



Executive Summary

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

1. Introduction

The City of Oklahoma City (the City) is a federal Entitlement Community under the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant (CDBG) program. In conjunction with CDBG and HOME Investment Partnerships Act (HOME) Programs, the City is required to prepare a Consolidated Plan every five (5) years for submittal to HUD. The purpose of the Consolidated Plan is to provide an updated community-based analysis of current demographic, economic, and public policy trends, and a timely reassessment of the needs of low and moderate income populations relating to housing, shelter, public service, and economic development

opportunities. This analysis, along with input received during a comprehensive citizen and stakeholder consultation process, forms the foundation of the City's five (5) year strategic plan for addressing unmet community needs. Each year of the five (5) year strategy, the City is required to prepare an annual Action Plan to inform citizens and HUD of planned activities for the program year. Each Action Plan is due to HUD annually on or before May 15th. The Action Plan serves as the City's application for CDBG and HOME funds. At the end of each fiscal year, the City is required to present to HUD a Consolidated Annual Performance Evaluation Report (CAPER) that provides an assessment of annual performance in the context of the five (5) year Consolidated Plan and Annual Action Plan. The CAPER is due to HUD by October 1st of each year. Regulations governing the CDBG program require that each activity undertaken must meet one of the following three (3) National Objectives:

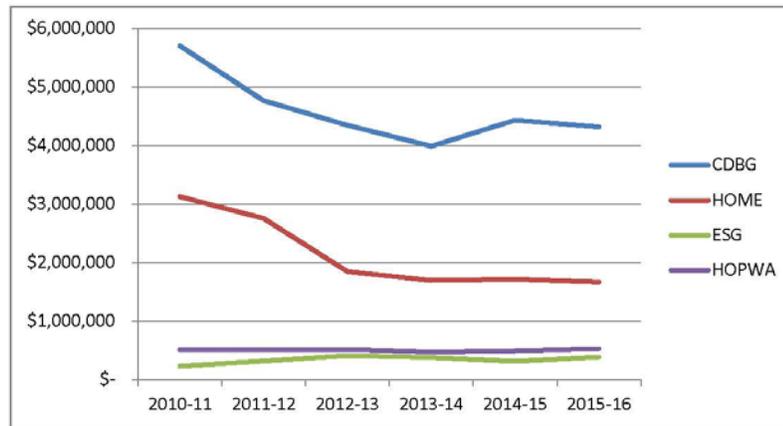
- Benefit people with low and moderate incomes
- Aid in the prevention or elimination of slums and blight
- Meet an urgent need (such as earthquake, flood, or tornado relief)

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

The Consolidated Plan details the City's strategy for meeting National Objectives and HOME program goals, as well as identifying proposed uses for ESG and HOPWA grant funds. Funding provided through HOME, CDBG, ESG, and HOPWA is crucial to the City's ability to meet community needs. The five (5) year Consolidated Plan prioritizes housing as a primary objective, specifically within the Neighborhood Revitalization Strategy Area (NRSA) and the Strong Neighborhoods Initiative (SNI) neighborhoods where 80% of available grant resources are targeted. The City concentrates resources strategically within the SNI neighborhoods to promote a holistic approach to neighborhood revitalization, rather than funding isolated stand-alone activities throughout the metropolitan area with nominal impact. Continued reductions in formula grant funds have increased the need for local subsidy and private investment to meet the needs of the community.

Annual Allocation Trends

Program	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16
CDBG	\$ 5,708,221	\$ 4,770,488	\$ 4,350,814	\$ 3,994,047	\$ 4,438,600	\$ 4,321,121
HOME	\$ 3,133,027	\$ 2,758,992	\$ 1,850,773	\$ 1,699,010	\$ 1,719,889	\$ 1,671,854
ESG	\$ 231,827	\$ 321,319	\$ 413,121	\$ 379,245	\$ 317,405	\$ 389,641
HOPWA	\$ 513,746	\$ 519,333	\$ 519,042	\$ 476,481	\$ 496,106	\$ 530,952



2010-2015 Annual Allocations

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The 2015-2019 Consolidated Plan contains an assessment of housing and community development needs, as well as those of homeless persons and special populations in Oklahoma City. Priority needs have been identified for the five (5) year Plan period, and are more particularly described in Table 51 in Section SP-25. These needs are summarized as follows:

Housing Related Priority Needs

- Quality of Affordable Housing
- Affordability of Owner-Occupied Housing
- Supply of Affordable Owner-Occupied Housing
- Supply of Affordable Rental Housing
- Quality of Public Housing
- Supportive Housing for the Chronically Homeless
- Sustainability of Transitional Housing
- Rapid Re-housing for Homeless Households with Children
- Housing Availability for Persons with HIV/AIDS

Non-Housing Priority Needs

- Services for Homeless Youth
- Increased Employment for Continuum of Care Participants
- Public Facilities, Services, and Infrastructure
- Strengthening Neighborhood Capacity
- Acquisition and Clearance of Vacant and Blighted Property
- Graffiti Removal
- Securing Vacant and Abandoned Buildings
- Providing Economic Opportunities for Low and Moderate Income Persons
- Transportation for Special Needs Populations
- Sustainability of Service Providers Facilities and Infrastructure
- Program Administration and Support

Priority needs were established through careful review of the data presented in the Needs Assessment and Market Analysis, input from public meetings, and consultation with local non-profits and service providers. Lower priority has been assigned to activities unrelated to crisis needs such as housing and homelessness prevention; however, ample opportunity exists for increased support of public services and facilities if additional resources become available. Annual Action Plan goals in Section AP-20 and the annual funded activities identified in Section AP-35 are relevant to the First Year Action Plan and will be evaluated each year as the Action Plan is developed. This Consolidated Plan may be amended from time

to time as the City responds to changing market needs, disasters, economic shifts, and community demographics to ensure the best use of limited resources.

3. Evaluation of past performance

During the 2010-2015 Strategic Plan period, the City of Oklahoma City experienced an expanding local economy and relatively strong housing market. Although still recovering from a national recession, Oklahoma City has not been impacted by volatility in the housing and job markets like similar sized communities in other parts of the country. Property values city-wide have remained relatively stable, and both residential and commercial construction activities have increased in recent years. This development, however, has not occurred uniformly across the city and many older neighborhoods continue to suffer from disinvestment, blight and declining property values.

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

The City of Oklahoma City has been successful in attaining the goals and objectives contained in the 2010-15 Consolidated Plan and annual Action Year strategies. The activities undertaken addressed the overall program goals of the formula grant programs that include providing decent housing and suitable living environment, and expanding economic opportunities principally for persons of low and moderate income.

The City's 2010-15 Consolidated Plan called for achieving housing goals by providing funding and engaging in program activities that included support for nonprofit and for-profit housing developers to rehabilitate and construct new affordable housing; support for Community Housing Development Organizations to rehabilitate and construct new affordable housing; support for the Oklahoma City Housing Authority to modernize public housing units; funding to assist with emergency repairs of housing for low-income households; support for down payment and closing cost assistance to expand homeownership opportunities for low-income households; and, funding for activities that support the City's housing rehab program, and housing and services for persons with HIV/AIDS.

The goal of providing a suitable living environment was addressed in the prior Consolidated Plan and Action Year strategies by continuing ongoing programs that addressed specific community needs. The 2014-15 Action Year strategy called for the continued support for homeless services through the Emergency Solutions Grant Program; the Continuum of Care Program; discounted taxi coupons for elderly, disabled and sight impaired persons under the City's Share-A-Fare program; bus passes and discounted taxi service for homeless individuals and families; local funding of capacity building activities

for neighborhood organizations and CDBG funding to provide neighborhood improvements; activities to address vacant and abandoned housing; removal of graffiti; and, removal of slum and blight conditions in low-income areas.

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

4. Summary of citizen participation process and consultation process

The principal goal of the Citizen Participation Plan is to provide for and encourage citizen participation, with particular emphasis on persons of low/moderate income who reside in slum/blighted areas; areas in which funds are proposed for use; and low/moderate income neighborhoods as defined by the City. 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 HCDA, etc., as amended;
2. To provide technical assistance to groups representing persons of low/moderate income in developing proposals for applicable funding opportunities;
3. To provide for public meetings and public hearings to obtain citizen views and to respond to proposals/questions at all stages of the community development process. This includes the identification of needs, development and review of proposed activities, and evaluation of program performance. Hearings are held after adequate notice, at times and locations convenient to potential or actual beneficiaries, and with accommodation for minorities and non-English speaking persons, as well as persons with mobility, visual or hearing impairments in all stages of the process;
4. To encourage participation of residents of public and assisted housing developments, and residents of targeted revitalization areas;
5. To consult with, and provide information to housing agencies about Consolidated Plan activities that may relate to developments and surrounding communities within their jurisdiction for use in formulating their required housing agency plans;
6. To provide written responses to formal complaints and grievances, within fifteen (15) working days where practicable, and;
7. To publish a synopsis of the draft Consolidated Plan, and provide citizens the opportunity to inspect the full draft document on the City's website or at the City of Oklahoma City Planning Department, Community Development Division-420 W. Main Street, Suite 920, Oklahoma City, OK within a thirty (30) day comment period prior to the final public hearing and adoption of the

Consolidated Plan. A record of public comments received will be maintained and will be submitted with the Consolidated Plan indicating responses to all comments;

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

A timeline of the citizen participation process and a summary of community input are attached to this report, and discussed in detail in Section PR-15. Consultation with outside agencies and other municipalities is discussed in Section PR-10.

5. Summary of public comments

The public participation process for the completion of the 2015-2020 Consolidated Plan began in October 2014 with the publication of a Notice of Public Meetings for four (4) community input sessions held in various areas of the City on November 4, 12, 13 and 14, 2014. Meetings were held in public facilities, with one meeting held during the afternoon to accommodate persons working evening hours. A total of fifty-three (53) citizens and representatives of local organizations and service providers attended these meetings. Citizen input touched on many different topics which are itemized in the attached appendix; the most common were fears of gentrification, disenfranchisement of minority neighborhoods, and the need for additional resources to address the needs of domestic violence victims and homeless youth.

Additional opportunities for community input were provided at the Citizens Committee for Community Development meetings on December 16, 2014 and February 17, 2015. Final recommendations were presented by Staff to the Neighborhood Conservation Committee (NCC) of City Council on March 3, 2015. A thirty (30) day Notice seeking public comment on the proposed Consolidated Plan and First Year Action Plan was published in *The Oklahoman* on March 27, 2015. A final opportunity for input was provided in a public hearing before City Council on April 28, 2015 at the time of Plan approval.

The Oklahoma City Housing Authority, Community Action Agency, YWCA and the Association of Central Oklahoma Governments were consulted by City Staff throughout the preparation of the Consolidated Plan 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.

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

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

All public feedback was given due consideration, although not every requested activity could be funded. Some comments were in direct opposition with one another, requiring either substantial compromise between two worthy alternatives, or rejection of a viewpoint not in conformance with the larger majority. Other suggestions were non-compliant with program regulations and strategic goals. For example, multiple comments were received about the need for investment in neighborhoods other than NRSA and SNI target areas; however, the City has committed 80% of available resources to those neighborhoods with support from the City Council to ensure a holistic and sustainable approach to revitalization. The need for greater community investment is apparent; however, resources (both monetarily and administratively) are insufficient to enlarge the targeted neighborhood boundaries at the present time.

An increased need for programs to address domestic violence was also a common theme. The City met with local agencies and stakeholders to discuss their concerns in detail. Although funding is not immediately available, interested parties were advised to focus on developing programmatic structures and encouraged to apply for funding in response to future solicitations.

7. Summary

Oklahoma City's strategic mission for community development is to provide for ongoing community revitalization by leveraging Federal and local resources with private investment and non-federal sources to ensure the provision of decent housing, suitable living environment and expanded economic opportunity for all residents of the community. In addition to the City's formula grant activities, local efforts have been undertaken to ensure economic momentum. The citizens of Oklahoma City passed a third Metropolitan Area Projects (MAPS) tax referendum estimated at \$777 million which was implemented in April 2010 and continues through April 2017. This third initiative provides for a new convention center, a downtown regional (Core to Shore) park, a 4.5 mile rail based streetcar system, a new exposition center at the state fairgrounds, and creation of a community trails network. It is anticipated that most, if not all, of these projects will be completed during the 2015-2020 time frame covered by this Consolidated Plan. Substantial private investment is also planned and underway, and is discussed in more detail in Section MA-45.

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

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

The Process

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

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

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

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

Table 1 – Responsible Agencies

Narrative

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

Consolidated Plan Public Contact Information

For questions and comments regarding this Plan, please contact Chris Varga, Community Development Manager, City of Oklahoma City, 420 W. Main Street, Ste. 920, Oklahoma City, OK 73102 (405)297-1639.

PR-10 Consultation - 91.100, 91.200(b), 91.215(I)

1. Introduction

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

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

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

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

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

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

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

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

While the City has permanent housing programs that focus on homeless families, the most extensive services to that population have been provided via the Emergency Solutions Grant through prevention and re-housing assistance. The services that ESG provides are the ones most often required by homeless families as few have the extensive needs that make supportive housing a necessity. ESG funds are typically the vehicle used to address the needs of those at risk of homelessness. If an individual or family demonstrates that they are at imminent risk of being homeless, ESG agencies can help address the issues leading to that situation and provide case management to avoid it.

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

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

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

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

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

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

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

The Oklahoma City Emergency Medical Services Authority (EMSA) hired a HOPWA consultant (Center for Urban Community Services) in 2007 to conduct an area-wide Needs Assessment. The Assessment was completed in 2008 and provides the basis for CoC funding decisions. The study remains relevant in 2015 and has been instrumental in developing an overall strategy to direct funding to those individuals and families with the greatest need. The Continuum of Care lead agency meets with the Oklahoma AIDS Care Fund and the HIV Networking Group monthly to determine progress and develop strategies for addressing the underserved needs of persons and families with HIV/AIDS.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Metropolitan Fair Housing Council
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Fair Housing Enforcement
	How was the Agency/Group/Organization consulted and 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?	Housing Need Assessment Public Housing Needs Homelessness Needs - Veterans Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Oklahoma City Housing Authority was consulted directly by City Staff to gauge current needs for public housing and Section 8 tenants. Information was provided by OCHA about current inventories, waiting lists, capital needs, veterans' benefits, anticipated funding over the next five (5) years, and anticipated gaps in resources. The City of Oklahoma City continues to provide CDBG funding to support the rehabilitation of fifteen (15) public housing units annually 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?	Economic Development Market Analysis

	How was the Agency/Group/Organization consulted and 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 this Consolidated Plan and the first year Action Plan funding allocations. They are supportive of the City's recommendations.
4	Agency/Group/Organization	COMMUNITY ACTION AGENCY OF OKLAHOMA/CANADIAN COUNTIES
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Substance Abuse & Addiction Recovery
	What section of the Plan was addressed by Consultation?	Homelessness Needs - Veterans Non-Homeless Special Needs Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Community Action Agency (CAA) was consulted for the homeless needs assessment and identification of social services gaps. CAA provides child development services, treatment for substance abuse, economic development loans for small businesses, homebuyer assistance, and emergency repair/weatherization activities for homeowners. CAA is provided with CDBG funding to support emergency home repairs, graffiti removal, and small business services.
5	Agency/Group/Organization	YWCA
	Agency/Group/Organization Type	Services-Children Services-Victims of Domestic Violence Services - Victims Services-Sexual Assault
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Non-Homeless Special Needs

<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>City Community Development Staff met with the Community Resource Liaison from the YWCA and the Programs Manager from the State of Oklahoma Attorney General's office on November 25, 2014 to discuss potential funding options for victims of domestic violence; specifically, the City's ability to partner in providing emergency shelter, relocation assistance, utility and rent deposits, and transitional housing for victims of domestic violence. Staff advised that ESG funds would be the most appropriate resource and discussed the application process and timeline. The agency was advised to begin developing a programmatic structure and determining eligibility criteria to present a competitive application once the funding cycle begins. The agency was also advised to contact the Oklahoma State Department of Commerce to inquire about ESG funds that may be available at the state level.</p>
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Identify any Agency Types not consulted and provide rationale for not consulting

The City of Oklahoma City consulted with all relevant agencies and municipalities, and provided an opportunity to comment and provide feedback on Plan priorities.

