduction

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

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

The City of Oklahoma City will continue to work with OCHA to increase the overall quality of public housing. Presently, the Housing Authority has sufficient resources to manage their properties; however, are unable to make all the needed upgrades and repairs. All housing is considered "average" by the Housing Authority. The City will provide CDBG funding for rehabilitation of approximately eight (8) public housing units.

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

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

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

Not Applicable

Discussion

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

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

Introduction

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

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

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

To reach unsheltered homeless individuals and families, ESG funds are used for outreach activities to help connect this population with emergency shelter, housing, and/or services. Assistance is sometimes extended to non-facility based medical/mental health care if recipients of that care are unable or unwilling to access an appropriate health facility. The City also conducts an annual Point-in-Time (PIT) count each January to identify current trends and service needs in the community. ESG funds continue to support housing and case management activities for families and veterans. ESG funding is also committed for rapid re-housing and prevention services for homeless households with children. In the Third Action Plan Year, a drop-in center for homeless youth was moved and expanded and some shelter capacity was added. Additional facilities are under discussion to the extent that resources allow; however, none are expected to be constructed or completed during this Fifth Action Plan Year.

HOPWA funding is used to support the provision of Short Term Mortgage and Utility Assistance (STRMU) and Tenant Based Rental Assistance (TBRA).

Addressing the emergency shelter and transitional housing needs of homeless persons

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

assistance and case management, which tend to be more intensive and longer in duration. In some instances, direct financial assistance may be available to assist in the payment of rental and security deposits. Persons transitioning from homelessness are matched with the appropriate supportive case management services to ensure long term sustainability of housing.

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

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

The framework for case management in the rapid re-housing program will consist of Permanent housing services. Permanent housing services assist households in accessing housing within twenty-one (21) days of assessment and sustaining that housing for at least seven (7) months after exiting the program. This includes assisting the client in identifying affordable units, accessing housing subsidies, and negotiating leases. Clients sometimes require assistance in overcoming barriers such as poor tenant and credit histories, and discrimination based on ethnicity, gender, family composition and income source(s). Case managers utilize the Housing Resource Locator to identify appropriate housing.

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

The City partners with local service providers to direct homeless persons to the appropriate services and financial assistance resources required to achieve independent living. This may include assistance in obtaining permanent housing, medical treatment, mental health services, counseling, supervision, and

other government or private assistance, including:

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

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

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

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

The assigned case manager typically contacts the landlord or utility company immediately to pledge assistance in preventing or delaying imminent eviction or the disconnection of utilities. If the case manager/Housing Resource Locator deems the housing to be substandard, the case manager assists the

household and the Housing Resource Locator to identify and secure more appropriate housing. Program participants must demonstrate adequate earnings to sustain their permanent housing at the conclusion of program services.

While clients are participating in the prevention program, they are contacted by their case manager at least monthly for follow-up, or more frequently when necessary. Case managers conduct monthly follow-ups for nine (9) months after assistance has terminated to ensure housing stability.

Discussion

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

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

AP-70 HOPWA Goals– 91.220 (I)(3)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	115
Tenant-based rental assistance	50
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	165

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

Introduction:

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

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

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

Discussion:

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

AP-85 Other Actions – 91.220(k)

Introduction:

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

Actions planned to address obstacles to meeting underserved needs

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

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

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

Actions planned to foster and maintain affordable housing

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

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

construct, and in some cases, rehabilitate existing housing units in targeted neighborhoods. SNI funding for new housing construction is typically limited to non-profit organizations and is awarded on a competitive basis.

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

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

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

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

Public Housing Modernization is provided through the Oklahoma City Housing Authority (OCHA). OCHA is allocated CDBG funds to make needed repairs to approximately eight (8) public housing units annually.

A new activity in this Fifth Action Plan Year will provide CDBG funding to a local non-profit development team for land acquisition and construction of a water line to support the Walnut Development project; a mixed-income housing project.

Actions planned to reduce lead-based paint hazards

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

The City funds various activities that fall into the category of residential rehabilitation. Whenever residential rehabilitation activities funded by the City are conducted, the regulations prescribed for lead-based paint, contained at 24 CFR Part 35 will be the guide for achieving compliance. Under the

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

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

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

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

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

Actions planned to reduce the number of poverty-level families

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

The initial MAPS initiative was followed by a larger "MAPS for Kids" initiative that included new construction and/or renovation of virtually all public school buildings in the Oklahoma City Public School

District, and provided significant revenue for improvements in suburban school districts that educate children of Oklahoma City residents. Education serves as the cornerstone of most effective anti-poverty strategies. Currently, state funding for teachers and education continues to lag far behind the national average, resulting in dwindling resources for schools and classrooms. Non-competitive teacher's salaries have led to mass out-migration of qualified educators to neighboring states. Last year's teacher strikes led to some salary increase, but our public schools remain chronically underfunded.

The third MAPS initiative was passed in December 2009 and all projects are complete or well underway. MAPS 3 provided funding for a seventy (70) acre downtown regional park, a 4.5-mile electric streetcar route, a new downtown convention center (including successful negotiation for an adjoining Omni convention center hotel), neighborhood sidewalks and trails, aquatic centers for seniors, additional improvements to the Oklahoma State Fairgrounds and a white-water course on the Oklahoma River. The exhibition center at the State Fairgrounds was completed and opened during the Second Action Plan Year. The senior centers and the Will Rogers Trail were completed in the Third Action Plan Year. The streetcar route became operational during the Fourth Action Plan Year. Land acquisition for the downtown Core to Shore Park is complete, environmental studies have been completed and landscaping is underway. The north portion of the park is expected to open in Fall 2019, with construction on the south park to begin shortly thereafter. The MAPS funded projects are expected to equitably enhance transportation options, wellness, and quality of life for all residents.

The total public investment in all three MAPS programs is over \$1.8 billion. Discussion of a potential fourth MAPS vote is underway and community input is being solicited to identify potential projects. A new Mayor and three (3) new City Council members were elected in the past year and their goals and priorities for the City will ultimately impact future programmatic decisions.

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

Actions planned to develop institutional structure

The City has formed partnerships with the Chamber of Commerce and area banks to participate in and deliver economic development services and funding. The CAA is funded to conduct an economic development activity and the City directly funds economic development activities with CDBG funds and the Section 108 Loan Guarantee Program. The City's ongoing economic development programs and Section 108 Loan Guarantees generally include the participation of local lenders. Partnering banks

include Bank of Oklahoma, Bank of America, BankOne, First State Bank, Legacy Bank, Arvest, Bank 7 and InterBank (among others) to assist with the Murrah District Revitalization Program, CAA small business loan program, Current Section 108 Loans, Section 108 Small Business Fund, and Housing assistance to lower-income persons and special populations. Funding is provided through multiple community partners including OCHA, CAA, NHS, City Care, designated CHDOs, Oklahoma State Department of Commerce, and CEC.

Assisted social service agencies that serve the homeless with shelter, essential services and homeless prevention through the ESG and general social services funds of the City include YWCA, Be the Change, Upward Transitions, Heartline 211, , Neighborhood Services Organization (NSO), Homeless Alliance, Red Rock Behavioral Health Services, OKC Metro Alliance, HOPE Community Services, Sunbeam Family services, Legal Aid, Pivot, Urban League, SISU Youth, Center for Employment Opportunities, Positive Tomorrows, and Community Health Centers.