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.
PlanOKC	The City of Oklahoma City	The City of Oklahoma City is nearing completion of a new comprehensive plan (PlanOKC) that will inform all City planning strategies for the foreseeable future. Although PlanOKC has not been formally adopted at the time of Plan submission, it is nearing completion and is anticipated to impact all funding priorities in the final four (4) years of this Consolidated Plan.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Comprehensive ED Strategy Central OK	Association of Central OK Governments	The CEDS is a long range regional plan that analyzes the challenges and opportunities related to economic and community development in the Central Oklahoma region. The City of Oklahoma City collaborates with ACOG to achieve economic development objectives and enhance the regional appeal of the metropolitan area to attract new business and industry.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

Consolidated Plan priority needs, goals and action steps have been provided to the Oklahoma State Department of Commerce (Administers CDBG for State of Oklahoma), adjacent communities (including the City of Midwest City, City of Edmond, City of Norman, and City of Moore), the Oklahoma City Housing Authority (OCHA), Community Action Agency (CAA), and the Association of Central Oklahoma Governments (metropolitan planning agency) for their input with regard to non-housing community development needs and other extra territorial issues that include transportation, workforce development, economic development and the environment. The responses received have been used to inform Plan priorities and proposed funding allocations.

Narrative (optional):

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

Four (4) public meetings were held in November 2014 in different quadrants of the City. Attendance at these meetings by local service providers and neighborhood associations included representatives from College Hill Neighborhood Association, YWCA, Community Action Agency, It's My Community Initiative, Neighborhood Alliance, Metro Better Living, JFK Neighborhood Association, Redrock Estates HOA, Ron Walters Homes, Cashion-Wildwood Neighborhood Association, Classen Ten-Penn Neighborhood Association, Boys & Girls Club-Oklahoma County, City Care, Reaching Our City, Rebuilding Together OKC, Oklahoma City After school Network, and Legal Aid. Comments and input received during these public meetings are provided in the appendices of this report.

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

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.

PR-15 Citizen Participation

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 October 21, 2014. In addition, local stakeholders, non-profit organizations and other interested parties were notified via email on October 30, 2014. Meetings were held in various public facilities between November 4th and November 14th, 2014 at the following locations:

Springlake Police Patrol Division, 4116 N Prospect Ave- Tuesday, November 4, 2014 6:30 PM

Edgemere Elementary School, 3200 N Walker Ave- Wednesday, November 12, 2014 6:30 PM

Santa Fe Police Patrol Division, 9000 S Santa Fe Ave- Thursday, November 13, 2014 6:30 PM

Will Rogers Exhibition Center, 3400 NW 36th St- Friday, November 14, 2014 2:30 PM

The citizen participation process and summary of feedback has been fully described in item no. 5 of the Executive Summary. Feedback received at the public meetings was used in conjunction with quantitative data and current demographics to establish priority needs for this Consolidated Plan. Where possible, funding allocations and strategic goals were identified based upon the most urgent community needs. Staff will evaluate needs on an ongoing basis. Funding allocations in each Annual Action Plan will be adjusted as needed to promote a strategic and targeted allocation of resources, with the hope of creating a noticeable and sustainable community benefit.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	Four (4) public meetings were held in various public facilities in all quadrants of the City. The Springlake meeting held on November 4, 2015 was attended by 16 citizens and 6 staff members. The Edgemere meeting held on November 12, 2015 was attended by 10 citizens and 8 staff members. The Santa Fe meeting held on November 13 was attended by 8 citizens and 6 staff members. the Will Rogers meeting held on November 14 was attended by 19 citizens and 7 staff members.	Multiple pages. Attached in appendices.	All comments and suggestions were given due consideration in the allocation process.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Newspaper Ad	Non-targeted/broad community	A thirty (30) day comment period Notice of public hearing was submitted to Oklahoma Publishing Company (OPUBCO) for publication on March 24, 2015 and printed on March 27th in the legal notices.	No additional comments were received in response to the published request for public comment about proposed activities.	Not Applicable	
3	Public Hearing	Non-targeted/broad community	Public hearing before City Council April 28, 2015.	No additional public comment was received during the public hearing before City Council.	Not Applicable	

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The Housing Needs section consists of two parts: the estimated housing needs projected for the next five (5) years and an assessment of racial disparities. The most recent (2007-2011) Comprehensive Housing Affordability Strategy (CHAS) data series was the primary source of data used. U.S. Census and American Community Survey data were also used to inform the Needs Assessment section of the Consolidated Plan. Consultation with the Oklahoma City Housing Authority and local service providers were also considered in the final analysis.

The Consolidated Plan Needs Assessment examines the City of Oklahoma City's community-wide needs for housing and community development activities. The empirical data and evaluation of existing plan documents were supplemented with feedback and suggestions received during an extensive public participation process. Public forums were held to receive input from residents, neighborhood associations, and local community organizations. The City also consulted with community stakeholders and service providers to gauge their perception of funding gaps, unmet service needs, and opportunities for public-private partnerships. Upon completion of the public input process, all information received was compiled and analyzed for identification of strategic goals and funding objectives, and prioritized as a high or low priority.

The Needs Assessment section of the Consolidated Plan focuses on evaluating the needs of the following income groups based on Area Median Income (AMI):

- Extremely Low Income (0-30% AMI)
- Very Low Income (30-50% AMI)
- Low Income (50-80% AMI)

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

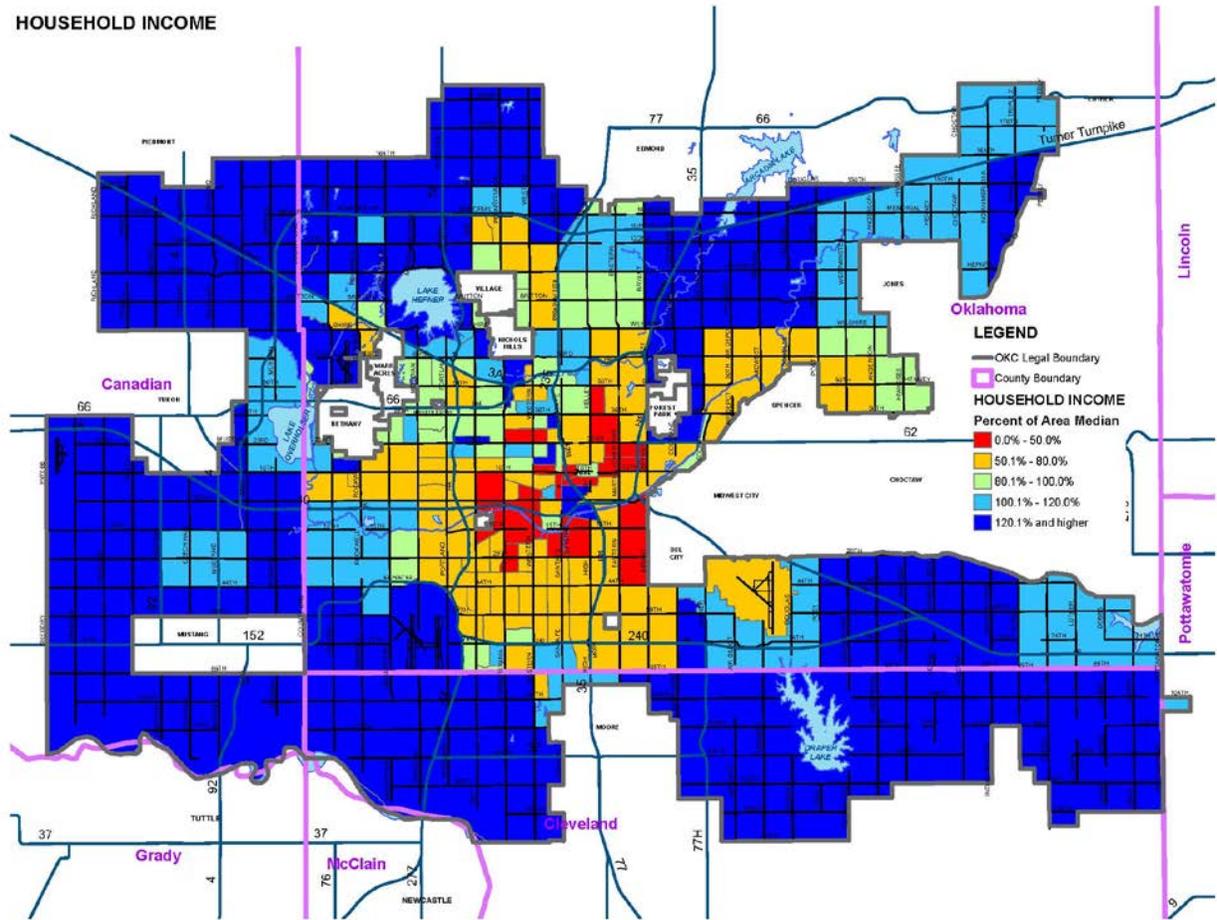
The following data shows that a significant percentage of households (both renters and homeowners) earning less than 30% of the Area Median Income (AMI) suffer from housing problems. The Small Related category (2-4 family members) has the highest percentage of all households. Overcrowding is also considered within this category and the data shows that within all households earning less than 80% AMI, overcrowding is a concern. The data reflects that 38.5% of homeowners and 35.2% of renters in the 50-80% AMI bracket live in severely overcrowded conditions (more than 1.51 persons per room). According to the data, 67% of renter households and 37% of owner households earning less than 30% AMI, are experiencing 1 or more of 4 housing problems, which may include the lack of a kitchen or complete plumbing, severe overcrowding and/or severe cost burden. Among renters, Households earning between 30-50% median income carry the highest percentage of households (45%) with a cost burden exceeding 30%. For homeowners, cost burden exceeding 30% is the greatest for households in the 50-80% bracket (42%). Over 90% of rental households and 83% of homeowners earning less than 80% of median income and experiencing at least one housing problem are living in substandard housing conditions.

Demographics	Base Year: 2000	Most Recent Year: 2011	% Change
Population	506,132	572,742	13%
Households	204,493	224,986	10%
Median Income	\$34,947.00	\$44,973.00	29%

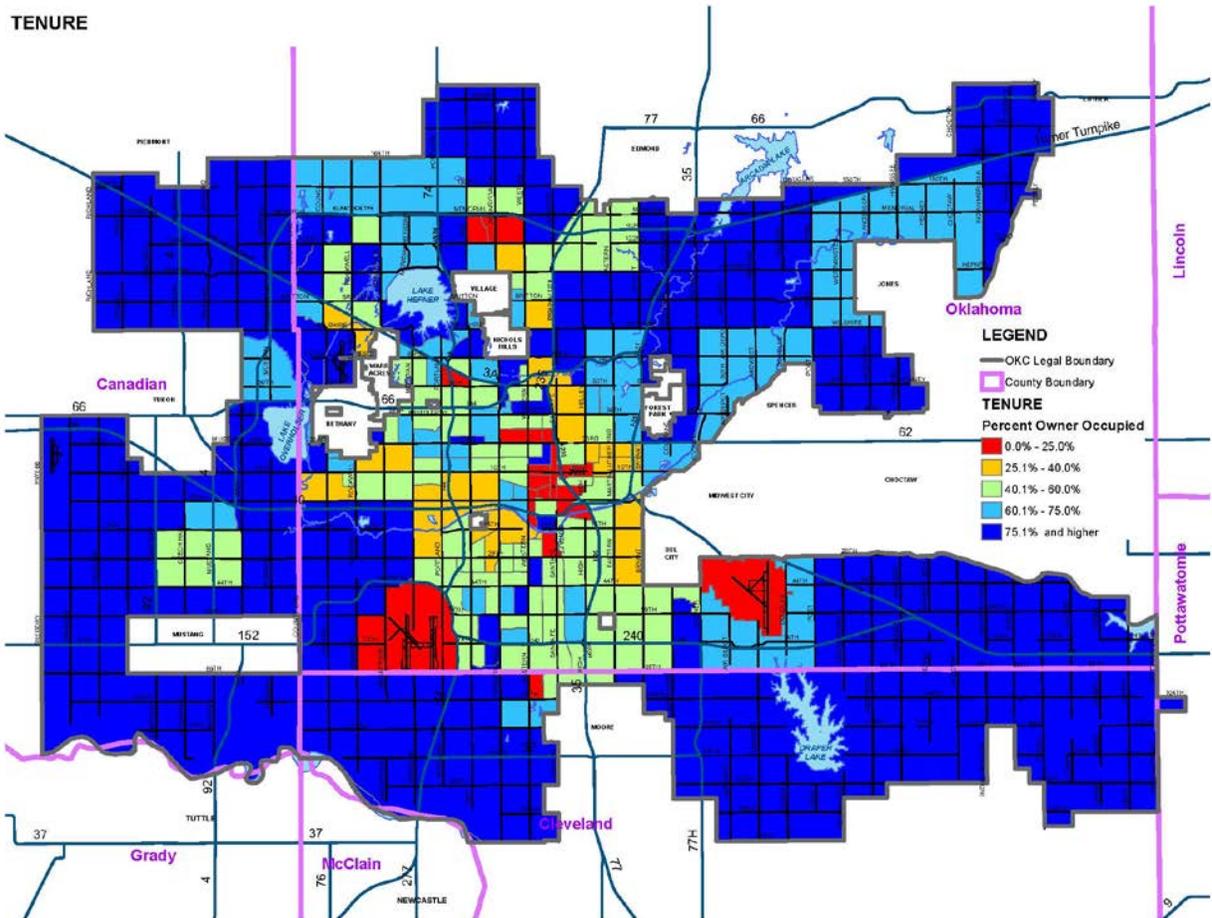
Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2007-2011 ACS (Most Recent Year)

HOUSEHOLD INCOME



Household Income Concentration



Owner-Occupied Housing Rates

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	30,315	26,775	41,215	23,165	103,525
Small Family Households *	10,890	9,385	15,170	9,405	54,075
Large Family Households *	2,350	2,770	3,705	2,195	7,780
Household contains at least one person 62-74 years of age	3,285	4,300	6,350	3,895	17,875
Household contains at least one person age 75 or older	2,635	3,719	4,680	2,545	7,424
Households with one or more children 6 years old or younger *	7,920	6,234	8,134	4,294	11,809
* the highest income category for these family types is >80% HAMFI					

Table 6 - Total Households Table

Data Source: 2007-2011 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	405	275	473	125	1,278	74	155	155	80	464
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	200	240	290	95	825	60	65	94	25	244
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	970	790	635	255	2,650	95	375	410	300	1,180
Housing cost burden greater than 50% of income (and none of the above problems)	14,440	3,870	620	214	19,144	3,960	2,765	2,270	525	9,520
Housing cost burden greater than 30% of income (and none of the above problems)	2,310	7,630	6,400	580	16,920	1,370	3,184	5,670	3,355	13,579
Zero/negative Income (and none of the above problems)	2,060	0	0	0	2,060	715	0	0	0	715

Table 7 – Housing Problems Table

Data 2007-2011 CHAS
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	16,010	5,175	2,010	690	23,885	4,190	3,360	2,930	930	11,410
Having none of four housing problems	4,810	10,920	18,740	8,180	42,650	2,535	7,325	17,525	13,365	40,750
Household has negative income, but none of the other housing problems	2,060	0	0	0	2,060	715	0	0	0	715

Table 8 – Housing Problems 2

Data 2007-2011 CHAS
Source:

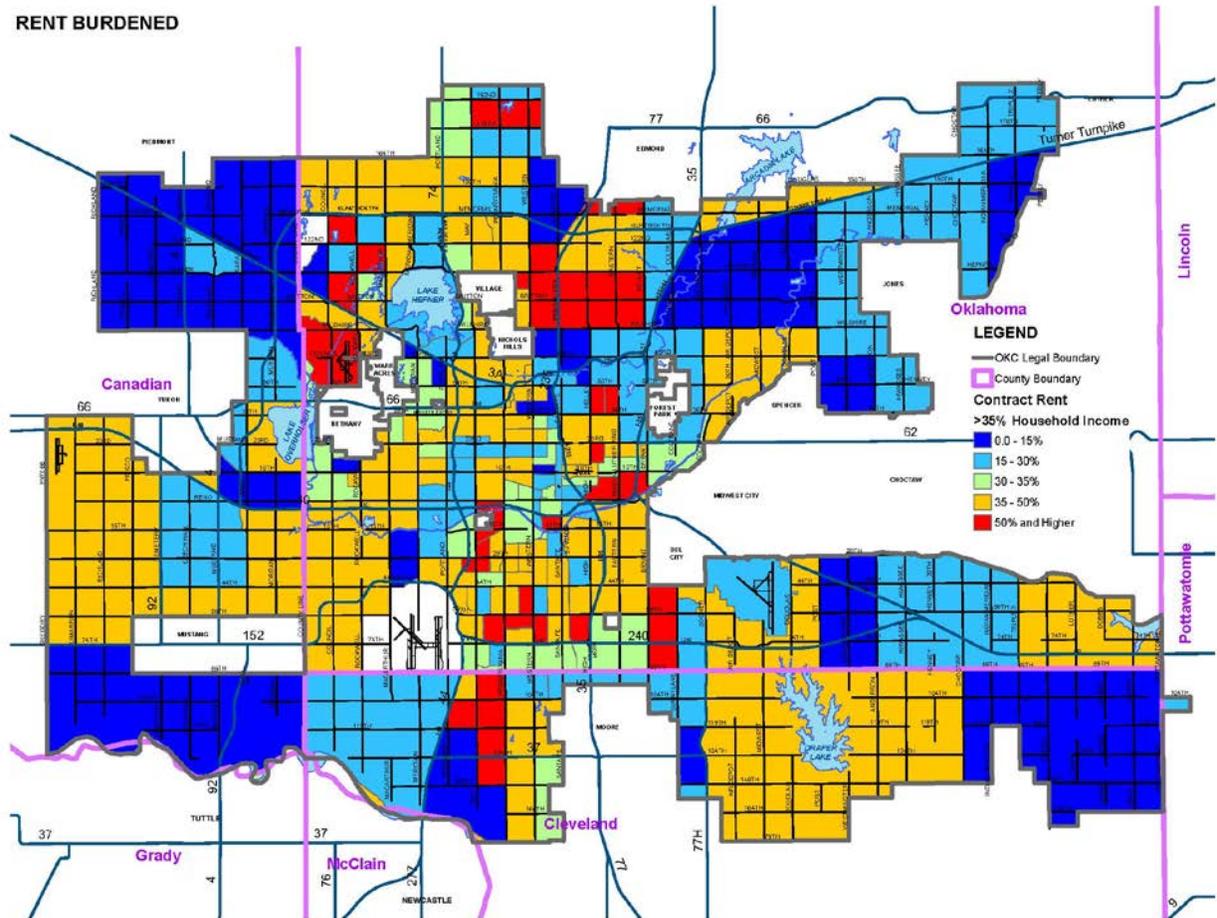
3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	7,350	4,990	2,645	14,985	1,455	2,095	3,684	7,234
Large Related	1,640	1,005	320	2,965	415	734	620	1,769
Elderly	1,850	1,879	1,278	5,007	2,219	2,225	1,877	6,321
Other	7,275	4,235	3,150	14,660	1,385	1,189	1,845	4,419
Total need by income	18,115	12,109	7,393	37,617	5,474	6,243	8,026	19,743

Table 9 – Cost Burden > 30%

Data 2007-2011 CHAS
Source:

RENT BURDENED



Rent Burdened Households

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	6,375	1,380	105	7,860	1,280	1,005	925	3,210
Large Related	1,315	265	0	1,580	340	234	110	684
Elderly	1,495	949	424	2,868	1,394	895	663	2,952
Other	6,310	1,375	225	7,910	1,045	755	570	2,370
Total need by income	15,495	3,969	754	20,218	4,059	2,889	2,268	9,216

Table 10 – Cost Burden > 50%

Data 2007-2011 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	1,135	855	720	240	2,950	155	375	344	234	1,108
Multiple, unrelated family households	40	120	170	110	440	0	85	165	84	334
Other, non-family households	0	80	55	10	145	0	10	0	0	10
Total need by income	1,175	1,055	945	360	3,535	155	470	509	318	1,452

Table 11 – Crowding Information – 1/2

Data Source: 2007-2011 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Alternate Data Source Name: 2013 ACS Survey Households and Families

Table 12 failed to pre-populate data for households with children, by income and ownership status. The 2013 ACS 1-year Estimates for Households and Families (report no. S1101) provides significant data, including households with children by age demographics. The data reflects that 28% of total households have children present in the home. Household income of the families is unknown and there does not appear to be an alternate data source that provides the data in the format requested in the table (i.e. Households with children by household income and rental/homeownership status). It can be presumed that monthly housing costs and household income are comparable to that of households without children; however, it remains unclear whether an overcrowding issue exists as the number of bedrooms for each occupant is not available in the dataset.

Data Source Comments:

Describe the number and type of single person households in need of housing assistance.

The American Community Survey 2013 1-Year Estimates for Households and Families indicates that non-family households account for 38.6% of the total population. Of this amount, 83.4% are identified as "Householder living alone". The net result is 74,693 persons, or 32.2% of the total population (232,102) that can be identified as single person households. Median household income for all households in Oklahoma City according to the ACS 1-Year Estimates is \$46,232 as opposed to only \$32,073 for non-family households. The maximum HOME program income limits in 2014 for a one (1) person household

is \$34,400 for low income families (80% AMI) and \$25,800 for households at the 60% AMI level. This would indicate that most single family households will have a housing costs burden exceeding 30% of monthly income. As a result, it can be anticipated that additional affordable and public housing units will be required to meet the needs of this population.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

The total number of cases of those seeking housing assistance due to domestic violence had been increasing in Oklahoma City annually until 2012. Since that time though, the number of cases has fluctuated between approximately 150 and 200 per year. These numbers reflect active cases only. The actual number of domestic violence victims is difficult to ascertain due to the inability and/or unwillingness of victims to seek the necessary help and resources. According to the 2014 Point-in-Time (PIT) Survey, there were 181 people identified as homeless due to domestic violence. This is an increase from 168 the previous year but down from 202 in 2012.

The victim service provider that the Oklahoma City CoC has partnered with to address this issue is the Young Women's Christian Association (YWCA). The YWCA is networked at the state/local level and licensed to provide services to persons that are victims of domestic violence. Program oversight and funding for services are provided through the Oklahoma Attorney General's office. The YWCA provides the only certified shelter for battered women and their children in Oklahoma County. Between 1998 and 2010, 1,059 victims were lost to domestic violence statewide. It is estimated that 33% of all police time is spent responding to domestic disturbance calls. Between 30-60% of children in domestic violence situations are abused. Approximately 60% of men who abuse their spouses also abuse the children. Nearly 1/3 of domestic violence homicides are witnessed by children. Youth who witness domestic violence are at increased risk for suicide and substance abuse, and many repeat the learned pattern of violence in their adult relationships.

The City of Oklahoma City works closely with the YWCA to provide supportive services to victims of domestic violence. Currently, the YWCA operates a shelter for women fleeing domestic violence as well as transitional housing and they are working with the Attorney General's office to explore options for permanent supportive housing. Additionally, the YWCA also works to provide supportive services such as skill training for jobs, referrals to mental health services and education to keep the victim and family safe.

What are the most common housing problems?

Substandard housing continues to be problematic, especially for renters in the lowest income brackets. Overcrowding for households earning less than 50% of median income is a concern, even when no other substandard housing problems exist. Housing costs burden greater than 50% is extremely high for rental households earning less than 30% AMI (75.4%). On the homeownership side, 51% of Small Related households earning between 50-80% AMI have a cost burden exceeding 30%. Apart from the data

presented, vacant and abandoned buildings in urban neighborhoods continue to devalue surrounding property and create concerns about citizen safety and increased taxpayer expense for emergency response.

In the last five years, families with children have become the fastest growing sub-population of homeless. Oklahoma City has focused efforts through ESG and the short-term HPRP funding (now ended) with the intention of decreasing the number of families with children that enter shelters. The most recent PIT count indicates that the number of families with children in shelters has decreased 20%. When taking into account the recent downturn in the economy, rising unemployment and the increase in the number of foreclosures, the efforts made through the targeted initiatives have had a significant positive impact on this population.

Are any populations/household types more affected than others by these problems?

As can be expected, those households at and below 30% AMI experience overcrowding, substandard housing conditions, and very high housing costs burden in excess of 50% at a much higher rate than other income demographics. This is especially true for renters. Homeowners tend to experience these issues more frequently when earning between 50-80% AMI. This differential can be primarily attributed to the inability of households below the 80% income level to qualify for mortgage financing, resulting in an inability to achieve homeownership.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Individuals and families that are currently housed but are at risk of losing that housing most often need the type of assistance that the Emergency Solutions Grant (ESG) program provides. Being behind on rent or utility payments is often the cause of evictions. These individuals may initially need to be connected with that type of assistance in order to stabilize. Both families in need of rapid re-housing assistance, and those who have assistance that is terminating, need a source of revenue and often assistance with other issues. All ESG recipients work with a case manager who works to connect them with employment or other mainstream sources of income, as well as help them address other issues in their lives that may be jeopardizing their housing.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

"At-risk population" is defined as individuals and families who are currently housed, but are at risk of becoming homeless without immediate financial assistance. Estimates are generated from requests made for ESG assistance, consultation with service providers and recipients of HOPWA Tenant Based Rental Assistance and Short Term Rent, Mortgage and Utility Assistance.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

The rental market in Oklahoma is at very low capacity overall, and particularly for individuals with low incomes. Individuals and families living in some of the most cost efficient units often find they are no longer able to afford them as housing demand increases leading to rising rents. The inability to make rental security deposits and utility deposits is often a barrier to those households who are being evicted or are attempting to locate a cheaper housing option. Short term assistance is often the difference between maintaining shelter and avoiding homelessness.

Discussion

The prevention of homelessness and rapid re-housing remain high priorities in this Strategic Plan. The Continuum of Care and local service providers continue to look for new ways to stretch limited resources. The City and local service agencies continue to emphasize and employ the Housing First model to address immediate housing needs.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

An analysis of the 2007-2011 Comprehensive Housing Affordability Strategy (CHAS) tables for the Oklahoma City area as reflected below show disproportionately greater need for persons experiencing **housing problems** among five (5) different minorities and ethnicities, and within various income demographics. The four housing problems included in the data analysis include lack of complete kitchen facilities, lack of complete plumbing facilities, more than one person per room, and housing **cost burden greater than 30%**. A "disproportionately greater need" exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10% or more) than the income level as a whole.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	24,545	4,020	2,325
White	11,745	2,230	1,235
Black / African American	6,840	950	485
Asian	660	35	120
American Indian, Alaska Native	724	90	120
Pacific Islander	0	0	0
Hispanic	3,420	390	230

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2007-2011 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	18,255	8,715	0
White	8,935	5,485	0
Black / African American	3,869	1,070	0
Asian	430	120	0
American Indian, Alaska Native	515	275	0
Pacific Islander	35	0	0
Hispanic	3,505	1,525	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2007-2011 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	15,445	26,150	0
White	9,670	15,835	0
Black / African American	2,365	4,000	0
Asian	595	1,190	0
American Indian, Alaska Native	220	480	0
Pacific Islander	0	40	0
Hispanic	1,795	3,745	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2007-2011 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	5,395	18,305	0
White	3,680	12,530	0
Black / African American	585	2,250	0
Asian	295	630	0
American Indian, Alaska Native	159	494	0
Pacific Islander	0	0	0
Hispanic	595	1,919	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2007-2011 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

In the 0-30% AMI bracket, no disproportionate needs related to housing problems have been identified among different ethnicities. The greatest disparate need is represented by the Asian population of which 95% report one (1) or more of the four (4) housing problems noted in the introduction section above. The percentage of households city-wide that report one (1) or more of the four (4) housing problems is 86%. For those households earning between 30-50% AMI, disproportionate needs exists for Black/African American, Asian, and Pacific Islander households. Black families have 10.6% greater housing problems than the general populace as a whole, followed by Asian households at 10.5%. Pacific Islanders have a 32.3% greater need; however, the smaller sampling size (.013% of the total persons in this income bracket) makes comparative analysis more difficult. No disproportionate needs have been identified in the 80-100% AMI category and each ethnic minority group experiences housing problems in a similar manner as the general population.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

An analysis of the 2007-2011 Comprehensive Housing Affordability Strategy (CHAS) tables for the Oklahoma City area as reflected below show disproportionately greater need for persons experiencing **severe housing problems** among five (5) different minorities and ethnicities, and within various income demographics. The four housing problems included in the data analysis include lack of complete kitchen facilities, lack of complete plumbing facilities, more than one person per room, and housing cost burden **greater than 50%**. A "disproportionately greater need" exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10% or more) than the income level as a whole.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	20,320	8,245	2,325
White	9,610	4,365	1,235
Black / African American	5,770	2,025	485
Asian	584	104	120
American Indian, Alaska Native	564	260	120
Pacific Islander	0	0	0
Hispanic	2,850	965	230

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2007-2011 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	7,545	19,410	0
White	3,595	10,825	0
Black / African American	1,699	3,240	0
Asian	210	345	0
American Indian, Alaska Native	169	620	0
Pacific Islander	0	35	0
Hispanic	1,484	3,540	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2007-2011 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,385	37,210	0
White	2,385	23,120	0
Black / African American	605	5,760	0
Asian	270	1,505	0
American Indian, Alaska Native	80	620	0
Pacific Islander	0	40	0
Hispanic	900	4,640	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2007-2011 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,340	22,365	0
White	780	15,435	0
Black / African American	115	2,720	0
Asian	75	855	0
American Indian, Alaska Native	10	644	0
Pacific Islander	0	0	0
Hispanic	345	2,179	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2007-2011 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

In the 0-30% AMI bracket, a disparate need is represented by the Asian population of which 84.9% report one or more of the four housing problems noted in the introduction section above. This compares to 71.1% of the jurisdiction as a whole. For those households earning between 30-50% AMI, the Asian population reflects a disproportionately high rate of 37.8% reporting at least one (1) of the four (4) housing problems, as compared to 28% of the general population. No disproportionate needs have been identified in the 50-80% and 80-100% AMI categories and each ethnic minority group experiences housing problems in a similar manner as the general population.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

An analysis of the 2007-2011 Comprehensive Housing Affordability Strategy (CHAS) tables for the Oklahoma City area as reflected below show disproportionately greater **housing cost burdens** at varying levels among five (5) different minorities and ethnicities. A "disproportionately greater need" exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10% or more) than the income level as a whole.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	151,695	36,150	29,855	2,365
White	108,510	21,895	15,680	1,260
Black / African American	16,480	6,065	7,599	500
Asian	4,880	1,115	960	120
American Indian, Alaska Native	3,285	985	664	120
Pacific Islander	75	35	0	0
Hispanic	13,775	4,285	3,554	230

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2007-2011 CHAS

Discussion:

The CHAS data suggests that Black/African American households experience a cost burden in excess of 50% at an 11.5% disproportionately greater rate (25.2%) than the general populace at 13.7%. Pacific Islanders in the 30-50% AMI bracket experience a disproportionately greater cost burden at 15.2% above that of the general population (16.6%); however, it should be noted that the small sample size (.05% of the total population) makes comparison difficult.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

As noted previously, the following ethnicities in the 30-50% AMI category have reported one or more housing problems indicating a disproportionately greater need than the general population: Black/African American (10.6%), Asian (10.5%), and Pacific Islander (32.3%). Data for the Pacific Islander population is based upon a much smaller sample size than all other ethnic groups, and the projected need may appear to be more pronounced than for larger populations.

If they have needs not identified above, what are those needs?

It is apparent from public meeting input that African American communities continue to feel disenfranchised and marginalized. Fears of gentrification and lack of response to capital improvement needs were common themes related to Staff during the public participation process. There remains a general distrust of government due to the historical implications of past urban renewal failures, and miscommunication or non-communication with minority neighborhoods during more recent high profile development projects.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

Geographically, low income households are located throughout the metropolitan area; however, a significant concentration of Black and African Americans remain in the northeast quadrant of the City. Although the Black population changed little between the 2000 and 2010 Census as a share of the City's overall population, these families remain disproportionately concentrated in Census Tracts to the east and northeast of the city center. As the Hispanic population grew in absolute numbers and as a share of the population, the number of Census tracts with high concentrations of Hispanic residents also grew. However, such tracts tend to be located next to tracts with relatively high shares of Hispanics in 2000, which were clustered to the southwest and west of the downtown area.