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

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

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

Discussion:

In addition to the above initiatives, direct home ownership assistance is provided with HOME funds to down payment and closing cost assistance provider(s). Funding to the down payment assistance (DPA) provider(s) is targeted at 80% (when practicable), and 20% between the NRSA and the remainder of the DPA lending area. The Targeted area generally encompasses the NRSA, CHDO Construction developments and other non-profit affordable housing developers and any low/mod areas specifically targeted for home ownership funding. The General DPA portion of the program includes low and moderate-income areas contained within a program boundary extending from South 89th Street to

Memorial Road, and from Bryant to Meridian Avenues. Please refer to the DPA Program Area Map in the appendices (Appendix 5).

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

Program Specific Requirements

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

Introduction:

Program Income (PI)-The City does not anticipate additional CDBG PI prior to June 30, 2019. \$1,592,675 has been received during the fourth Action Plan year and is available for reallocation. A total of \$75,000 is anticipated in the Fifth Action Plan Year (2019-20). \$1,213,713.01 in 2018 recaptured CDBG funds are available for allocation. Oklahoma City does not expect to receive PI during the program year from float funded activities. CDBG funds capitalized a \$750,000 revolving loan fund (RLF) in 2015. One loan has closed under this program. Annual RLF program income from this single RLF transaction is projected at \$5,362.32 in the Fifth Action Plan Year. Oklahoma City has not invested CDBG funds in float funded activities. PI that is received will be allocated as follows: 1) PI generated from Section 108 Loan investment and repayment accounts will be used to pay Section 108 principal and interest; 2) PI that is generated by the Oklahoma City Urban Renewal Authority (OCURA) activities during the current program year may be reallocated back to OCURA for use in other CDBG eligible activities subject to review and approval by The City and compliance with all contractual requirements for use of these funds; 3) CDBG funding rebates provided by material suppliers from Oklahoma City Housing Assistance Program activities will be allocated to the Oklahoma City Housing Assistance Program to assist with funding additional Housing Exterior Maintenance projects; 4) 20% of all CDBG PI will be used to create additional administrative capacity, and CDBG PI may be used to fund administrative expenses during the program year in which it is realized; and 5) In accordance with CPD Notice 97-9, III.J., HOME PI deposited to the PJ's letter of credit that creates additional administrative capacity may be used by the PJ for administrative expenses incurred during the Action Year, and any excess administrative capacity will be carried forward to subsequent years.

(Continued in "Description of Other Forms of Investment" Section (Item no. 1 Below) due to character limit restrictions)

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

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

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

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3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	2,285,037
5. The amount of income from float-funded activities	0
Total Program Income:	2,285,037

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - The City uses a consecutive period of three years to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. The Fifth Action Year Plan will begin the second year of the 3-year ratio period.	70.00%

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

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

Continued from Introduction Above....Preceding Program Year Income-Oklahoma City forecasts PI and allocates the forecasted PI in Annual Action Year Plans. All PI is reported in IDIS and in financial reporting to HUD. **Section 108 Proceeds-**Proceeds from Section 108 Loan Guarantees have been utilized to stimulate economic development and create low and moderate-income jobs. All Section 108 Loan Guarantees have been fully disbursed. The Small Business Assistance Section 108 Loan was established to provide access to capital for small businesses located in the NRSA. Proceeds from loan payments and interest earned on all loan repayment accounts associated with the Section 108 Loan Guarantees are used to make debt service payments. In April 2019 a Substantial Amendment to the Fourth Action Year Plan was approved authorizing a new Section 108 Loan Program to facilitate payment of certain pre-award soft costs for a Section 108 loan to First National Center, subject to HUD approval of final loan documents. No disbursements will be made during the 2018-19 or the 2019-2020 program years. **Surplus Funds-** The City of Oklahoma City received a return of \$1,592,675 in 2018-19 CDBG PI prior to the beginning of the Fifth Action Year Plan. Conservatively, no additional Program Income has been projected in 2019-20 for allocation purposes; however, it is expected that some will be received. A total of \$1,213,713.01 in 2018-19 recaptured funding is available for allocation. FY 2018-19 HOME PI and unallocated program funds in the amount of \$450,000 is available for allocation during the Fifth Action Year Plan with an additional \$50,862 in unprogrammed funds and \$80,000 in PI (estimated) for FY 2019-20. **Grant Funds Returned-**No CDBG funds have been returned to the letter of credit. **Income from Float Funded Programs-**Oklahoma

City will not utilize float funding for program activities and therefore no income will come from float funded activities. **Urgent Needs**-No urgent need activities are included in the Fifth Action Year Plan. **Allocation of CHDO Loan Pool Funding to Set-aside activities**- When practicable, CHDO funds may be reallocated from the CHDO loan pool to the CHDO Set-aside activities to ensure timely allocation and efficient use of these resources in the production of affordable units.

NOTE: In reference to item no. 2 above under the "Other CDBG Requirements" section, the City of Oklahoma City began its 3-year ratio in the First Action Plan Year. The ratio calculation began a new three-year period in the Fourth Action Plan Year which will cover the years 2018-19; 2019-20; and 2020-21 (70% of a 3- year average beginning in FY 2018-19 as year one). This Fifth Year Action Plan is year two (2) of the 3- year ratio average.

Unallocated 2018-19 HOME funds in the amount of \$450,000 are available to re-allocate. 2019-20 HOME Program Income of \$80,000 is anticipated, of which \$0 is estimated to be returned to the CHDO Loan Pool, \$800 to HOME program Administration, and \$79,200 to the Affordable Housing Program. \$450,000 in recaptured HOME funds from 2018-19 represent the funds available for reallocation.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

CoC competitive grant and a commitment of matching HOME funding. The City, through community partnerships has worked to create permanent supportive housing beds in its effort to eliminate homelessness.

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

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

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

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

5. Describe performance standards for evaluating ESG.

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

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

The City of Oklahoma City offers a “no wrong door” approach, with providers being well linked to available resources through networking connections gained via the Coalition To End Poverty. In addition, 211 is the information and referral agency which provides information about eligibility and referrals to service agencies. 211 conducts public awareness campaigns throughout the year with public service advertisements located on television, radio, on city buses and signage. People are linked to public benefits through provider agencies. All agencies have been trained to assist people in applying for benefits through Social Security and Medicaid. Training was conducted through the SSI/SSDI Outreach, Access and Recovery grant (SOAR). In 2013, the City of Oklahoma City also joined the 100,000 Homes Campaign in an effort to move the medically frail and chronically homeless individuals into permanent housing using a housing first approach. As part of this process, members of the chronically homeless population are administered a vulnerability index survey to determine their health issues. Those determined to be the most medically frail are prioritized for immediate placement into housing. A

case management committee comprised of various service providers assigns a case manager as needed. The case manager and service provider are selected and assigned based upon the needs of the individual being housed. Since joining the 100,000 Homes Campaign at the beginning of 2013, local non-profit service providers have collaborated to house over 1000 chronically homeless individuals, exceeding their goal by more than 40%.