NA-35 Public Housing – 91.205(b)

Introduction

An overview of the Oklahoma City Housing Authority from the Public and Assisted Housing section (91.110b) is as follows:

The PIC (PIH Information Center) data reflected in the following tables indicate that the Oklahoma City Housing Authority (OCHA) has a total of 3,989 total vouchers in use for project and tenant-based units. 3,728 of these are tenant based and 7 are project based. Average annual income of the tenants is \$9,493. 12.5% are elderly program participants at least 62 years of age and 30% are disabled. 34% of the tenants are White, 61% are Black/African American, and 1% are Asian. Other ethnicities account for less than 1% of all voucher holders. 4.4% self-identify as Hispanic.

The PIC data reflects a total of 2,999 public housing tenants who have an average annual income of \$9,260. The elderly comprise 27.6% of the total tenants and 6.7% are disabled. 52.8% of the public housing tenants are White, 41.3% are Black/African-American and 1.4% are Asian. Other ethnicities account for less than 1% of all public housing tenants. 21% self-identify as Hispanic.

OCHA administers 4,287 Section 8 Housing Vouchers. It is unknown if they will have a loss of funding over the five (5) year period covered by this Consolidated Plan resulting in a loss of vouchers. At the time of reporting, the waiting list is 5,634 families. The average waiting period is estimated at three (3) years for families applying at the time of reporting. While the turnover rate for vouchers remains high, the rate has steadily decreased over the previous five (5) years.

OCHA has set a goal of assisting ten (10) families in achieving homeownership each year through the Housing Authority Family Self-Sufficiency Program and the Housing Authority Homeownership Program. The Family Self-Sufficiency Program (FSS) is a five-year program where voluntary participants, in the Housing Choice Voucher Program (Section 8), enter a program designed to reduce the participant's dependency on public assistance. Families are assisted in meeting goals of a service plan created for a particular family. Since the Program has been in effect, more than 107 men and women have attained economic independence. OCHA is currently assisting 42 men and women enrolled in the FSS Program. When funding for OCHA's Homeownership Coordinator was eliminated, the public housing homeownership program effectively shut down. As a result, during calendar years 2013 and 2014, no public housing residents achieved homeownership, and no families were enrolled in the homeownership program.

The Oklahoma City Housing Authority is not listed by HUD as a "troubled" housing authority.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	4	2,999	3,989	7	3,728	67	99	32

Table 22 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	
Average Annual Income	0	9,023	9,260	9,493	9,243	9,374	11,803	8,094	
Average length of stay	0	6	4	5	2	5	0	2	
Average Household size	0	1	2	2	1	2	1	3	
# Homeless at admission	0	0	0	0	0	0	0	0	
# of Elderly Program Participants (>62)	0	0	828	499	1	471	13	0	
# of Disabled Families	0	4	625	1,189	6	1,106	17	7	

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
# of Families requesting accessibility features	0	4	2,999	3,989	7	3,728	67	99
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	2	1,584	1,352	5	1,222	27	50	22
Black/African American	0	2	1,204	2,430	2	2,311	37	41	9
Asian	0	0	42	47	0	43	1	3	0
American Indian/Alaska Native	0	0	169	160	0	152	2	5	1
Pacific Islander	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	631	177	0	164	0	7	0
Not Hispanic	0	4	2,368	3,812	7	3,564	67	92	32

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

At the present time, the Oklahoma City Housing Authority (OCHA) is unable to maintain a separate waiting list for accessible units. If an applicant's name comes to the top of the list and they are unable to function in a non-accessible unit, they can refuse the apartment without losing their place on the waiting list. In some cases, OCHA is able to accommodate the tenant with minor modifications to the available unit(s). Approximately 10% of available units are handicapped accessible. Many times, apartments are leased to a current tenant who has aged in place and now requires features that were not needed at the time of move-in. Units are modified as resources allow.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

Consultation with OCHA reveals the greatest need at the present time is an increase in funding for Section 8 assistance. The Oklahoma Policy Institute publishes information about the number of poor and the State of Oklahoma has historically ranked near the bottom in many categories. The Section 8 waiting list is presently at 5,623 even though the list was closed from December 2010 until May 19, 2014. At the time of the last Consolidated Plan (2010), the waiting list was 9,391 many of whom were forced to identify other housing resources or face homelessness.

The waiting list for public housing units was 998 for seniors and 1401 general occupancy at the time of reporting.

Capital improvements are also a pressing need. OCHA at the time of this report, had a backlog of modernization needs in excess of \$20 million, primarily due to the aging of properties. Capital Funds provided annually by the U.S. Department of Housing and Urban Development (HUD) have decreased from \$4.9 million in 2010 to a proposed appropriation of \$3.44 million in 2015, a decrease of nearly 30%. The cost of deferred maintenance exacerbates the existing problems and ultimately requires more costly repairs than would regularly scheduled maintenance and immediate correction of property deficiencies.

How do these needs compare to the housing needs of the population at large

The need for available affordable units mirrors that of the general population. The need continues to exceed the available resources. Market rate rental units generally do not maintain a waiting list and units can typically be occupied within 60 days. The need for capital improvements in public housing units is greater than that of the general population due to OCHA's reliance on HUD funding to meet ongoing property concerns. The private market by contrast is generally supported by the ability to increase gross rents in response to decreasing cash flow. In addition, the availability of private capital and the ability to borrow against equity at favorable loan terms provides a cushion of protection from rising maintenance costs.

Discussion

Increased funding for Section 8 continues to be the greatest need identified by the local housing authority. In addition, the wait list for public housing units continues to grow and presently exceeds 2400 units for families and seniors combined. Concentration of low income housing continues to be problematic for the City in terms of creating mixed-income housing throughout the urban core. The concentration of public housing and Section 8 units in low-income census tracts exacerbates social issues in impoverished neighborhoods and fails to provide a healthy environment for personal improvement.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

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. Using the annual PIT as a gauge of the needs of the chronically homeless, the City through community partnerships has worked to create permanent supportive housing beds in its efforts to eliminate homelessness.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	0	215	430	100	124	7
Persons in Households with Only Children	0	20	40	10	20	90
Persons in Households with Only Adults	258	1,008	2,532	100	150	365
Chronically Homeless Individuals	74	167	482	10	80	730
Chronically Homeless Families	0	4	8	0	3	730
Veterans	55	123	356	50	100	180
Unaccompanied Child	10	13	46	10	10	90
Persons with HIV	13	7	40	10	30	180

Table 26 - Homeless Needs Assessment

The demographic data provided is hard data taken from the 2014 Point-in-Time (PIT) count. Since the PIT count is only a one day survey, it is considered a snapshot of the population on a given day. It can be helpful in tracking trends but is not an accurate representation of the total homeless population. That being the case, the total homeless population for each subpopulation noted in the table above is considered to be higher than the number reported. The PIT provides the basis for the estimate.

Data Source Comments: Feedback from local service providers was also used in arriving at the estimates provided. At the time of reporting, the 2015 PIT data was not yet available.

Indicate if the homeless population is: Has No Rural Homeless

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Not Applicable

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	917	0
Black or African American	415	0
Asian	2	0
American Indian or Alaska Native	114	0
Pacific Islander	7	0
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	0	0
Not Hispanic	0	0

Data Source: In addition to the ethnicities noted in the table above, 26 persons self-reported as multi-racial. Data was not provided
Comments: for Hispanic ethnicity.

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

The City estimates that there are approximately 220 families in need of housing on any given night. The majority of them likely require prevention or rehousing assistance through the Emergency Solutions Grant (ESG) or another financial source that can provide a similar type of support. Only a small number of chronically homeless families have ever been located during the Point-in-Time count. These families are assessed and then housed if they are determined to be in the direst need. No veteran’s families were located during the most recent Point- in-Time count but Goodwill currently assists a small number with housing and services through the Supportive Service for Veteran's Families (SSVF) grant.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

In the table above, it is reported that 62% of the homeless population is White, 28% is Black/African American, 8% is American Indian, and 2% have self-reported as multi-racial. The numbers are representative of the community as a whole. This suggests that homelessness affects persons from all cultural and ethnic backgrounds proportionately without regard to racial identification.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Based upon the PIT count, an estimated 1008 adults are sheltered on any given night. An additional 258 remain unsheltered. Approximately 16.5% of those sheltered are chronically homeless and 12.2% are Veterans. 215 sheltered households have children present. Four (4) of these families are chronically homeless. Unaccompanied youths who are homeless, both sheltered and unsheltered, is a growing problem in the community.

Discussion:

The prevention of homelessness and rapid re-housing with associated supportive services remain high priorities in this Strategic Plan. Collaboration between the City and local service providers is ongoing. The City remains the lead entity in management of the Continuum of Care Committee. Activities included in this Consolidated Plan include the construction of a twenty (20) unit SRO project, STRMU and TBRA assistance, funding for case management resources, rapid-rehousing for families with children, and development of a drop-in center for homeless youth. In addition, multiple service providers are assisted with ESG, HOPWA and Continuum of Care grants to address social service needs.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

Priorities are assigned to objectives based on the availability of funds and on the needs identified within the community. Objectives that are ranked as high priority will be addressed through funding program activities in the Annual Action Year Plans. The non-homeless special needs population objectives focus on maintaining the ability of non-homeless special needs populations to continue independent living. Persons with HIV/AIDS and their families who are not homeless often have need of supportive services.

Services are available to assist the elderly and persons with disabilities, many of whom are in need of transportation services. During the term of the previous 5-year Consolidated Plan, CDBG funds were provided to subsidize taxi fares and bus coupons for special needs populations, including the elderly over age 62, persons who are disabled, and the homeless. CDBG funds will continue to be allocated for this purpose through the Central Oklahoma Transportation and Parking Authority (COTPA) Share-a-Fare program. CDBG-R funding was allocated during the last five (5) year Consolidated Plan period to expand the Heartline 2-1-1 system for intake and referral services for the homeless and persons with social service needs. The Heartline 2-1-1 system and the housing resource center will continue to assist persons returning from mental and physical health institutions to receive appropriate supportive housing.

Although this section specifically addresses non-homeless special needs, the annual PIT count of the homeless remains a valuable tool in identifying the needs of domestic violence victims. In 2014, 181 individuals (12% of those surveyed) reported experiencing domestic violence. Many of these individuals were unable to obtain safe and secure housing options after removing themselves from a threatening environment. The total number of cases involving domestic violence has been increasing in Oklahoma City each year. According to the 2010 PIT, there were 53 people identified as homeless due to domestic violence. In the 2014 PIT, 181 total cases were reported-an increase of 242%. Due to the fact that national statistics show that increases in domestic violence cases can be attributed to a high rate of poverty or significant economic stress such as job loss, we expect to see these trends to continue.

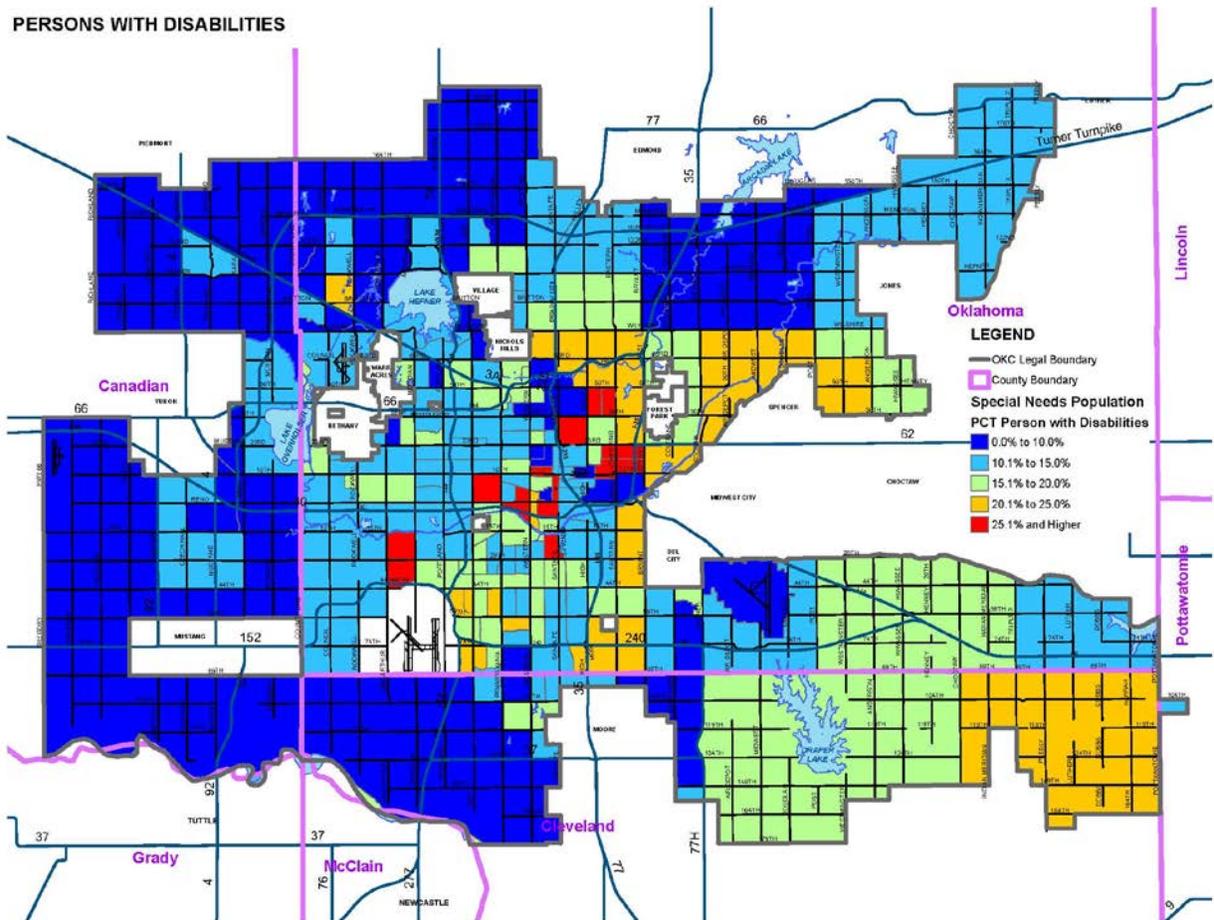
The primary obstacle to meeting underserved needs is funding availability. The City is not allocating HOME funds for Tenant Based Rental Assistance in the 2015-2020 Consolidated Plan or Annual Action Year Plans. Federal grant funds from the City's CDBG and HOME formula grants are used to fund the non-homeless needs activities identified in the Consolidated Plan. State agencies use their allocated funds to provide services to some of the recipients, and private donations to nonprofits help support the facility operations.

HOPWA

Current HOPWA formula use:	
Cumulative cases of AIDS reported	2,820
Area incidence of AIDS	100
Rate per population	8
Number of new cases prior year (3 years of data)	263
Rate per population (3 years of data)	7
Current HIV surveillance data:	
Number of Persons living with HIV (PLWH)	2,560
Area Prevalence (PLWH per population)	197
Number of new HIV cases reported last year	0

Table 27 – HOPWA Data

Data Source: CDC HIV Surveillance



Disabled Population

HIV Housing Need (HOPWA Grantees Only)

Type of HOPWA Assistance	Estimates of Unmet Need
Tenant based rental assistance	1,175
Short-term Rent, Mortgage, and Utility	0
Facility Based Housing (Permanent, short-term or transitional)	13

Table 28 – HIV Housing Need

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

Describe the characteristics of special needs populations in your community:

Residents with disabilities accounted for 21.5% of the population in 2000, and were highly concentrated in Census tracts near the interchange of Interstate 40 and I-235 in the city center. In 2008-2012, an estimated 13.3% of the population was living with some form of disability, and these residents remained concentrated in central census tracts, including tracts to the east and south of the city center. Please note that the Census Bureau substantially changed the part of the ACS questionnaire pertaining to disabilities in 2008. For this reason, direct comparisons between the 2000 Census and post-2008 ACS estimates are problematic. As a result, it would not be correct based upon this data to conclude that the share of residents with disabilities fell from 21.5% to 13.3%, since different measures were used in each dataset.

The City defines "special needs" as the homeless, seniors over age 62, persons with permanent disabilities, victims of domestic violence, abused children, and children aging out of the foster care system. As the Baby Boom generation matures, low to moderate income seniors over age 62 are in need of affordable housing alternatives. Resources for domestic violence victims have also been a common concern noted by the community throughout the public participation process. Local service providers are reporting a substantial increase in the number of homeless youth seeking resources and the need for drop-in centers.

What are the housing and supportive service needs of these populations and how are these needs determined?

The City of Oklahoma City works closely with the YWCA in order to provide supportive services to victims of domestic violence. Program oversight and funding for services are provided through the Oklahoma Attorney General's office. The YWCA is able to provide emergency shelter for 350 persons annually and permanent supportive housing for seven (7) families that have become homeless due to domestic violence. The YWCA also works to provide supportive services such as skill training for jobs, child care, counseling, legal services, transportation, and referrals to mental health services to keep the victim and family safe. One of the units is handicapped accessible. All units are equipped with

furnishings and basic household items. The YWCA reports a growing need for these services, particularly the need for more housing units in safe locations.

The State of Oklahoma Department of Human Services recently conducted a gap analysis for children exiting the foster care system. Their findings indicated a need for more housing options, improved transition services while still in child welfare custody, increased involvement of the child welfare specialists, and healthy connections with adults. Once children age out of the foster care system, they are often forced to enter the workforce and assume a monthly housing obligation with little or no marketable skills to facilitate gainful employment. Higher education remains economically impractical.

Reports of child abuse have continued to increase in recent years, along with the need for services to assist this population. The Oklahoma County Department of Human Services (DHS) reported in their fiscal year 2013 report on Child Abuse and Neglect Statistics that 70,796 reports on families were received, of which 35,967 contained allegations that meet the definition of abuse and neglect and required investigation or assessment. There were 49,542 children for whom an investigation was completed and a finding made. An assessment was completed for 7,546 children. Substantiations included cases of exposure to domestic violence, failure to protect, threat of harm, inadequate or dangerous shelter, lack of supervision, abandonment, inadequate physical care, exposure to substance abuse, and numerous instances of mental and physical abuse. The City of Oklahoma City will continue to work with local non-profits and service providers to assist in the protection and health of this vulnerable population.

Seniors over age 62 now account for 26.6% of the City's population according to the 2013 American Community Survey (ACS) 1-Year Estimates. This number is expected to increase as the baby boom generation reaches retirement age. The Envision 2020 Report on seniors was prepared by Oklahoma County in 2008 and indicates that one (1) in five (5) citizens will be over the age of 65 by the year 2030. The report identifies three (3) critical areas that must be addressed to create a long term viable plan for addressing the aging population. These include 1) economic well-being; 2) health, basic needs and housing; and 3) lifestyle, education, and technology. Emerging data shows that poverty among seniors is increasing. According to the 2013 ACS, there are approximately 162,424 persons over the age of 62. Approximately 11.6% of the population for whom poverty status is determined are 65 years of age and over. It is anticipated that programs and housing options for seniors will remain a priority throughout the Plan period.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

According to the data presented above, Oklahoma City has documented a cumulative total of 2,820 individuals who have been diagnosed with HIV/AIDS. On average, 263 new cases are diagnosed each year. 1,175 persons diagnosed with HIV/AIDS have received TBRA assistance through the HOPWA program. An additional 13 persons have been provided with short-term transitional housing. Approximately 197 persons are currently living with the HIV/AIDS virus in the Oklahoma City area.

Discussion:

Activities funded for the non-homeless special needs population include the Central Oklahoma Transportation and Parking Authority (COTPA) Share-a-Fare program which provides subsidized bus and taxi fares for special needs persons. In addition, more favorable loan terms are provided to non-profit organizations serving special needs populations for construction and rehab housing projects. CDBG funding has been allocated to assist local non-profits and service providers in meeting the immediate needs of child abuse victims, youth in foster care, and domestic violence victims. Applications are being reviewed at the time of this report and specific project activities have not yet been identified. It is anticipated that the non-homeless special needs population will be assisted in each Action Plan year as resources allow.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction’s need for Public Facilities:

Oklahoma City communities have an ongoing need for public facilities to provide community wide-benefit in low to moderate income neighborhoods. The City has historically restricted these improvements to the NRSA and SNI neighborhoods. Public facilities improvements supported in this Consolidated Plan include neighborhood-led projects within the SNI neighborhood boundaries and park improvements. Other public facility projects that support special populations may be considered, including a facility for the disabled to support employment and daily needs education, improvements to a care center for abused children, development of drop-in centers and an overnight shelter for homeless youth, and exploration of alternatives for future program activities that address the need for relocation, emergency shelter, counseling, and/or permanent supportive housing for victims of domestic violence.

How were these needs determined?

While all SNI public facility projects are initially requested by neighborhood residents through a public participation process, the decision on whether to fund them is based on several factors, including:

- Whether the facility already exists
- If so, the condition of the facility
- Anticipated need and number of end users
- Whether a public benefit is provided
- Whether the estimated cost to construct or repair the facility is reasonable
- Whether the project contributes to an overall goal of neighborhood reinvestment
- Anticipated maintenance costs and operational responsibilities over time
- Whether the responsible department or organization has the capacity to complete and oversee the project, and
- Whether there are potential adverse impacts to the health and safety of neighborhoods or individuals.

The other social service needs mentioned were identified through funding requests and input from the public and provider organizations during Consolidated Plan development. These projects will be evaluated based on the strength of proposals received, the capacity of the operating organization, and the availability of funds.

Describe the jurisdiction’s need for Public Improvements:

The most pressing need for public improvements in Oklahoma City neighborhoods is public infrastructure; specifically the construction of sidewalks, and adequate street lighting. The municipal boundaries of Oklahoma City contain a geographical area of 621 square miles, making it very difficult to

meet ongoing maintenance needs for public infrastructure. This large service area provides unique challenges in terms of both administrative and financial resources, and the City's capacity to keep pace with needed repairs is limited. Citizen surveys and comments received at public meetings continually identify sidewalks, lighting, and road repairs as primary needs.

Public improvement activities proposed in this Consolidated Plan include construction of sidewalks in the Classen Ten-Penn neighborhood, street lighting in the Midtown neighborhood, and tree planting and park improvements in the three (3) SNI neighborhoods. Infrastructure may also be needed in other low-moderate income areas for park improvements, or to support development of affordable housing and/or housing for seniors.

How were these needs determined?

While all SNI public improvement projects are initially requested by neighborhood residents through a public participation process, the decision on whether to fund them is based on several factors, including:

- Whether the requested improvements already exist
- If so, their current condition
- Anticipated need and number of end users
- Whether a public benefit is provided
- Whether the estimated cost to construct or repair the public improvement is reasonable
- Whether the project contributes to an overall goal of neighborhood reinvestment
- Anticipated maintenance costs over time
- Whether the responsible department or organization has the capacity to complete and oversee the project, and
- Whether there are potential adverse impacts to the health and safety of neighborhoods or individuals.

The other needs mentioned were identified through input from the public and developers during Consolidated Plan Development. All projects will be evaluated based on the strength of proposals received, the capacity of the operating organization, and the availability of funds. Considerations for funding non-housing projects include whether the project 1) serves a special needs population; 2) is in an underserved area; 3) will have a significant catalytic effect on investment; 4) promotes social equity; and/or 5) supports historic preservation.

Describe the jurisdiction's need for Public Services:

The demand for public services always exceeds available resources due to the CDBG 15% public services cap. The City of Oklahoma City, as a matter of practice, rarely provides funding for administrative costs and salary expense due to the continued expectation of funding over time. In an era of declining

resources, the inability to meet continued administrative expectations of an organization may jeopardize jobs and place the long term sustainability of an organization at risk.

The City does, however, support many worthy activities, and will continue to do so over the life of this Plan. Public service activities included in this Strategic Plan include hazardous tree removal, public services education for youth, crime and health topics, legal assistance to clear titles through probate, and summer & after school programs in the SNI neighborhoods.

How were these needs determined?

While all public services projects are initially requested by neighborhood residents through a public participation process, the decision on whether to fund them is based on several factors, including:

- Whether the service already exists
- If so, the adequacy and viability of the service provided
- Anticipated need, demand and number of persons to be served
- Whether a public benefit is provided
- Whether the estimated cost of the requested service is reasonable
- Anticipated operational and monitoring responsibilities over time, and
- Whether the responsible department or organization has the capacity to manage and oversee the program

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The purpose of the Market Analysis is to provide a clear picture of the environment in which the City must administer their programs over the five (5) year Consolidated Plan period. In conjunction with the Needs Assessment, the Market Analysis provides the basis for the Strategic Plan and Projects/Activities to be funded and administered. General characteristics such as housing costs, market demand, area demographics, type and condition of existing housing stock, planned development, and current economic conditions all provide a snapshot of community needs and opportunities, and have been considered in the development of this Plan.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

A variety of housing types for both rental and purchase, are available within the Oklahoma City metropolitan area at a wide range of sales prices and rents. The local housing stock includes single family residences, duplexes, row houses, multifamily apartment complexes, condominiums, modular units and mobile homes. As might be expected, older subdivisions within the urban core include aging housing stock. Targeted reinvestment by the City in the Neighborhood Revitalization Strategy Area (NRSA), continues to provide resources for rehabilitation and down payment assistance to incentivize revitalization and reinvestment in older neighborhoods.

Due to the large geographic area within the municipal boundaries (621 square miles), infill opportunities are plentiful. In recent years, growth has been concentrated to the North and West of the downtown area, with young families seeking homes outside the limits of the Oklahoma City public schools system in areas such as Edmond, Piedmont, Mustang, and Yukon. These growth patterns can be expected to continue during the next five (5) years of this Consolidated Plan.

To encourage reinvestment in older neighborhoods and to promote pedestrian oriented housing options, the City has strategically targeted three (3) neighborhoods in the central core as part of the Strong Neighborhoods Initiative Program. These include the Classen Ten-Penn neighborhood, Classen's North Highland Parked, and Culbertson's East Highland areas. The City of Oklahoma City continues to place emphasis on home ownership activities while also ensuring that sufficient housing options exist for public housing, Section 8 voucher assistance, and rental opportunities for persons of all ethnicities and income levels.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	172,440	67%
1-unit, attached structure	8,814	3%
2-4 units	14,963	6%
5-19 units	35,126	14%
20 or more units	16,146	6%
Mobile Home, boat, RV, van, etc	8,140	3%
Total	255,629	100%

Table 29 – Residential Properties by Unit Number

Data Source: 2007-2011 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	331	0%	2,836	3%
1 bedroom	1,918	1%	25,582	29%
2 bedrooms	23,117	17%	35,035	40%
3 or more bedrooms	111,023	81%	25,144	28%
Total	136,389	99%	88,597	100%

Table 30 – Unit Size by Tenure

Data Source: 2007-2011 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Targeted households and projected beneficiaries are detailed in the Strategic Plan section of this report and in the first year Annual Action Plan. In summary, the City will assist in approximately fifteen (15) whole house rehabs annually. An estimated fifty (50) households annually will receive exterior maintenance and/or a new storm shelter. One hundred (100) households annually will benefit from emergency home repairs. Seventy-five (75) homebuyers will be provided down payment and closing costs assistance. An estimated nine (9) units annually will be constructed using CHDO funds, and three (3) homes will be constructed by non-profit organizations in the SNI neighborhoods. Approximately twelve (12) single-family homes will be constructed for rental, and a twenty (20) unit SRO transitional housing project will be completed. Depending on future funding and program income, these annual estimates are expected to remain consistent over the five (5) year term of this Consolidated Plan.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

It is not anticipated that affordable housing inventory will be reduced in the near future. Older units assisted under the Low Income Housing Tax Credit Program (LIHTC) in prior years may possibly revert to market rate units upon satisfaction of the imposed affordability requirements; however, it is unknown at the present time if and when this may occur, and any projections would be truly speculative.

The Oklahoma City Housing Authority (OCHA) administers 4,287 Section 8 Housing Choice Vouchers. It is unknown if they will have a loss of funding over the next five (5) years that will result in a loss of vouchers. The Section 8 waiting list is 5,634, and has a waiting period estimated at over two (2) years. While the turnover rate for vouchers remains high, it has been steadily decreasing.

OCHA administers a total of 2,980 public housing units. The tenant share of rent is based on household income and a subsidized tenant may choose to pay more of their own rent to occupy a more expensive unit.

Does the availability of housing units meet the needs of the population?

Since the 2010 Census, the 2011 American Community Survey (ACS) estimates the population has grown by 13%, or 66,610 people. According to the 2011 ACS, there are 60,634 vacant housing units within the Oklahoma City area, which is an increase of 36,951 units since the 2000 Census (156%). The 2011 ACS reflects that of the 60,634 vacant housing units, 16,612 (27.4%) are for rent, 4,466 (7.4%) are rented but not occupied, 8,264 (13.6%) are for sale, 2,114 (3.5%) are sold but not yet occupied, 3,069 (5.1%) are for seasonal or occasional use, 292 (.04%), and 25,817 (42.6%) are classified as "other vacant". A market for rental and for-sale housing exists at all income levels, and demand exists for additional housing units that are affordable for low and very low income households.

Demand for housing is constantly changing and is influenced by changes in personal finances, growth or changes in family size, and consumer confidence among other factors. Some households are seeking larger or newer residences, while others are downsizing from a home that has become too large or too expensive for the owner based on changing circumstances. When considering unit size by tenure, 81% of the owner occupied housing stock has three (3) or more bedrooms. For renters, two (2) bedroom units are the most common floor plan (40%). As family sizes continue to decrease and the Millennial generation matures, it can be anticipated that demand for two bedroom single family homes with smaller square footage will increase over time.

Describe the need for specific types of housing:

At the present time, demand for all housing types appears to be satisfied by the private market. Community surveys and public comments do, however, indicate a preference for more affordable and workforce housing in the Central Business District which would enable those persons working downtown to adopt an urban and pedestrian lifestyle. Condominium prices and rental rates in the urban core are priced for the upper end of the market, and are not accessible to lower and median income households. The City continues to place emphasis on mixed-income development to create economic diversity and ensure equal housing opportunity in all areas of the city.

Discussion

Affordable housing and the rehabilitation of aging housing stock remain high priorities under this Plan. Needs and opportunities will be evaluated annually to ensure that resources are targeted strategically and that the stated goals of the Plan remain timely and relevant. Emphasis on mixed-income housing and deconcentration of poverty will remain a focus in all funding decisions.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

The 2011 CHAS and ACS data below reflects a 66% increase in median home values since the completion of the 2000 Census. Of the owner occupied households, only 12.9% of homes are affordable to families earning between 50-80% AMI. This number increases to 35.9% for households between 80-100% AMI and 51.3% for households earning 100% or greater of the area median income.

Median contract rents are \$533 per month which represents a 38% increase since the 2000 Census. Average rents are concentrated at the low end of the market with 45.4% of renters paying less than \$500 per month and 48.6% paying \$500-\$999. Less than 1% of all renters pay more than \$2,000 in monthly rent. Of the rental households earning less than 30% of area median income, only 6.3% of the total available units are affordable to the tenant. This number increases to 28% for households between 30-50% AMI, and 65.8% for households between 80-100% AMI.

Cost of Housing

	Base Year: 2000	Most Recent Year: 2011	% Change
Median Home Value	78,100	129,300	66%
Median Contract Rent	386	533	38%

Table 31 – Cost of Housing

Data Source: 2000 Census (Base Year), 2007-2011 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	40,251	45.4%
\$500-999	43,036	48.6%
\$1,000-1,499	3,494	3.9%
\$1,500-1,999	988	1.1%
\$2,000 or more	828	0.9%
Total	88,597	100.0%

Table 32 - Rent Paid

Data Source: 2007-2011 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	5,980	No Data
50% HAMFI	26,695	12,595
80% HAMFI	62,830	35,044

% Units affordable to Households earning	Renter	Owner
100% HAMFI	No Data	50,093
Total	95,505	97,732

Table 33 – Housing Affordability

Data Source: 2007-2011 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	503	584	748	1,024	1,229
High HOME Rent	509	565	723	989	1,103
Low HOME Rent	509	565	692	800	892

Table 34 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

There is a significant need for rental units affordable to households earning less than 30% of area median income. At present only 6.3% of available units are available to this demographic. The problem persists for households earning between 30-50% AMI as only 28% of rental units are affordable to this population. A rental unit is considered affordable if gross rent, including utilities, is no more than 30% of the annual household income.

On the homeownership side, nearly half of all units are unaffordable to households earning less than 80% of the area median income. An owner unit is considered affordable if monthly housing costs, including principal and interest, taxes, hazard insurance, mortgage insurance and HOA dues are no more than 30% of the annual household income.

How is affordability of housing likely to change considering changes to home values and/or rents?