Discussion: ESG Policies and Procedures are attached (**Appendix 8**)

Attachments Grantee Unique appendices

APPENDIX 1

CONSOLIDATED PLAN TIMELINE

**TENTATIVE CALENDAR FOR THE
2019-20 CONSOLIDATED PLAN FIFTH ACTION YEAR**

2018

- December 7 Identify and reserve facilities for public meetings in mid-January
- December 11 Submit *Notice of Public Hearing*/planning input session to OPUBCO prior to the Holidays
- December 19 *Notice of Public Hearing* published for public hearing/planning input sessions to be held at *Sunbeam Family Services* at 6:00 pm, January 22, 2019 and 3:00 pm January 24, 2019

2019

- January 22 Conduct public meeting/planning input session, 6:00 p.m. (Sunbeam Family Services)
- January 24 Conduct public meeting/planning input session, 3:00 p.m. (Sunbeam Family Services)
- March 12 Citizens Committee for Community Development meeting presentation to provide feedback from citizen input meetings, anticipated funding available, and funding priorities for the 2019-20 Consolidated Plan Fifth Action Year; and to discuss preliminary funding recommendations.
- April 18 Final allocations announced by HUD
- April 25 Combined Notice to be submitted to OPUBCO for publication (*Combined Notice for 30-day comment period and Notice of Public Hearing at Council on 6/4*)
- May 3 Publication of Combined Notice of 30-day comment period and Notice of Public Hearing.
- May 2-May 10 CD Staff to finalize funding priorities and recommendations
- May 3 Staff reports due for CCCD special meeting
- May 8 Special meeting required. Consideration by the Citizens Committee for Community Development of “**final**” funding recommendations for consideration by City Council
- May 10 Written and electronic public comments are due to Staff by 5:00 p.m. for inclusion in Council presentation. Additional feedback may be provided on or before the June 4th public hearing for inclusion in the final HUD document.
- May 14 Begin routing process for documents in SIRE. (Need a quick pre-review turnaround from Planning Director. If unable to make the June 4th docket, an extension from HUD will be required). (*must include a near final draft of the plan that will be submitted to HUD*).
- May 28 Clerk’s office deadline for June 4th City Council meeting.
- June 4 City Council public hearing and action on the Consolidated Plan Fifth Action Year
- June 17 Submit 2019-20 Consolidated Plan Fifth Action Year to HUD (*Due to HUD on or before than June 17, 2019*).

APPENDIX 2

CITIZEN PARTICIPATION COMMENTS

2019-20 FIFTH ANNUAL ACTION YEAR PLAN

Public Meeting #1 (6:00 p.m. January 22, 2019)
Sunbeam Family Services
1100 NW 14th St
Oklahoma City, OK 73106

Attendees: **11** (5 community members, 6 staff members)

Question: How long can youth stay at the youth shelters?

A representative present from SISU Youth Services responded that shelter may be provided up to 90 days depending on availability of beds and compliance with agency requirements. They have sixteen (16) beds available. Services are limited to youth ages 15-22. Shelter check-in each night begins at 7:00 p.m. and the youth need to leave each morning for the day.

There is also a drop-in center available on Sunday, Monday and Wednesday from 4:00-7:00 p.m., and on Saturdays from 11:00 a.m. to 2:00 p.m. **Comment:** The representative stated there is a need to establish additional options for places where youth can go during the day.

Comment: Lack of affordable housing remains a significant problem.

City Staff responded that we are aware of the need, which is a frequently noted and growing concern. Significant allocations of HOME funds for down payment assistance, whole house rehabs and CHDO construction continue to be funded from our annual allocations. HOME funds have been provided to OCURA for construction of single family homes. A small amount of CDBG funds is provided to the housing authority for rehabilitation of a few units each year, and to support the City's exterior maintenance and emergency repair programs. Many of the needs in the community, specifically to support operations needed for transitional housing are difficult to fund because we are limited by the 15% public services cap.

Question: Several commenters indicated there is a need for more short term rental and utility assistance to keep people housed. Can funds be used for Rent and Utility assistance?

Staff responded that TBRA is an eligible activity under the HOME program, but the City has not previously had a program to use HOME in this way. Assistance has been historically provided under the HOPWA program to provide Tenant Based Rental Assistance and Short Term Rental, Mortgage and Utility assistance to persons facing an HIV/AIDS related housing crisis.

Comment: Façade improvement and small business assistance programs are needed.

Staff responded that CDBG funds are provided to the Community Action Agency to provide small business training and services. Façade improvements may be eligible under our Public Facilities Program in limited instances (primarily non-profits). An RFP is currently open for project proposals.

Comment: Transportation services need to improve, especially on Sundays.

COTPA staff was present and responded that Sunday service will become available on January 27th. Streetcars are currently providing limited service on Sundays. Discussions are underway to make the Sunday routes permanent. City Staff commented that the City has provided CDBG funding to COTPA for many years to fund discounted bus and taxi fares for special needs populations.

Question: Is there a funding source for primary health care and mental health services?

Staff responded that the City is very limited on the ability to support these types of activities because of the public service cap. Most are funded through the Continuum of Care which is not part of the entitlement grants covered under this Action Plan. Resources are woefully inadequate to address the present need.

Question: Are funds available to provide a new façade for the building providing health services to low income clientele which is located at 411 NW 11th next to the Palo Duro permanent supportive living center?

Staff responded that this may be eligible for funding under the Public Facilities Program. Participant was provided with information on how to access the open RFP.

Comment: Appreciation was expressed for the City's efforts in addressing homelessness, specifically the addition of dedicated staff, prioritization from the Mayor's office, and the improvement of cold weather shelter provisions.

2019-20 FIFTH ANNUAL ACTION YEAR PLAN

Public Meeting #2 (3:00 p.m. January 24, 2019)
Sunbeam Family Services
1100 NW 14th St
Oklahoma City, OK 73106

Attendees: **28** (22 community members, 6 staff members)

Question: Are SNI funds available to neighborhoods other than the ones designated?

Staff responded that funds allocated to SNI must be spent solely within the SNI designated neighborhoods. The City once had a program for neighborhoods throughout the City to apply for grants; however, with over 620 square miles of neighborhoods, the impacts from funds were hardly noticeable. Today's model is to focus the resources in specified areas to make a greater synergistic impact and create real change which hopefully will positively affect the surrounding areas as well.

Other allocated funds are targeted to be spent within the Neighborhood Revitalization Strategy Area to the greatest extent possible. Funds not expended within the NRSA, which is inclusive of all SNI Neighborhoods, may be spent in other areas of the City provided that other eligibility criteria are met.

Question: Is there a resource available where we can access the SNI neighborhood boundaries?

Staff responded that SNI designated neighborhood boundaries are available on the City's website at <https://www.okc.gov/departments/planning/programs/strong-neighborhoods-initiative>

Comment: The City needs more affordable housing, especially sober living facilities and supportive services.

Staff responded that we are aware of the need, which continues to be a frequently noted and growing concern. Transitional housing for people graduating from addiction rehabilitation programs is often cited as a serious problem that frequently results in homelessness. Some support services are funded through the Continuum of Care; however, this Action Plan does not cover that program. The 15% public services cap on CDBG makes it extremely difficult to address these needs. We currently are funding a healthcare provider which serves homeless and extreme low income persons. We also support a Public Facilities Program with CDBG funds. An open RFP for these funds currently exists and may provide some opportunity for the construction or rehabilitation of provider facilities. Staff is available to discuss specific projects or proposals to determine eligibility.

Comment: Rental housing conditions are often dangerous or inadequate when Section 8 vouchers are not used.

An attorney from a legal services provider was present and spoke extensively to this issue. It was noted tenants with no other recourse are placed in an untenable position of either remaining in inferior housing or breaking a lease- assuming they can find other housing options to go to. Oklahoma City presently has about 20 evictions per day- one of the highest rates in the nation. Evictions exacerbate the problem by making it nearly impossible for the evicted party to obtain new housing. He noted community dialog on this issue is desperately needed. In addition to the housing quality issue, it is difficult to house persons with substance abuse problems, felony convictions, mental health issues and sexual offenders. Participant noted that Tulsa is considering a program which requires mediation prior to eviction. The speaker emphasized that he was advocating for continued funding of legal service providers. Although these funds are minimal, they are valuable in leveraging other private sector grants and resources and are much needed to ensure that low income families receive the support they need to access or remain in affordable housing.

Comment: Five participants of the FirstStep program were in attendance and spoke to the importance of the funding provided for that organization. Appreciation was expressed for the treatment received.

Question: Can CDBG be used for acquisition and rehab?

Staff responded that these can be eligible activities when the project benefits persons with low to moderate income.

APPENDIX 3
GLOSSARY OF TERMS

Glossary

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

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

APPENDIX 4
ANNUAL OBJECTIVES TABLE

Consolidated Plan Objectives

2019-
2020
Objective

Decent Housing Activity Objectives Descriptions

<i>Quality of Affordable Owner-Occupied Housing</i>	
Housing Assistance Program- Whole House Rehab (HOME)	20
Housing Exterior Maintenance Program and (CDBG)	45
CAA Emergency Home Repair Program (CDBG)	90
SNI Whole House Rehabs (HOME)	7
<i>Quality of Public Housing</i>	
Rehabilitation of Public Housing Units (CDBG)	8
<i>Affordability of Owner-Occupied Housing</i>	
Targeted Area Down Payment Assistance (HOME)	23
Non-Target Area Down Payment Assistance (HOME)	10
<i>Supply of Affordable Owner-Occupied Housing</i>	
CHDO Set-Aside-New Construction of Single Family Homes (HOME-SNI)	8
OCURA Affordable Housing Development (CDBG/HOME)	1
Non-Profit Housing Construction- SNI (HOME)	0
<i>Supply of Affordable Rental Housing</i>	
First Step- SRO's (CDBG/ HOME)	20
<i>Availability of Housing for Persons with HIV/AIDS</i>	
Short Term Rent, Mortgage, and Utility Assistance to Prevent Homelessness (HOPWA)	115
Tenant Based Rental Assistance to Prevent Homelessness (HOPWA)	50

<i>Supportive Housing for the Chronically Homeless</i>	
Housing and Case Management Resources for the Chronically Homeless, Families and Veterans (ESG)	150
<i>Sustainability of Transitional Housing</i>	
Reduced evictions for individuals and families by providing legal services (ESG)	100
<i>Provision of Emergency Shelter and services for at-risk populations</i>	
Shelter and outreach services to homeless youth and seniors, victims of domestic violence, and individuals with mental illness (ESG)	1000
Health care services to low income and homeless individuals (ESG)	1500
<i>Housing Opportunity for Homeless Households with Children</i>	
Provide Rapid Re-Housing and Prevention Services for Homeless Households With Children (ESG)	120
Suitable Living Environment Objectives Description	2019-2020 Objective
<i>Improve quality and sustainability of neighborhood health</i>	
Trim and/or remove hazardous trees that pose a threat to personal and public safety in the SNI neighborhoods (CDBG)	20
<i>Services for Homeless Youth</i>	
Development of a Drop-In Center for Homeless Youth (ESG) (<i>In Planning stage</i>)	0
<i>Public Facilities, Services, and Infrastructure Improvements</i>	
Sidewalks and infrastructure within the SNI neighborhoods (CDBG)	0
Tree Planting in SNI neighborhoods (CDBG)	50
Park improvements in SNI neighborhoods (CDBG)	1
<i>Strengthen Neighborhood Capacity</i>	

SNI Neighborhood-led improvement projects (CDBG)	3
After-school tutoring and enrichment programs for students in the three (3) SNI elementary schools and two (2) middle schools (CDBG)	500
<i>Acquisition/Clearance of Vacant, Blighted Property</i>	
Urban Renewal Authority- Acquisition, Disposition, Relocation, and Completion to Address Slum and Blight (CDBG)	1
<i>Graffiti Removal</i>	
Remove Graffiti in Low-Moderate Income Neighborhoods to Prevent Crime (CDBG)	450
<i>Transportation Options for Special Needs Population</i>	
COTPA (EMBARK) Share-A-Fare Program-Subsidized Bus and Taxi Service for Special Needs Population (CDBG)	15,350
<i>Address Slum and Blight</i>	
Secure Vacant and Abandoned Properties (CDBG)	100
<i>Sustainability of Service Provider Facilities</i>	
Community Development Public Facilities Program (CDBG)- <i>Projects not yet fully vetted</i>	2

Economic Opportunity Objectives Description

**2019-2020
Objective**

<i>Economic Opportunities for Low and Moderate Income Residents</i>	
CAA Small Business Services Program- Technical Assistance (CDBG)	125