Based upon the 66% increase in median home values between the 2000 Census and the 2011 ACS, it can be anticipated that average home prices will increase approximately 4.7% annually. Although economic factors can contribute significantly to housing values, Oklahoma City has remained somewhat insulated from the recent recession and the local housing market has experienced very minor price movement in comparison to other parts of the country. While the rate of return may not be as significant in times of prosperity, losses are historically less likely in times of economic distress.

Similarly, based upon the data from the 2000 Census and 2011 ACS, median contract rents can be expected to increase approximately 3% annually. Median household income increased from \$34,947 in the 2000 Census to \$45,824 in the 2013 ACS. This indicates that historically, annual household earnings have increased only 2.1% annually resulting in a growing disparity between median income levels and housing costs. It can be anticipated that demand for affordable housing options will continue to increase as the housing cost burden continues to escalate.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

The *median* gross rent in Oklahoma City was \$762 according to the 2013 ACS and the *average* gross rent was \$780; however, the data does not indicate the number of bedrooms, or property type (e.g. Single Family, Multifamily). By comparison, the 2013 HUD Fair Market Rents for Oklahoma City were \$503 for an efficiency unit, \$584 for a one-bedroom unit, \$748 for a two-bedroom unit and \$1,024 for a three-bedroom unit (an average of \$715 per month). Using this methodology, FMR's are estimated to be approximately 8.3% below the average gross market rents. Four bedroom units are considered to be an outlier and are not included in this calculation. The difference between the average gross rents and FMR's indicate a continued need for affordable housing subsidies for low and very low income families.

The High HOME Rent is \$509 for an efficiency unit, \$565 for a one-bedroom unit, \$723 for a two-bedroom unit and \$989 for a three-bedroom unit (an average of \$697 per month). Low HOME Rent is currently \$509 for an efficiency unit, \$565 for a one-bedroom unit, \$692 for a two-bedroom unit, and \$800 for a three-bedroom unit (an average of \$642 per month). It is important to note that the FMR and HOME rent standards are *inclusive* of monthly utilities, so comparison with the average market rents quoted above (which do not include utilities in most cases) can be misleading. In actuality, HOME-assisted units are capped at a monthly rent that is affordable to low income families when all costs are considered. By contrast, the market driven data is reflective of all households without regard to total monthly housing cost.

Market rents have remained steady over the last several years in the Oklahoma City area with average annual rent increases typically below the national average. However, the demand for additional affordable rental units has continued to increase as the cost of housing in relation to annual household income continues to rise disproportionately, particularly among the very lowest income families. High concentrations of poverty within the City have restricted the mobility of low income households, and the average rents are not reflective of higher end markets in thriving neighborhoods. Priority housing needs and annual objectives identified in this Plan continue to support mixed-income development and diversity of neighborhoods.

Discussion

In arriving at conclusions about the rental housing market, a presumption was made that households of one or two persons occupy the efficiency and one-bedroom units, small related households for three (3)

or four (4) persons occupy the two-bedroom rental units, and that large related households of five (5) or more persons occupy the three-bedroom and larger units.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

The 2007-2011 ACS data below reflects that 23% of owner-occupied units and 45% of rental units suffer from at least one adverse condition. These include (1) Lacking complete plumbing facilities, (2) Lacking complete kitchen facilities, (3) more than one person occupancy per room, and (4) cost burden exceeding 30%. It is also noted that 54% of owner-occupied units and 63% of rental units were constructed prior to 1979.

Definitions

Standard Condition- The 1978 BOCA Basic Property Maintenance Code , as amended, is the City's adopted minimum acceptable standards for the maintenance of existing buildings, structures, premises and facilities to protect the general health and welfare of the public. The code was adopted and incorporated fully to control property maintenance in existing buildings within the corporate limits of the City. Homes that do not meet this definition are considered substandard.

(Ordinance No. 15852, Section 1(8-19), 6-24-80; Ordinance no. 16823, Section 1, 8-10-82, Section 24-11)

Substandard Condition but Sustainable for Rehabilitation: Any home that does not meet the above definition of standard condition, may be determined to be financially feasible and structurally suitable for rehabilitation as long as the current condition of the home does not create a nuisance or post a threat to the health, safety and/or welfare of the surrounding neighborhood or residents. If City funds are needed to complete the rehabilitation then the cost of the rehab must not exceed the housing rehabilitation program's funding limits.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	31,215	23%	39,537	45%
With two selected Conditions	768	1%	2,587	3%
With three selected Conditions	75	0%	189	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	104,331	77%	46,284	52%
Total	136,389	101%	88,597	100%

Table 35 - Condition of Units

Data Source: 2007-2011 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	23,430	17%	8,945	10%
1980-1999	38,062	28%	23,448	26%
1950-1979	56,513	41%	41,687	47%
Before 1950	18,384	13%	14,517	16%
Total	136,389	99%	88,597	99%

Table 36 – Year Unit Built

Data Source: 2007-2011 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	74,897	55%	56,204	63%
Housing Units build before 1980 with children present	11,704	9%	6,060	7%

Table 37 – Risk of Lead-Based Paint

Data Source: 2007-2011 ACS (Total Units) 2007-2011 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 38 - Vacant Units

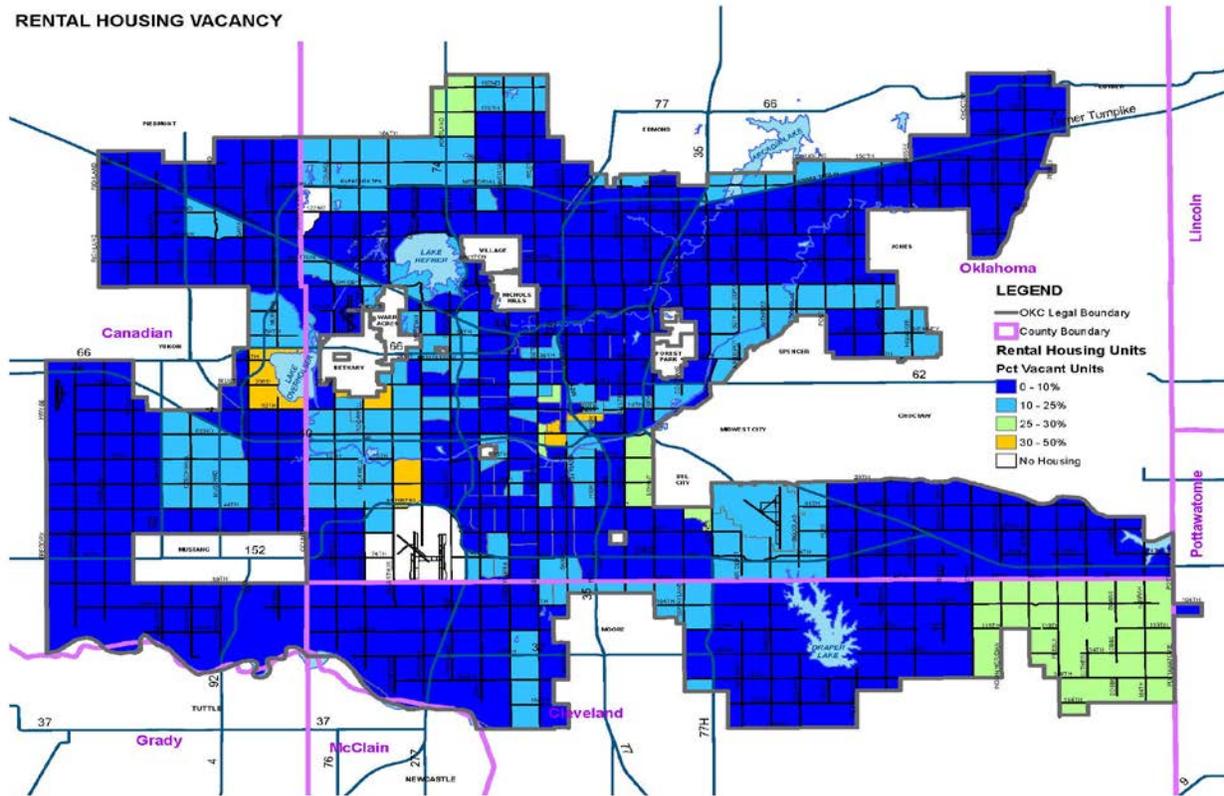
Alternate Data Source Name:

Vacant and Abandoned Buildings Study- OKC

Data Source Comments:

The Vacant and abandoned building study completed by GSBS Richman Consulting in June 2013 indicates a total of 12,106 vacant and abandoned buildings that have been unoccupied for more than six (6) months. Of these, half have been vacant for more than two (2) years. 3% are commercial, 26% are multifamily residential, and 71% are single family residences. The Vacant properties are disproportionately located in Wards six (6) and seven (7). The number of vacant and abandoned properties has increased by 25% over the past decade as opposed to 12% for all housing. It is unknown how many of these abandoned properties are suitable for rehabilitation without a comprehensive site inspection.

RENTAL HOUSING VACANCY



Rental Vacancy Rates

Need for Owner and Rental Rehabilitation

As noted previously, 54% of owner occupied residences and 63% of rental units were constructed prior to 1979. This large supply of aging housing stock in itself is an indicator that rehabilitation needs will continue to increase over the five (5) year Consolidated Plan period. Additionally, 23% of owner occupied residences and 45% of rental units reported in the table above have at least one (1) substandard condition that requires immediate attention. The City does not maintain a database or inventory of substandard housing. The recently released 2013 ACS 1-year estimates shows 134,949 owner-occupied housing units of which 99.7% have complete plumbing facilities and 99.3% have complete Kitchen facilities. The 2013 ACS data reflects 97,153 renter-occupied units of which 99.2% have complete plumbing facilities and 98.9% have complete kitchen facilities. The 2007-2011 data reflects a higher percentage of adverse conditions due to the inclusion of cost burden and overcrowding data which is not included in the 2013 ACS estimates.

The majority of City-funded rehabilitation programs support owner-occupied housing units because the City's affordable housing strategy encourages homeownership, and HOME funds allocated to the City are not sufficient to cover the demand for rehabilitation in the private rental market. However, the City does allocate CDBG and HOME funds for rehabilitation of rental housing owned by the Oklahoma City

Housing Authority, the acquisition and rehab of transitional housing units owned by non-profit organizations, and for smaller 4-8 unit rental housing projects.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

The 2007-2011 ACS (total units) and the 2007-2011 CHAS (units with children present) data reflects that 74,897 owner occupied units were built prior to 1980, of which 9% have children present. On the rental side, 56,204 units were built prior to 1980, of which 7% have children present. Based upon the income demographics for total households in Section NA-05 (2007-2011 CHAS data), 43.7% of all households earn less than 80% of area median income. When applying the same percentages for determination of potential Lead Based Paint hazards, it can be expected that approximately 32,730 owner-occupied homes built prior to 1980 are occupied by low or very low income families. Likewise, it can be estimated that 24,561 rental units constructed prior to 1980 are occupied by low or very low income households.

Discussion

Within Oklahoma City, all of the homes built prior to 1950 that have been tested for lead based paint have tested positive. Since July 2001, the Housing Rehab Staff has tested and cleared every home that the City has rehabilitated to the standards for lead-safe housing regulated by the Department of Housing and Urban Development (HUD) and the State of Oklahoma's Department of Environmental Quality (DEQ).

The central city neighborhoods contain most of the housing constructed prior to 1978, and the City's Neighborhood Revitalization Strategy Area (NRSA) encompasses most of this area. The NRSA encompasses the majority of the City's low-income census tracts and is the area where the City directs approximately 80% of its federal grant funds. The City of Oklahoma City consults with the Oklahoma State Department of Health on Lead Based Paint and housing. In 1994, legislation was adopted by the State establishing the Oklahoma Childhood Lead Poisoning Prevention Program under the administration of the Oklahoma State Department of Health (OSDH), and created the Childhood Lead Poisoning Prevention Advisory Council. The Childhood Lead Poisoning Prevention Advisory Council submitted rules for the Program to the OSDH that were approved in 1995 and adopted by the Governor the same year.

The City is directly involved in alerting and educating households concerning lead hazards, particularly regarding housing units proposed for CDBG or HOME rehabilitation assistance, and indirectly through each of its sub recipients, Community Development Housing Organizations, and other for-profit and nonprofit organizations providing housing. For its part, all applicants seeking housing assistance from the City receive a pamphlet informing them of the dangers of lead hazards. If assistance is granted to an applicant, they sign for the information at loan closing.

All housing rehabilitation inspectors for the City of Oklahoma City are licensed and certified as lead-based paint risk assessors, inspectors and abatement supervisors. The lead paint inspection and assessment services of the City's licensed staff are used by most housing providers receiving federal funds from the City and other non-profit housing providers contract for the services. Some of the rehabilitation staff members are certified as Lead Abatement Supervisors and Risk Assessors for target housing and child-occupied facilities. The Rehabilitation staff inspectors are trained in NITON Spectrum Analyzer/Radiation Safety. The areas of highest need in Oklahoma City are tracked by zip code and will be included in the next Lead Exposure Risk Assessment Questionnaire. Staff recommends to families receiving federal funds for home rehabilitation that children aged 12 to 24 months receive a blood lead test.

The City's NRSA includes all or a portion of fourteen (14) zip codes. The areas of concern within the NRSA (by zip code) are: 73102, 73103, 73104, 73105, 73106, 73107, 73108, 73109, 73111, 73117, 73118, 73119, 73129, and 73159. All properties within the NRSA are considered to be at higher risk for lead poisoning than newer areas of the City. Due to the age of these older neighborhoods, most homes were constructed prior to 1978 and many are much older. Although not all homes in the NRSA will require abatement, the risk remains higher than in other areas of the City that were constructed much later.

The Oklahoma State Department of Health tracks individual cases of children with elevated blood lead levels.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

Public Housing: The Oklahoma City Housing Authority owns 3,066 public housing units in projects and scattered rental units. The units are divided among senior and general occupancy units.

Senior Housing Units:

- 1,396 elderly housing units are located in eleven (11) housing development sites
- 998 applicants are on a waiting list for elderly units at the time of reporting.
- The occupancy rate on the units is 99%
- The average age of these structures is 42 years
- All residents are low income-the majority are very-low income

General Occupancy Housing Units:

- 1,670 housing units classified as family units are located at six (6) developments and on multiple scattered sites.
- 1,401 applicants are on a waiting list at the time of reporting.
- The average age of the multifamily development structures is 54 years. The 451 scattered site units range in age from 26-77 years old.
- The occupancy rate is 96%.
- All residents are low income-the majority being very-low income.

Section 8 Housing:

OCHA administers 4,287 Section 8 Housing Choice Vouchers. There are 1,197 participating landlords. It is unknown if a loss of funding will be experienced over the next five (5) years resulting in a loss of vouchers. The Section 8 waiting list is 5,634 households at the time of reporting and there is an average waiting period of over two years. This reflects significant improvement since the last Consolidated Plan was drafted in 2010, at which time a waiting list of 9,391 was reported. It must be noted, however, that the waiting list was closed for over three years and much of the decrease can be attributed to attrition rather than the provision of vouchers. The Section 8 waiting list was closed from

December 2010 until May 19, 2014. While the turnover rate for vouchers remains high, the rate has been steadily decreasing over the past 5 years. A person or family applying at the time of this report can anticipate a waiting period of at least three (3) years before receiving assistance.

To summarize, OCHA administers a total of 7,353 housing units. The tenant share of rent is based on household income and a subsidized tenant may make a choice to pay more of their own money to have a more expensive rental unit.

Housing Authority Goal

OCHA has set a goal of assisting ten (10) families in achieving homeownership each year through the Housing Authority Family Self-Sufficiency (FSS) Program and the Housing Authority Homeownership Program. The Family Self-Sufficiency Program (FSS) is a five-year program where voluntary participants in the Housing Choice Voucher Program (Section 8) enter a program designed to reduce the participant’s dependency on public assistance. Families are assisted in meeting goals of a service plan created for a particular family. Since the Program has been in effect, more than 107 men and women have attained economic independence. OCHA is currently assisting 42 men and women enrolled in the FSS Program. When funding for OCHA’s Homeownership Coordinator was eliminated, the public housing homeownership program effectively shut down. As a result, during calendar year 2013-14, no public housing residents achieved homeownership, and no families were enrolled in the homeownership program. Another funding source must be identified if this program is to provide homeownership benefit during the five (5) year Consolidated Plan period.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	4	3,073	4,137	165	3,972	389	767	321
# of accessible units									

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 39 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The Housing Authority's Capital Funds are used for major repair and replacement of failed systems. OCHA has experienced an annual decrease in Capital repairs and improvements funding since 2010 that has severely limited the amount of upgrades that are possible to complete. This trend is expected to continue in future years. Oklahoma City allocates CDBG funds to OCHA annually to rehabilitate approximately 16 low-rent public housing units a year. In total OCHA is able to rehabilitate 1,089 units on average per year.