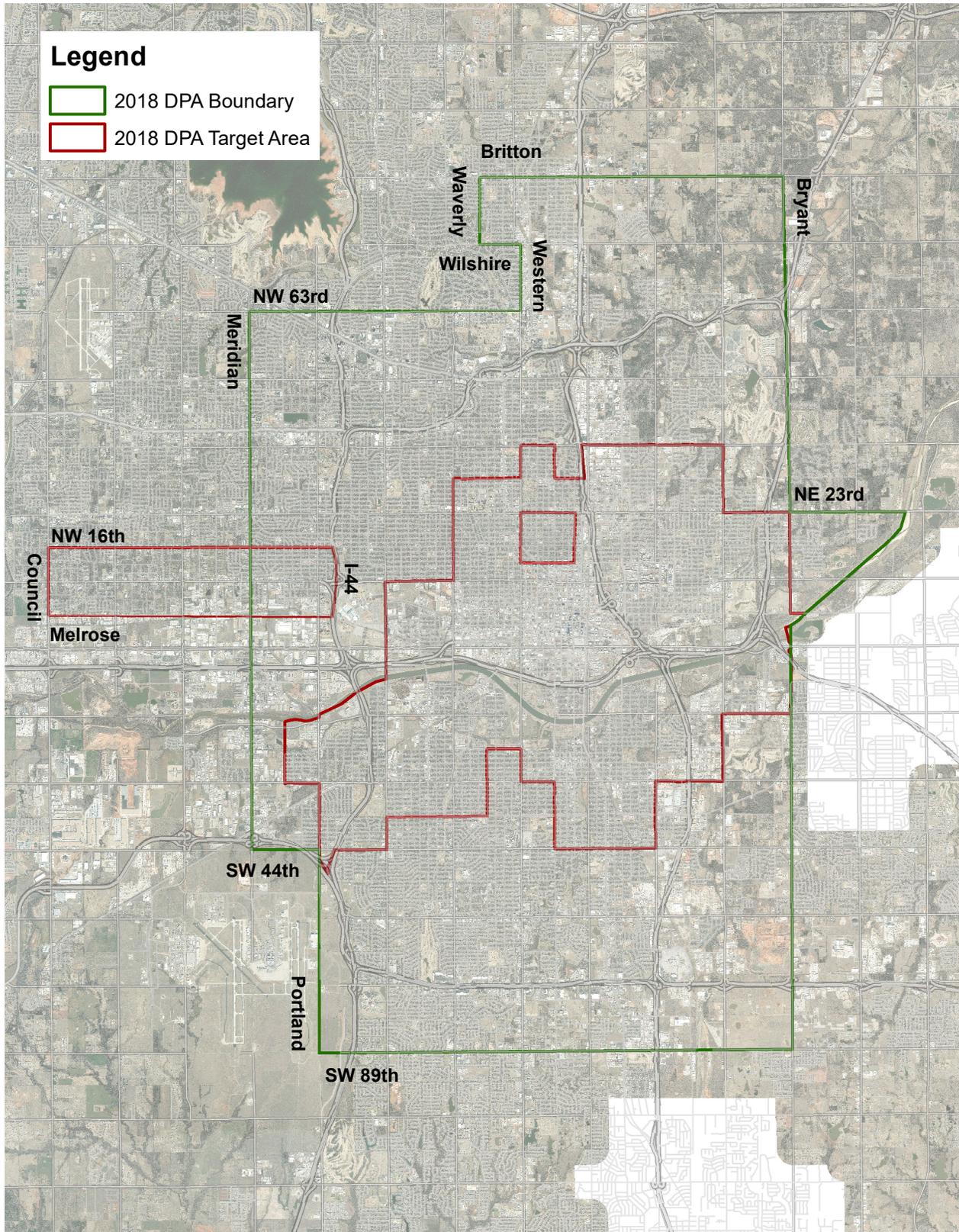
APPENDIX 5

DOWNPAYMENT ASSISTANCE PROGRAM

BOUNDARIES

OKLAHOMA CITY DOWN PAYMENT ASSISTANCE PROGRAM GUIDELINES

EXHIBIT 1



APPENDIX 6

SF-424 AND CERTIFICATIONS (COPIES)

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- Preapplication
- Application
- Changed/Corrected Application

*** 2. Type of Application:**

- New
- Continuation
- Revision

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

*** Other (Specify):**

*** 3. Date Received:**

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

The City of Oklahoma City

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

736005359

*** c. Organizational DUNS:**

0141047770000

d. Address:

*** Street1:**

420 W. Main St.

Street2:

Suite 920

*** City:**

Oklahoma City

County/Parish:

Oklahoma

*** State:**

OK: Oklahoma

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

73102-4437

e. Organizational Unit:

Department Name:

Planning Department

Division Name:

Community Development Division

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

Prefix:

*** First Name:**

Geoffrey

Middle Name:

*** Last Name:**

Butler

Suffix:

Title:

Acting Planning Director

Organizational Affiliation:

The City of Oklahoma City

*** Telephone Number:**

(405) 297-2288

Fax Number:

(405) 297-3796

*** Email:**

Geoffrey.Butler@okc.gov

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

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

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

Community Development Block Grants/Entitlement Grants

*** 12. Funding Opportunity Number:**

* Title:

13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

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

Community Development Block Grant (CDBG) program activities.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

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

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="4,869,051.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value="4,023,497.00"/>
* f. Program Income	<input type="text" value="1,592,675.00"/>
* g. TOTAL	<input type="text" value="10,485,223.00"/>

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

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

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

- Yes No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

** I AGREE

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

Authorized Representative:

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

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:

* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

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

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

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

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

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

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

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
The City of Oklahoma City	

Application for Federal Assistance SF-424

* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): _____ * Other (Specify): _____
---	---	--

* 3. Date Received: _____	4. Applicant Identifier: _____
-------------------------------------	--

5a. Federal Entity Identifier: _____	5b. Federal Award Identifier: _____
--	---

State Use Only:

6. Date Received by State: _____	7. State Application Identifier: _____
---	---

8. APPLICANT INFORMATION:

* a. Legal Name: The City of Oklahoma City		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 736005359	* c. Organizational DUNS: 0141047770000	

d. Address:

* Street1:	420 W. Main St.
Street2:	Suite 920
* City:	Oklahoma City
County/Parish:	Oklahoma
* State:	OK: Oklahoma
Province:	
* Country:	USA: UNITED STATES
* Zip / Postal Code:	73102-4437

e. Organizational Unit:

Department Name: Planning Department	Division Name: Community Development Division
--	---

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

Prefix: _____	* First Name: Geoffrey
Middle Name: _____	
* Last Name: Butler	
Suffix: _____	

Title: Acting Planning Director
--

Organizational Affiliation: The City of Oklahoma City

* Telephone Number: (405) 297-2288	Fax Number: (405) 297-3796
---	-----------------------------------

* Email: Geoffrey.Butler@okc.gov

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

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

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnerships Program (HOME)

*** 12. Funding Opportunity Number:**

* Title:

13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

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

HOME Investment Partnerships Program (HOME) activities.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

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

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="2,214,939.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value="3,910,702.00"/>
* f. Program Income	<input type="text" value="80,000.00"/>
* g. TOTAL	<input type="text" value="6,205,641.00"/>

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

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

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

- Yes
- No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

** I AGREE

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

Authorized Representative:

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

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:

* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

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

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

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
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6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
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11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
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18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	<input data-bbox="901 1318 1490 1354" type="text" value="Mayor"/>
APPLICANT ORGANIZATION	DATE SUBMITTED
<input data-bbox="138 1455 876 1486" type="text" value="The City of Oklahoma City"/>	<input data-bbox="901 1455 1490 1491" type="text"/>

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): _____ * Other (Specify): _____
* 3. Date Received: _____	4. Applicant Identifier: _____	
5a. Federal Entity Identifier: _____	5b. Federal Award Identifier: _____	
State Use Only:		
6. Date Received by State: _____	7. State Application Identifier: _____	
8. APPLICANT INFORMATION:		
* a. Legal Name: The City of Oklahoma City		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 736005359	* c. Organizational DUNS: 0141047770000	
d. Address:		
* Street1: 420 W. Main St.	_____	
Street2: Suite 920	_____	
* City: Oklahoma City	_____	
County/Parish: Oklahoma	_____	
* State: _____	OK: Oklahoma	
Province: _____	_____	
* Country: _____	USA: UNITED STATES	
* Zip / Postal Code: 73102-4437	_____	
e. Organizational Unit:		
Department Name: Planning Department	Division Name: Community Development Division	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: _____	* First Name: Geoffrey	
Middle Name: _____	_____	
* Last Name: Butler	_____	
Suffix: _____	_____	
Title: Acting Planning Director		
Organizational Affiliation: The City of Oklahoma City		
* Telephone Number: (405) 297-2288	Fax Number: (405) 297-3796	
* Email: Geoffrey.Butler@okc.gov		

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2 Select Applicant Type:

Type of Applicant 3 Select Applicant Type:

* Other (specify):

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

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.231

CFDA Title:

Emergency Solutions Grants Program

*** 12. Funding Opportunity Number:**

* Title:

13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

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

Emergency Solutions Grants (ESG) Program activities.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a Applicant

* b Program/Project

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

17. Proposed Project:

* a Start Date:

* b End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="415,903.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="415,903.00"/>

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

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- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

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

- Yes
- No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

** I AGREE

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

Authorized Representative:

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

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:

* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

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

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

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

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

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

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
The City of Oklahoma City	

Application for Federal Assistance SF-424

* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): _____ * Other (Specify): _____
---	---	--

* 3. Date Received: _____	4. Applicant Identifier: _____
-------------------------------------	--

5a. Federal Entity Identifier: _____	5b. Federal Award Identifier: _____
--	---

State Use Only:

6. Date Received by State: _____	7. State Application Identifier: _____
---	---

8. APPLICANT INFORMATION:

* a. Legal Name: The City of Oklahoma City		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 736005359	* c. Organizational DUNS: 0141047770000	

d. Address:

* Street1:	420 W. Main St.
Street2:	Suite 920
* City:	Oklahoma City
County/Parish:	Oklahoma
* State:	OK: Oklahoma
Province:	
* Country:	USA: UNITED STATES
* Zip / Postal Code:	73102-4437

e. Organizational Unit:

Department Name: Planning Department	Division Name: Community Development Division
--	---

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

Prefix: _____	* First Name: Geoffrey
Middle Name: _____	
* Last Name: Butler	
Suffix: _____	
Title: Acting Planning Director	
Organizational Affiliation: The City of Oklahoma City	
* Telephone Number: (405) 297-2288	Fax Number: (405) 297-3796
* Email: Geoffrey.Butler@okc.gov	

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

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

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.241

CFDA Title:

Housing Opportunities for Persons With AIDS

*** 12. Funding Opportunity Number:**

* Title:

13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

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

Housing Opportunities for Persons With AIDS (HOPWA) Program activities.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

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

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="793,749.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="793,749.00"/>

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

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

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

Yes No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

** I AGREE

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

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:

* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

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

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

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2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
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5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
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18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	<input type="text" value="Mayor"/>
APPLICANT ORGANIZATION	DATE SUBMITTED
<input type="text" value="The City of Oklahoma City"/>	<input type="text"/>

CERTIFICATIONS

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

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

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

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

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

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

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

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

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

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.


Signature of Authorized Official

6-4-19
Date

Title : Mayor

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

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

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

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

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

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

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2018, 2019, and 2020 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

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

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

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

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

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

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

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

David Holt
Signature of Authorized Official

6-4-19
Date

Title : Mayor

OPTIONAL Community Development Block Grant Certification

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

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

David Holt
Signature of Authorized Official

6-4-19
Date

Title : Mayor

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

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

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

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

David Holt
Signature of Authorized Official

6-4-19
Date

Title: Mayor

Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

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

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

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

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

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

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

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

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

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

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

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

David Holt
Signature of Authorized Official

6-4-19
Date

Title: Mayor

Housing Opportunities for Persons With AIDS Certifications

The HOPWA grantee certifies that:

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

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

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



Signature of Authorized Official

6-4-19

Date

Title : Mayor

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

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

APPENDIX 7
CITY COUNCIL RESOLUTION

RESOLUTION

RESOLUTION APPROVING THE 2019-2020 CONSOLIDATED PLAN FIFTH ACTION YEAR PLAN, AND APPROVING NEW FORMULA GRANT FUNDING ALLOCATIONS FOR THE COMMUNITY DEVELOPMENT BLOCK GRANT \$4,869,051; THE HOME INVESTMENT PARTNERSHIPS PROGRAM \$2,214,939; EMERGENCY SOLUTIONS GRANT PROGRAM \$415,903; THE HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS \$793,749; AND PROVIDING FOR THE ALLOCATION OF 2018-19 COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM INCOME AND ESTIMATED PROGRAM FUNDS TO BE RECAPTURED FROM PRIOR YEAR OF APPROXIMATELY \$2,285,037 AND HOME INVESTMENT PARTNERSHIPS PROGRAM 2019-20 ESTIMATED PROGRAM INCOME AND PROGRAM FUNDS TO BE RECAPTURED IN THE AMOUNT OF \$530,000; APPROVING APPLICATION DOCUMENTS AND CERTIFICATIONS, U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD) GRANT AGREEMENTS AND OPERATING AGREEMENTS WITH SUB-GRANTEES, INCLUDED IN ATTACHMENT "A", INCLUDING THE COMMUNITY ACTION AGENCY, COMMUNITY HEALTH SERVICES, INC., OKLAHOMA CITY URBAN RENEWAL AUTHORITY, OKLAHOMA CITY HOUSING AUTHORITY, METROPOLITAN FAIR HOUSING COUNCIL, CENTRAL OKLAHOMA TRANSPORTATION AND PARKING AUTHORITY, AND THE OKLAHOMA CITY HOUSING SERVICES REDEVELOPMENT CORPORATION AND JEFFERSON PARKS NEIGHBORS ASSOCIATION OPERATING UNDER A JOINT VENTURE AGREEMENT; PROVIDING INTEREST EARNINGS ON UNEXPENDED SECTION 108 LOAN ACCOUNTS SHALL BE USED FOR DEBT SERVICE ON SECTION 108 LOANS; AND AUTHORIZING EXECUTION OF NECESSARY DOCUMENTS.

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

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

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

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

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

WHEREAS, FY 2019-20 will be the second year of a three-year averaging period to achieve the requirement to spend 70% of CDBG funds to benefit low/moderate income persons in the NRSA area; and

WHEREAS, the final FY 2019-20 formula grant allocations from HUD, have been announced and required federal public participation requirements have been adhered to;

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

1. The proposed 2019-20 Consolidated Plan Fifth Action Year Plan is adopted for the period July 1, 2019 through June 30, 2020.
2. The allocations of funds for the CDBG, HOME, ESG, and HOPWA programs, program income, and recaptured funds from prior years attached hereto and reflected in the Fifth Action Year Plan are approved.
3. The Mayor is authorized to execute the application documents, to make the required certifications, and to execute the HUD grant agreements.
4. The Mayor is authorized to execute operating agreements with sub-grantees to whom funds have been allocated in Attachment "A" that include the Community Action Agency, Community Health Services, Inc., Oklahoma City Urban Renewal Authority, Oklahoma City Housing Authority, Metropolitan Fair Housing Council and Central Oklahoma Transportation and Parking Authority.
5. The Mayor is authorized to sign Requests for Release of Funds forms which includes certification of environmental compliance required by 24 CFR Part 58 for projects that may be funded with HUD dollars.
6. The Mayor and/or his designee, the Housing and Community Development Division manager in The City of Oklahoma City Planning Department, is authorized to sign documents certifying that a project is in conformance with the Consolidated Plan.