Public Housing Condition

Public Housing Development	Average Inspection Score
Will Rogers Courts + 49 Scattered Site Units (AMP no. 101)	77
Oak Grove + 82 Scattered Site Units (AMP no. 102)	64
Ambassador Courts (AMP no. 103)	80
Sooner Haven + 109 Scattered Site Units (AMP no. 104)	65
Fred Factory Gardens (AMP no. 105)	84
369 Scattered Site Units (AMP no. 106)	66
Marie McGuire Plaza & Wyatt F. Jeltz Senior Center (AMP no. 111)	77
The Towers Apartments & Classen Senior Center (AMP no. 112)	96
Danforth Senior Center & Candle Lake Senior Center (AMP no. 113)	94
Shartel Towers (AMP no. 114)	92
Andrews Square (AMP no. 115)	91
Reding Senior Center, Reding Annex & Hillcrest Senior Center (AMP no. 116)	80

Table 40 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

The average public housing unit in Oklahoma City is 48 years old. Capital improvement funds received by the Oklahoma Housing Authority continue to decrease and are insufficient to address all necessary maintenance needs. Since 2010, capital improvement funds allocated to the PHA from HUD have decreased from \$4.9 million to \$3.4 million (30.6%). OCHA, at the time of this report, has a backlog of modernization needs in excess of \$20 million due to the age of properties and insufficient maintenance reserves.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

The Oklahoma City Housing Authority (OCHA) is a nonprofit organization operating in accordance with policies established by the Board of Commissioners and statutes administered by the U.S. Department of Housing and Urban Development (HUD). They are dedicated to one purpose, providing clean, safe and decent housing for low-income families and senior citizens of Oklahoma City. Special services are offered to residents that want to have and enjoy a better quality of life for themselves and their families. Some services help working parents with low-cost child care and can aid in the growth and development of the family as a whole. OCHA's own armed security force with uniformed vehicle, bicycle and foot patrol officers make their rounds 24 hours a day, seven days a week. The many youth

programs, neighborhood watch programs and the Drug and Crime hotline have proven to be very effective.

Providing affordable, clean and safe housing is just the beginning of the assistance offered. All apartment complexes have their own community/recreation center. These centers are available to all residents. Activities for children, teens and adults are conducted in these facilities as well as in other nearby locations. Also, modern playground equipment is available so children can enjoy a safe place to play outdoors.

Discussion:

The City of Oklahoma City maintains a collaborative relationship with the Oklahoma City Housing Authority. Federal CDBG funds have historically been provided to support the rehabilitation of public housing units, although this support is minimal in relation to overall need. Due to decreased federal funding for capital repairs, the need for capital improvements in public housing projects continues to exceed available resources resulting in a maintenance backlog. The need for additional Section 8 vouchers remains a critical need in the community, with average wait times exceeding two (2) years. Affordable housing options for low to moderate income families remain limited, and efforts to produce and rehabilitate more affordable units are highly prioritized in this Consolidated Plan.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

The priorities and specific activities focus on maintaining the ability of special needs populations to continue independent residency. Services are available to assist persons with special needs that include the elderly and persons with disabilities. One key recurring issue for persons with special needs continues to be access to transportation. The City continues to allocate CDBG and ESG funds to COTPA (Central Oklahoma Transportation and Parking Authority) to support the Share-a-Fare program, a program that provides discounted coupons for bus and taxi fare to eligible persons. The City is currently funding the expansion of beds available to the homeless with HOME and CDBG funds, and will continue to support these types of activities as funds allow.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	278	43	65	166	0
Households with Only Adults	849	0	85	171	0
Chronically Homeless Households	400	0	60	200	20
Veterans	10	0	38	161	0
Unaccompanied Youth	18	0	30	20	0

Table 41 - Facilities and Housing Targeted to Homeless Households

Data Source Comments:

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Whenever an intake is done with a client, an inventory is taken of the sources of their cash income and other mainstream resources. If a person qualifies for mainstream benefits that they have not yet applied for, their case manager will help them through that process. If a client receives MEDICAID or MEDICARE, they can use it to obtain health services from a general provider. However, the State of Oklahoma did not expand MEDICAID under the new health care law so there are still many clients who cannot receive this assistance. The primary resource for people in that situation is one of a handful of local providers of healthcare to the low income and homeless.

Several homeless service providers within the Oklahoma City Continuum of Care (CoC) specialize in working with individuals with mental health concerns. Case managers with these organizations all receive SSI/SSDI Outreach, Access and Recovery (SOAR) training and can connect their clients to SSI/SSDI benefits. All of the Community Mental Health Centers in Oklahoma City collaborate with housing providers within the CoC to provide services to their clients. Two of these Centers are CoC housing providers themselves. Nearly every homeless service provider in Oklahoma City as well as numerous government organizations are members of the Coalition to End Poverty. In 2014, this group determined several service areas for their clients that they felt required increased emphasis. At the top of this list was employment. Service providers have since met with several providers of employment services for input. The intent is to assist in designing programs for different client populations, and then partnering with the appropriate organizations that can provide them.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

The 10 Year Plan to End Homelessness proposes an increase in the number of permanent supportive housing units for families and individuals including chronically homeless persons. In support of this goal, the City provided CDBG and HOME funding to support development of a project by a local service provider to construct twenty (20) new single room occupancy (SRO) units on the campus of the Westtown Resource Center. The City continues to allocate federal grant funds to assist non-profit and for-profit housing developers to rehabilitate and construct new affordable housing, and by providing funding assistance to Community Housing Development Organizations. The City also supports the Continuum of Care program by providing funding for the construction and rehabilitation of permanent supportive housing for the homeless, assisting OCHA in funding the rehabilitation of public housing units, and funding activities that assist persons with AIDS in maintaining permanent housing.

In 2014, ESG funds were provided to thirteen (13) agencies to assist in the provision of emergency shelter, and transitional housing for mentally ill persons, victims of elder abuse, homeless youth, and victims of domestic violence. ESG funding is also used to continue the Coordinated Case Management

(CCM) program. This project focuses resources on housing homeless families quickly and helping them remain in their current home if possible. To provide these needed activities, the City consults with a number of agencies that include the Oklahoma Department of Rehabilitative Services, COTPA, Oklahoma City Housing Authority, providers of transitional and permanent supportive housing, and the Homeless Alliance among others.

The City of Oklahoma City Continuum of Care (CoC) uses a “No Wrong Door” approach to homelessness. An individual or family can have an assessment done by any CoC provider agency simply by walking in the door or by calling 211. Based on that assessment, clients will be directed to the organization that is most suited to their needs. Three CoC organizations provide prevention and rehousing assistance using Emergency Solutions Grant funds. These services predominantly serve non-chronically homeless families but occasionally serve chronically homeless as well.

In 2013 the OKC CoC joined the 100,000 Homes Campaign with the goal of housing the City’s chronically homeless population by the end of 2016. The City’s local name for this effort is Journey Home OKC. Several CoC organizations as well as government agencies have joined in this effort including the Veteran’s Administration (VA) and the Oklahoma City Housing Authority (OCHA). Currently, OCHA provides 7 housing vouchers a month for these clients and over three hundred (300) individuals have been housed. This effort serves both chronically homeless individuals and families.

As the Veterans Administration is part of the Journey Home effort, veterans and their families are served by the program too with VASH and other veteran’s housing resources used for housing support. Additionally, services can be provided to veteran’s families by Goodwill through the Supportive Services for Veteran’s Families program.

The Continuum of Care committee continues to seek more efficient methods of locating unaccompanied youth in Oklahoma City. The City’s primary outreach provider, Be the Change, operates a program that targets unaccompanied youth, with an emphasis on LGBT youth. Additionally, Be the Change recently opened a drop-in center for unaccompanied youth of all ages where homeless youth can be connected with the appropriate services.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

The priorities and specific objectives focus on maintaining the ability of special needs populations to continue or achieve independent residency.

Services are available to assist persons with special needs including the homeless, low to moderate income seniors over age 62, persons with permanent disabilities, victims of domestic violence, abused children, and children aging out of the foster care system. One key recurring issue with persons with special needs continues to be access to transportation. The City continues to allocate CDBG and ESG funds to Central Oklahoma Transportation and Parking Authority (COTPA-Oklahoma City's Transit Authority) to implement the Share-a-Fare program, a program that provides discounted coupons for bus and taxi fare to eligible persons. The City, using prior year CDBG-R funding, purchased a bus to expand the homeless transportation system operated by Community Health Centers, Inc (aka Healing Hands) to transport persons needing specialty health care and other social services.

In past years, the City made HOME funds available to support Low-Income Housing Tax Credit (LIHTC) applications when the Oklahoma Housing Finance Agency (OHFA) provided significant priority in the scoring of projects to incentivize the investment. Although funding is not recommended in the first year Action Plan under this Consolidated Plan, a change in the Qualified Allocation Plan (QAP) point structure for local leverage may justify future consideration for this activity.

The City has and will continue to support applications for the development of Section 202 and 811 projects to assist with the provision of housing for the elderly and handicapped individuals and families.

The City will continue to fund programs that help address problems for homeowners with exterior maintenance grants, emergency repairs, and whole house forgivable rehabilitation loans to elderly persons at or below 60% of median income. The programs will assist these persons in maintaining their residency.

Federal grant funds from the City's CDBG entitlement and the HOME entitlement are used to fund the activities outlined. To provide these needed activities, the City consults with a number of agencies that include the Oklahoma Department of Rehabilitative Services, Central Oklahoma Transportation and Parking Authority, Oklahoma City Housing Authority, Providers of transitional and permanent supportive housing, and the Homeless Alliance among others.

HOPWA Assistance Baseline Table

Type of HOWA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
TBRA	13
PH in facilities	0

Type of HOWA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
STRMU	43
ST or TH facilities	6
PH placement	0

Table 42– HOPWA Assistance Baseline

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Currently, the OKC CoC has several programs that can serve elderly homeless individuals. All permanent supportive housing programs within the Continuum of Care (CoC) boundaries can serve elderly individuals and the Journey Home OKC program can house them fairly quickly if their Service Prioritization Decision Assistance Tool (SPDAT) score determines that they are in immediate need. The same is true of those with mental, physical and developmental disabilities. One of the lead partners in the Journey Home program provides mental health services and case management to chronically homeless clients in that program as well as non-chronically homeless in other programs. Additionally, there are several other housing providers that also specialize in serving the mentally ill. Accessible units are located for individuals with physical or developmental disabilities and a professional case manager is assigned.

The CoC currently operates two programs that function as rehab and recovery for individuals with drug and alcohol addiction. Clients can stay up to two (2) years and then are moved into their own permanent housing once completing the program. Aside from these two programs though, most service providers have expressed a need for more professional treatment programs for their clients.

Homeless and low income individuals with HIV/AIDS and their families are predominantly served by the CoC's HOPWA provider (Oklahoma AIDS Care Fund). This agency provides various types of housing support as well as case management services and collaborates with other agencies that can help provide other needed services such as health care.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Oklahoma has a state mandated discharge policy for individuals exiting mental and physical health institutions. Ideally, these individuals should be connected with family or an agency that can provide them with housing. Unfortunately, this does not always occur. When it does occur, these individuals are referred to one of the CoC's providers that specialize in housing for those with mental health concerns,

or one that can accommodate any physical disabilities they may have. These individuals will be assessed and housed if they are determined to be in the direst need. If they cannot be housed immediately, providers will connect them with the services necessary to address other concerns.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

Not applicable to entitlement grantees. Please see response to the following question.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

The priority needs and specific objectives focus on maintaining the ability of special needs populations to continue and/or achieve independent residency. One-year goals related to non-homeless special needs include ongoing support of the Share-a-Fare program to support transportation options for elderly and disabled populations, continued funding of STRMU and TBRA using HOPWA funds to preserve existing housing for persons with HIV/AIDS, and CDBG funding reserved for future public facilities improvements and/or public service activities to serve non-homeless persons with special needs.

Services are available to assist persons with special needs including the elderly and persons with disabilities. One key recurring issue with persons with special needs continues to be access to transportation. The City continues to allocate CDBG and ESG funds to COTPA (Oklahoma City's Transit Authority) to implement the Share-a-Fare program, a program that provides discounted coupons for bus and taxi fare to eligible persons. The City will continue to make grant funds available to assist projects and applications that support special needs populations on a competitive basis.

The City will continue to support applications for the development of Section 202 and 811 projects to assist with the provision of housing for the elderly and handicapped individuals and families. The City will continue to fund programs that help address problems for homeowners with exterior maintenance grants, emergency repairs, and whole house forgivable rehabilitation loans to elderly persons at or below 60% of median income. The programs will assist these persons in maintaining their residency. Federal grant funds from the City's CDBG and HOME allocations are used to fund the activities outlined. To provide these needed activities, the City consults with a number of agencies that include the Oklahoma Department of Rehabilitative Services, COTPA, Oklahoma City Housing Authority, Providers of transitional and permanent supportive housing providers, and Homeless Alliance among others. Federal grant funds from the City's CDBG entitlement and the HOME entitlement are used to fund the activities outlined.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

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

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

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

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

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

- Adoption of the International Existing Building Code; This Code applies to multi-family housing and reduces financial barriers to renovating existing building by allowing greater flexibility in materials used in the renovation;
- The City has exempted impact fees for water and sewer in the core area of the city to reduce the cost of infill housing and other redevelopment efforts;
- The City has exempted the fees for permits to nonprofit builders of affordable housing;

- The City does not require engineering or architectural seals for nonprofit affordable housing developers;
- Building permit fees are waived by policy for nonprofit charitable organizations engaged in the construction or remodeling of one or two family dwellings for the purpose of providing housing assistance to low-income persons or households;
- There are no licensing requirements for builders or professionals except in the case of high-rise structures.

The City's response to the noted impediments is more clearly defined in Section AP-75 of the Action Plan, and will be reviewed annually to ensure compliance with Fair Housing requirements.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

The City of Oklahoma City participates in a regional Comprehensive Economic Development Strategy (CEDS) administered by the Association of Central Oklahoma Governments (ACOG). The CEDS identifies four (4) primary goals towards achievement of regional economic development objectives.

- Goal One: Retain and expand existing businesses, and attract new businesses in the central Oklahoma region.
- Goal Two: Coordinate economic development efforts with regional partners.
- Goal Three: Develop, retain, and attract talent.
- Goal Four: Enhance and promote quality of place.

While each of these goals was chosen for its ability to leverage distinct opportunities in central Oklahoma, they were also intentionally chosen for their ability to support one another.