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

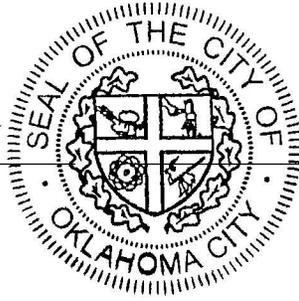
PROVIDED that the Mayor will not sign any agreement or contract pursuant to such awards that is not herein authorized without first securing the specific approval of the City Council.

ADOPTED by the Council and **APPROVED** by the Mayor of The City of Oklahoma City this 4th day of June, 2019.

ATTEST: [SEAL]

Travis Kersey

CITY CLERK



David Holt

MAYOR

REVIEWED FOR FORM AND LEGALITY

Paul Brunner

ASSISTANT MUNICIPAL COUNSELOR

**ATTACHMENT “A”
FUNDING RECOMMENDATIONS**

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)

Sources of Funds

Community Development Block Grant 2019-20	\$4,869,051
2018-19 Recaptured and Reprogrammed Funds and Program Income	\$2,285,038

Total Sources of CDBG Funds	\$7,154,089
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HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME)

Sources of Funds

Home Investment Partnerships Program 2019-20	\$2,214,939
2018-19 Recaptured and Reprogrammed funds	\$450,000
Estimated Program Income	\$80,000

Total Sources of HOME Funds	\$2,744,939
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EMERGENCY SOLUTIONS GRANT PROGRAM (ESG)

ESG funds allocated for 2019-20

HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS (HOPWA)

HOPWA funds allocated for 2019-20	\$793,749
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APPLICATIONS OF FUNDS

New Allocations for the 2019-20 Fifth Action Year are:	\$415,903
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CDBG:

Decent Housing

Oklahoma City Housing Assistance Program (to include the listed activities):	\$1,184,000
<ul style="list-style-type: none"> • Housing Exterior Maintenance Project Activity • Program Delivery Activity 	
Oklahoma City Housing Authority (OCHA)	\$234,897
OCHA-Inspection Program-Housing Service	\$50,000
Community Action Agency (CAA) Emergency Home Repair	\$590,847
Jefferson Park Neighbors/ Oklahoma City Redevelopment Corp joint venture	
- Walnut Development Project	\$350,000

Suitable Living Environment

Strong Neighborhoods Initiative	\$757,378
COTPA (Embark) Share-A-Fare	\$102,842
Community Action Agency Graffiti Removal	\$15,011
Oklahoma City Abandoned Housing	\$68,562
Community Health Services, Inc.-Healing Hands	\$60,000
Community Development Public Facilities Program	\$724,998

Economic Opportunity

Community Action Agency Small Business Services	\$39,149
OCURA Close-Out, Slum Blight, Acq. /Remediation	\$788,880
Unprogrammed	\$1,213,713

Administration

Metropolitan Fair Housing Council	\$82,745
Planning	\$60,000
Administration	\$831,065

TOTAL ALLOCATION OF CDBG FUNDS **\$7,154,089**

PRIOR YEAR CDBG PROJECTS/ACTIVITIES TO BE CARRIED FORWARD TO 2019-20 ALONG WITH ANY REMAINING FUNDS:

Oklahoma City Housing Assistance Program:

- Housing Exterior Maintenance

Community Action Agency Emergency Home Repair (*up to \$75,000 carried forward*)

Oklahoma City Housing Authority Inspection Program - Housing Service

OCURA Program Income funds from FY17-18 and FY18-19 (*not to exceed \$317,900*)

Kiwanis Early Childhood Education Facility

Metro Alliance First Step Public Facility Support for SRO

Strong Neighborhoods Initiative Program

Community Development Public Facilities Program -Unallocated

Section 108 Loan Repayment Contingency

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

Oklahoma City Housing Assistance Program:

- Whole House Rehab Project Activity
- Program Delivery Activity

Community Action Agency Emergency Home Repair (*amounts in excess of \$75,000 to be recaptured*)

Oklahoma City Abandoned Housing Program
Community Action Agency Graffiti Removal
STEAM Academy-Eugene Fields Elementary
Parks Summer Youth Project

Oklahoma City Housing Authority Public Housing Modernization
OCURA Housing Program-Sunbeam Project
OCURA Close-Out, Slum/Blight, Acq./Remediation
OKC Small Business CDRP Revolving Loan Fund
Metropolitan Fair Housing Council
Planning
Administration

HOME:

Down Payment Assistance Program (80% targeted to NRSA/20% non-targeted)	\$400,000
Oklahoma City Housing Assistance Program (40% targeted to SNI)	\$1,110,342
Affordable Housing Development Program	\$450,000
Community Housing Development Organization (CHDO) Set-aside	\$332,241
Planning and Administration	\$221,494
Unprogrammed plus Estimated Program Income	\$230,863
TOTAL ALLOCATION OF HOME FUNDS	\$2,744,939

PRIOR YEAR HOME PROJECTS/ACTIVITIES TO BE CARRIED FORWARD TO 2019-20 ALONG WITH ANY REMAINING FUNDS

Community Housing Development Organization Set-asides
Community Housing Development Organization Loan Pool funds
Down Payment Assistance Program (*up to \$235,000 to be carried forward with additional to be recaptured*).
Affordable Housing Development Program

- OCURA Culbertson houses Project Activity

Affordable Housing Development Program

- OKC Metro Alliance First Step SRO Project Activity

Affordable Housing Development Program-Unallocated funds
Oklahoma City Housing Assistance Program (*\$450,000 recaptured; with any remaining funds to be carried forward*).
Administration

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

Oklahoma City Housing Assistance Program

- Whole House Rehab Activity (*\$450,000 recaptured; with any remaining funds to be carried forward*).

Down Payment Assistance Program (*recapture any remaining funds exceeding \$235,000*).

Emergency Solutions Grant (ESG)

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

Total Allocation of ESG: \$415,903.00

Housing Opportunities for Persons with AIDS (HOPWA)

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

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

Total Estimated Allocation of HOPWA: \$793,749.00

Program Income

Program income for the 2019-20 Fifth Action Plan Year will be allocated as follows:

1. Program income generated from Section 108 Loan investment and repayment accounts will be used to pay Section 108 principal and interest.
2. If any funding rebates are provided by material suppliers resulting from Oklahoma City Housing Assistance Program CDBG activities, those funds will be allocated to the Oklahoma City Housing Assistance Program to assist with funding additional Housing Exterior Maintenance projects.
3. Subject to 20% regulatory caps, CDBG program income may be used to fund administrative expenses or create additional administrative capacity during the program year in which it is realized.

4. Program income that is generated by the Oklahoma City Urban Renewal Authority (OCURA) activities during the 2019-2020 program year *may be* reallocated back to OCURA for use in CDBG eligible activities.
5. In accordance with CPD Notice 97-9, III.J., HOME Program Income deposited to the City's letter of credit and that creates additional administrative capacity may be used by the City for HOME administrative expenses incurred during the Action Year, and any excess administrative capacity will be carried forward to subsequent years.
6. When practicable, CHDO funds may be reallocated between the CHDO loan pool and CHDO set-aside activities to ensure timely allocation and efficient use of these resources in the production of affordable units.

APPENDIX 8

ESG POLICIES AND PROCEDURES



Oklahoma City Continuum of Care

CoC/ESG

Written Standards

OVERVIEW

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

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

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

CONTINUUM OF CARE PURPOSE

The primary purpose of the Continuum of Care is to:

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

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

FUNDING AWARD PROCESS OVERVIEW

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

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

UNIVERSAL STANDARDS

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

PARTICIPANT ELIGIBILITY

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

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

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

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

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

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

COORDINATED INTAKE AND REFERRAL SYSTEM

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

EMERGENCY TRANSFER PLAN

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

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

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

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

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

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

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

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

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

HOUSING FIRST

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

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

HMIS

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

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

INCOME DETERMINATION

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

COORDINATION WITH MAINSTREAM AND TARGETED HOMELESS PROVIDERS

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

DISCHARGE PLANNING

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

EDUCATIONAL ASSURANCES

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

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

INVOLUNTARY FAMILY SEPERATION

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

TERMINATION OF ASSISTANCE

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

OCCUPANCY STANDARDS

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

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

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

LEAD-BASED PAINT

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

HOMELESS PARTICIPATION

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

FAITH-BASED ACTIVITIES

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

NON-DISCRIMINATION

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

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

PROGRAM INCOME

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

RECORDKEEPING

Program participant records shall include written:

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

Program policies and procedures shall indicate:

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

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

Financial records shall include:

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

CONFIDENTIALITY

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

PREVENTION AND RAPID RE-HOUSING STANDARDS

ELIGIBILITY

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

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

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

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

PRIORITY POPULATIONS

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

SERVICE TYPE, AMOUNT & DURATION

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

a) Financial Assistance:

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

b) Rental Assistance

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

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

PERMANENT SUPPORTIVE HOUSING STANDARDS

ELIGIBILITY

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

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

DOCUMENTS REQUIRED AT INTAKE

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

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

2. Homeless Status – Providers should make every effort to meet the federal standards of documentation. Providers should make every effort to receive 3rd party documentation. If 3rd party documentation is not available 2nd party documentation or observation by a homeless services provider is acceptable. At a minimum, client self-certification will be accepted with documentation of 3rd and 2nd party attempts. Records contained in HMIS or comparable database used by a victim service or legal service provider are acceptable evidence of 3rd party documentation.

3. Disability – Documentation of disability can include verification of disability benefits or a written signed statement from a qualified source. Written documentation should: (a) identify the physical mental or emotional impairment, why it is expected to be of long-continued or indefinite duration, how it impedes the individual’s ability to live independently, and how the individual’s ability to live independently could be improved by more suitable housing conditions; or (b) identifies a developmental disability; or (c) identifies AIDS or related conditions. Lack of disability documentation must not prevent an individual or family from being admitted to a permanent supportive housing program. Programs may enroll the person or family without such documentation, but documentation must be obtained within 45 days of date of intake. A copy of a disability check is adequate documentation. Permanent Supportive Housing providers can serve households in which either an adult, or a child, has a disability.

4. Chronically Homeless Status – Providers must gather evidence of length of homelessness or number of times an individual or family has been homeless. HMIS provides an official 3rd party record of homelessness that can be used for this purpose.

5. Income verification – Even though the program may not have an income requirement at entry documentation of the client’s income must be obtained from all sources if a client is responsible for paying a portion of the rent.

PRIOTIZATION FOR PSH BEDS DEDICATED OR PRIORTIZED FOR CHRONIC HOMELESSNESS

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

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

PRIOTIZATION FOR PSH BEDS NOT DEDICATED OR PRIORTIZED FOR CHRONIC HOMELESSNESS

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

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

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

PARTICIPANT CONTRIBUTION

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

TRANSITIONAL HOUSING STANDARDS

ELIGIBILITY

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

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

DOCUMENTS REQUIRED AT INTAKE

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

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

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

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

PRIORITY POPULATIONS

In providing transitional housing providers shall prioritize the following populations:

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

MINIMUM STANDARDS

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

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



Homeless Definition

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



Homeless Definition

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

Commonly Referred to Links

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

PROVIDER	RECOMMENDED FUNDING
HOMELESS ALLIANCE – JOURNEY HOME	\$50,000
HOMELESS ALLIANCE - CCM	\$85,000
UPWARD TRANSITIONS	\$38,000
BE THE CHANGE	\$50,000
RED ROCK	\$10,000
HEARTLINE	\$20,000
SUNBEAM	\$16,523
NSO	\$18,000
YWCA	\$30,000
LEGAL AID	\$18,000
HEALING HANDS	\$31,417

GRAND TOTAL

\$366,940

APPENDIX 9

AP-75 NARRATIVE RESPONSES (CONTINUATION)

Appendix 9 AP-75 Barriers to affordable housing – 91.220(j)

Introduction

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

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

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

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

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

- Adoption of the International Existing Building Code; This Code applies to multi-family housing and reduces financial barriers to renovating existing building by allowing greater flexibility in materials used in the renovation;
- The City has exempted impact fees for water and sewer in the core area of the city to reduce the cost of infill housing and other redevelopment efforts;
- The City has exempted the fees for permits to nonprofit builders of affordable housing;
- The City does not require engineering or architectural seals for nonprofit affordable housing developers; The rules and requirements for architectural seals are statutorily mandated by the Oklahoma State Architectural and Registered Interior Designers Act (59

Oklahoma Statutes, 2007, Section 46.1 et seq.). Specifically, Section 46.21b.C.5.e, f exempts from the provisions of the Act referenced above, residential structures no more than two (2) stories in height, including apartments containing no more than thirty-two (32) dwelling units or guest units per building. The City's building permit checklist includes an item for "Applicable Seals and Certifications" if required, prior to the issuance of a permit. Most assembly use buildings and larger buildings that involve spans of structural members in excess of 30 feet may be required to be designed by an Architect of Engineer licensed in the State of Oklahoma.

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

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

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

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

resources are being adequately utilized.

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

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

Discussion

The City of Oklahoma City remains committed to ensuring equal housing opportunity for all persons. Proposed Action Plan activities for the 2019-2020 Fifth Action Year Plan provide direct funding to the Metropolitan Fair Housing Council for the provision of fair housing training, compliance, and complaint processing functions. Staff will continue to participate in Fair Housing Seminars as part of Fair Housing Month activities, and will continue to monitor affordable housing barriers and provide resources where needed to ensure compliance.

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

In the last year Metro processed 468 potential Fair Housing complaints. The majority were filed based on discrimination due to disability. The second largest complaint category was familial status. Of all complaints, eleven (11) were filed with HUD's Office of Fair Housing & Equal Opportunity for Oklahoma City. In addition, MFHC collected \$801,350 in FY 2017 for Oklahoma City residents who contacted MFHC with complaints of unfair treatment by housing providers. This included \$800,000 from a sexual harassment lawsuit filed in federal court for seven (7) victims and \$1,350 in in-house mediations. These processes raise the awareness of Fair Housing Law.

In addition, MFHC conducted Fair Housing/Fair Lending/Renters Rights Seminars to 414 participants this year through 43 Fair Housing seminars and published 4 quarterly newsletters distributed to approximately two hundred (200) individuals, groups and private and public organizations in the City. City staff also participated in some of these outreach events. These activities speak directly to improving the understanding of and enhance attention to compliance with fair housing law. These important activities will continue in the upcoming year.

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

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