During the course of the last decade, the four county region (including Oklahoma, Cleveland, Canadian, and Logan Counties) experienced a population increase of 14.3% which significantly exceeds the national average. In 2010, the region's total population was approximately 1.1 million, an increase of 142,000 since the 2000 Census. A distribution of the population by age reveals that people living in the four-county region are, on average, younger than their statewide and national counterparts. In-migration of young professionals continues to increase, which represents a reversal of historic trends. In the last ten (10) years, the ACOG region has experienced a net gain of almost 63,000 jobs. The regional absorbed a net decrease in jobs only twice in the previous decade, both during a national recession.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	7,502	15,068	4	6	2
Arts, Entertainment, Accommodations	26,727	33,249	14	12	-2

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Construction	11,206	15,833	6	6	0
Education and Health Care Services	36,884	55,034	20	20	0
Finance, Insurance, and Real Estate	15,232	21,714	8	8	0
Information	5,188	8,507	3	3	0
Manufacturing	15,443	22,535	8	8	0
Other Services	6,491	9,051	3	3	0
Professional, Scientific, Management Services	16,991	27,651	9	10	1
Public Administration	0	0	0	0	0
Retail Trade	26,889	34,771	14	13	-1
Transportation and Warehousing	5,916	10,148	3	4	1
Wholesale Trade	11,406	19,914	6	7	1
Total	185,875	273,475	--	--	--

Table 43 - Business Activity

Data Source: 2007-2011 ACS (Workers), 2011 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	295,351
Civilian Employed Population 16 years and over	275,998
Unemployment Rate	6.55
Unemployment Rate for Ages 16-24	20.65
Unemployment Rate for Ages 25-65	4.15

Table 44 - Labor Force

Data Source: 2007-2011 ACS

Occupations by Sector	Number of People
Management, business and financial	63,328
Farming, fisheries and forestry occupations	12,450
Service	28,334
Sales and office	72,591
Construction, extraction, maintenance and repair	29,488
Production, transportation and material moving	15,388

Table 45 – Occupations by Sector

Data Source: 2007-2011 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	210,028	79%
30-59 Minutes	47,177	18%
60 or More Minutes	7,036	3%
Total	264,241	100%

Table 46 - Travel Time

Data Source: 2007-2011 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	26,738	2,484	15,503
High school graduate (includes equivalency)	51,253	4,490	20,052
Some college or Associate's degree	72,799	3,880	18,506

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Bachelor's degree or higher	73,063	1,786	11,783

Table 47 - Educational Attainment by Employment Status

Data Source: 2007-2011 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	2,854	6,446	5,241	7,607	4,741
9th to 12th grade, no diploma	9,458	8,361	6,173	10,902	6,630
High school graduate, GED, or alternative	17,527	20,844	18,836	36,372	19,515
Some college, no degree	20,837	22,686	18,252	35,609	15,973
Associate's degree	2,013	6,106	4,959	8,619	2,163
Bachelor's degree	4,896	19,142	15,063	25,145	8,873
Graduate or professional degree	275	6,493	6,479	15,339	6,158

Table 48 - Educational Attainment by Age

Data Source: 2007-2011 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	17,946
High school graduate (includes equivalency)	24,318
Some college or Associate's degree	31,004
Bachelor's degree	44,075
Graduate or professional degree	56,672

Table 49 – Median Earnings in the Past 12 Months

Data Source: 2007-2011 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Based on the data populated in the above table, as well as in the 2013 ACS 1-year estimates, the Education and Health Care services sector provides the largest percentage of the total jobs in Oklahoma City (approximately 20%). Retail trades are the second largest business sector at 12.7% of all jobs, followed by Arts, Entertainment and Accommodations at 12.2%. It should be noted that no jobs are reported under Public Administration in Table 43 above. This is most certainly an error as Public

Administration jobs account for approximately 7% of all jobs according to the 2013 ACS. As Oklahoma's largest city, and home to the Oklahoma state capitol, government jobs in Oklahoma City are plentiful.

Describe the workforce and infrastructure needs of the business community:

Oklahoma City's unemployment rate has remained relatively low during the recent recession in comparison to other parts of the country. The unemployment rate of 6.55% reflected in the above table from the 2007-2011 ACS, actually declined to 3.6% in December 2014 according to the local area unemployment statistics released by the Bureau of Labor Statistics.

According to the 2012 CEDS prepared by ACOG for the central Oklahoma region, two primary obstacles exist to the region's emergence as a national talent magnet based upon their stakeholder interviews. The first is that local wage rates lag the nation, making it more difficult to attract professional and technical talent in key fields. Secondly, there remains a persistent national misperception about the state's quality of life that hinders its attractiveness.

An *Employment Land Study Needs Assessment and Action Plan* was prepared by ECONorthwest in June 2012 on behalf of the City. This study found that although the city limits are large and much land is undeveloped, little land is serviced or consolidated in large sites suitable for industry (50 to 100 acres). Obstacles affecting the supply of development ready land include:

- Parcelization: Land may be vacant but in small parcels with multiple owners.
- Lack of infrastructure. That lack is not absolute, but most sites evaluated need some service extensions or upgrades, and the estimate cost to cure is very high.
- Market conditions: Property owners and developers are often reluctant to hold and develop land for industrial uses. Land suitable and even zoned for industrial development has frequently been permitted to develop for other commercial or residential uses. This often exacerbates the loss by creating conflicts from incompatible uses.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

Oklahoma City is experiencing a building boom with multiple projects recently completed, underway and planned for the near future. Both residential and commercial development projects are slated for completion during the five (5) year consolidated plan period that will significantly affect the local economy in terms of jobs created, population growth, tourism, and business activity. Major development projects announced and underway include a twenty-five story headquarters for Oklahoma Gas Energy Company (OG&E) at the southeast corner of Sheridan and Walker Avenues, coupled with a twenty-six (26) story residential tower on the same block. A twenty-seven (27) story office building has been approved for construction at 499 E. Sheridan immediately adjacent to the OG&E development.

Construction of a GE Research center in eastern Oklahoma City is expected to be completed in 2015, and will provide a new global research hub for oil & gas technology innovation. Also on the east side of the city, a 195 room Embassy Suites hotel was opened in March 2015, resulting in the addition of approximately seventy-one (71) FTE jobs. A new TIF District has been approved along Northeast 23rd Street between I-235 and the Oklahoma River. A new grocery store is planned for the area, along with proposals for renovation of the Page Woodson School into a mixed use development.

Multiple projects are under construction or recently completed in the Bricktown entertainment district, including a 39,000 square foot concert venue which broke ground in March 2015, a 126 room Holiday Inn Express opened in March 2015, a 126 unit Springhill Suites hotel, and the 250 unit Steelyard Apartments which also includes 17,000 square feet of retail space.

The Civic Center Lofts project will provide thirty-four (34) market rate condominium units and is under construction in the Arts District. In the historic Film Row District, the Fred Jones manufacturing plant constructed in 1916 is being converted into a 135 unit 21C Museum Hotel which will create 138 FTE jobs.

In addition to the City's ongoing formula grant activities, local efforts have been undertaken to address economic need. The citizens of Oklahoma City passed a third Metropolitan Area Projects (MAPS) tax referendum that builds on local investments in public facilities initiated in the early 1990's. The first two MAPS programs were focused on construction and renovation of public facilities that include numerous public school buildings, sports arenas, libraries, river dams, a canal, and fairground improvements, among others. The third initiative, approved in 2009, is steadily progressing. Site selection and solicitation of an anchor hotel to support a new convention center is underway. Consultants are in the process of completing conceptual plans. Project completion is estimated in 2019. The land for a new central city Core to Shore Park has been assembled and development is expected to start in summer 2015. The seventy (70) acre park is envisioned to encourage healthier lifestyles and provide new entertainment options. City Council has approved a Master Plan and the environmental assessment has been completed. An electric rail-based streetcar system will serve the downtown vicinity. Construction of the 4.5 mile phase I is expected to begin in 2016. The Santa Fe Railroad station was acquired for use as an intermodal transit hub. Architectural design and engineering are underway. The combined local investment in public facilities for the three MAPS programs totals over \$1.8 billion.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

Without a doubt, Oklahoma City's higher education assets are a major advantage in developing skills and talent for the local workforce. It is however important to note that many recent graduates continue to pursue occupational opportunities in other regions, particularly in the Tulsa and Dallas-Fort Worth metropolitan areas. National demographic trends, most notably the aging of baby boomers, suggest that demand for workers may soon exceed the supply. As a result, competition for labor is expected to

increase among local companies, as well as other urban communities. The City of Oklahoma City continues to focus on the development, attraction and retention of labor, primarily through the management of economic development revolving loan funds, which are funded with CDBG dollars.

There continues to be a shortage of skilled workers in occupations requiring technical skills. This is true for both blue and white collar industries.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

The City continues to fund the Community Action Agency (CAA) small business assistance program to support job training activities. The City has also funded a new program using 2014 CDBG funds to support the development of a small business and microenterprise revolving loan fund program. The Commercial District Revitalization Program-Business (CDRP-B) fund has been implemented to support businesses in the City's Commercial District Revitalization Program areas and/or other priority revitalization districts.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDs)?

Yes

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

The City of Oklahoma City collaborates with the Association of Central Oklahoma Governments (ACOG) to identify activities, development projects, and business creation opportunities that aligns with the regional goals of the CEDs. Specific CEDs initiatives can be reviewed at the following link:

www.acogok.org/websites/acogok/images/downloads2014/completecoceds.pdf

Activities funded with CDBG funds directly support revolving loan funds for small business expansions and start-ups. The City continues to seek opportunities for land and parcel assemblage and infrastructure improvements to promote the development of large business and industrial sites for future businesses.

Discussion

At the time of Plan submission, a slowdown in the oil and gas industry attributed to a global decrease in the price of crude was beginning to affect the local economy. Recent layoffs have been experienced at both large and small scale oil companies. It is unknown whether prices will stabilize or if further workforce reductions will be required. Thanks to a multitude of factors, including a strong higher education presence, a burgeoning regional medical center, growing global energy demand, and continued civic investments in the urban core, the region appears poised to continue positive economic growth over the term of this Consolidated Plan in spite of this recent anomaly. At the present time, the oil and gas concerns have not impacted other areas of the local economy and new development continues at a rapid pace. As the local economic picture becomes clearer, annual economic development goals will be re-evaluated to ensure that resources are targeted appropriately.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

The City defines "concentration" as those Census tracts that have percentages of housing problems that exceed the city-wide average. The 2013 American Community Survey (ACS) 1-year estimate identifies physical housing characteristics for occupied housing units. It is noted in the ACS that approximately 0.3% of owner-occupied units and 0.8% of renter-occupied units City wide lack complete plumbing facilities. The ACS also reflects that 0.7% of owner-occupied units and 1.1% of renter-occupied units are without complete kitchen facilities.

The 2009-13 ACS Survey 5-year estimates provides information on units with one (1) of four (4) identified housing conditions. These conditions include a.) Lacking complete plumbing facilities, b.) Lacking complete kitchen facilities, c.) Housing with more than one occupant per room, and/or d.) Monthly owner costs or gross rent as a percentage of household income in excess of 30%.

The ACS indicates that of 135,285 **owner-occupied** housing units, 22.3% have one selected condition, .62% have two selected conditions, and .04% have three selected conditions. None were noted with four (4) or more selected conditions. The data reflects that renter households experience substandard conditions in greater proportion than homeowners with 45.8% reporting at least one selected condition, 2.97% with two selected conditions, .14% with three selected conditions and a very small portion (6 units of 92,381 rental households) reporting all four (4) selected conditions.

It is unknown, based upon the data available, where the deficient units are located or if a disparate concentration of substandard housing exists. Anecdotally, it has been noted that neighborhoods located in the northeast and southwest quadrants of the City appear to be in greater need of maintenance and repair than those in other areas of the City, as local real estate market data would suggest. The goals and priorities of this Consolidated Plan have prioritized rehabilitation of older housing stock within the NRSA, which includes the urban core. In addition, a vacant and abandoned building committee has been formed to address non-occupied structures that create nuisance and safety issues within the community. No ACS or Census data is available to identify the condition of vacant housing units.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

The City of Oklahoma City defines "concentration" of minorities as those Census tracts in which the percentage of minorities exceeds the citywide average. The Black and African American population changed little as a share of the city's overall population during the last Consolidated Plan period; however they remain disproportionately concentrated in Census tracts to the east and northeast of the

city center. As the Hispanic population grew in absolute numbers and as a share of the population, the number of Census tracts with high concentrations of Hispanic residents also grew. However, such tracts tended to be located next to tracts with relatively high shares of Hispanic residents in the 2000 Census, which are clustered to the southwest and west of the downtown area.

What are the characteristics of the market in these areas/neighborhoods?

Homes in Census tracts with large concentrations of minorities, low income households, and households with housing problems are generally concentrated in the northeast and southwest quadrants of the City. Property values and market rents tend to be lower for similar sized homes than in other areas of the City. Lack of sidewalks, aging infrastructure and deferred maintenance are common in lower income areas. These areas also tend to have greater numbers of vacant lots and buildings.

Are there any community assets in these areas/neighborhoods?

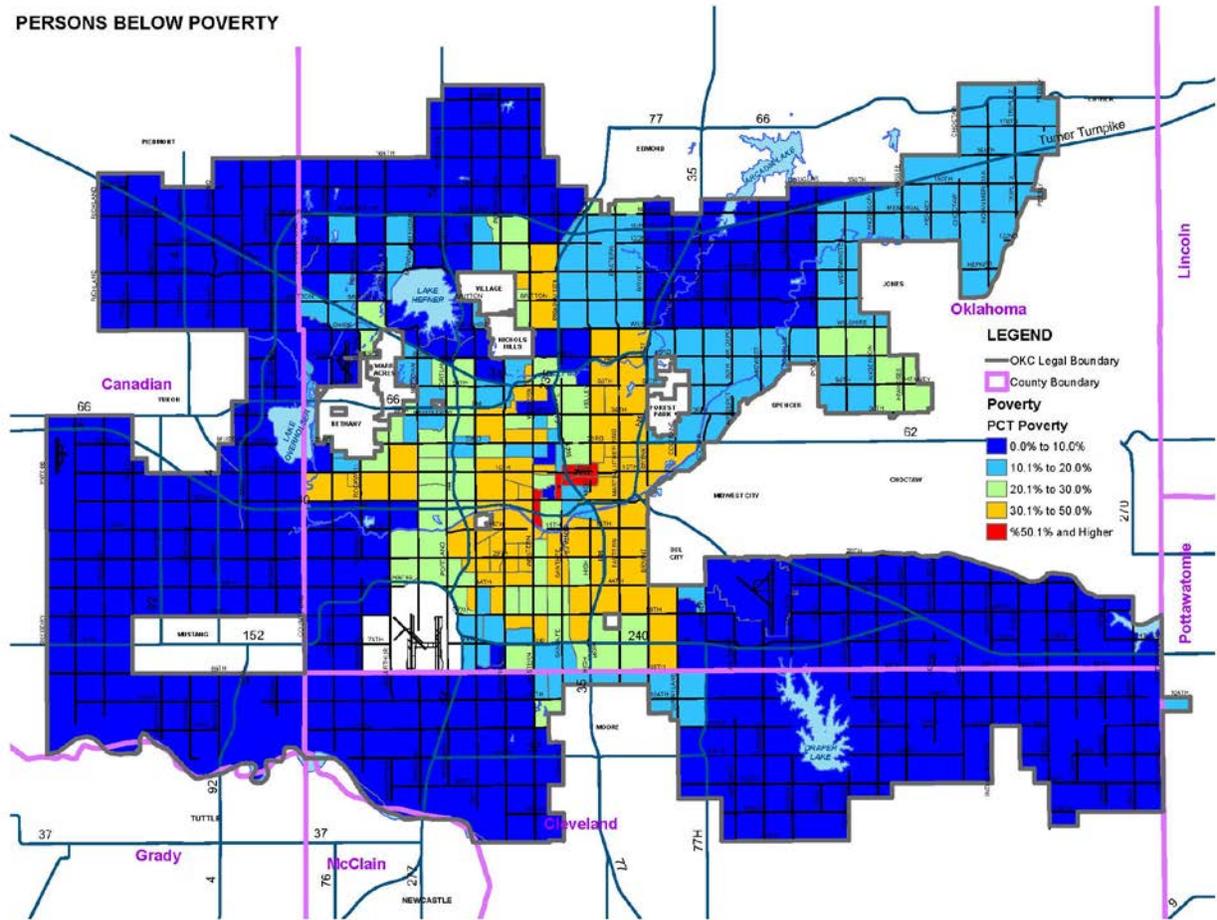
The City has recently approved a new TIF district along the Northeast 23rd Street corridor between I-235 and Sooner Road, with a new grocery store slated for development. A proposed redevelopment of the historic Page Woodson School in NE Oklahoma City to a mixed-use development would preserve a community landmark and serve as a catalyst for future neighborhood revitalization when completed. In the southwest quadrant, a new mixed-use/mixed-income development is planned near Wheeler Park which will serve as an economic development tool and catalyst for revitalization if successful.

Two (2) of the three (3) SNI neighborhoods are located in predominately minority neighborhoods. The City's SNI efforts have included partnerships with local schools to provide after school programming, neighborhood led infrastructure projects, tree planting and beautification projects, and corporate sponsorships to address needs in these communities. Although not all of these assets can be measured monetarily, there has been a significant contribution of human resources and investment of volunteer labor to support initiatives in these targeted communities.

Are there other strategic opportunities in any of these areas?

As planned MAPS 3 activities move towards completion, it is anticipated that City transportation services will be improved to provide evening and weekend service, and additional bus and streetcar routes will be added where feasible. Infill opportunities still abound in all areas of the City, and it is anticipated that new development proposals will be received for projects in underserved areas of the City. As Bricktown and development in the Health Sciences area expands, the City will continue to inc

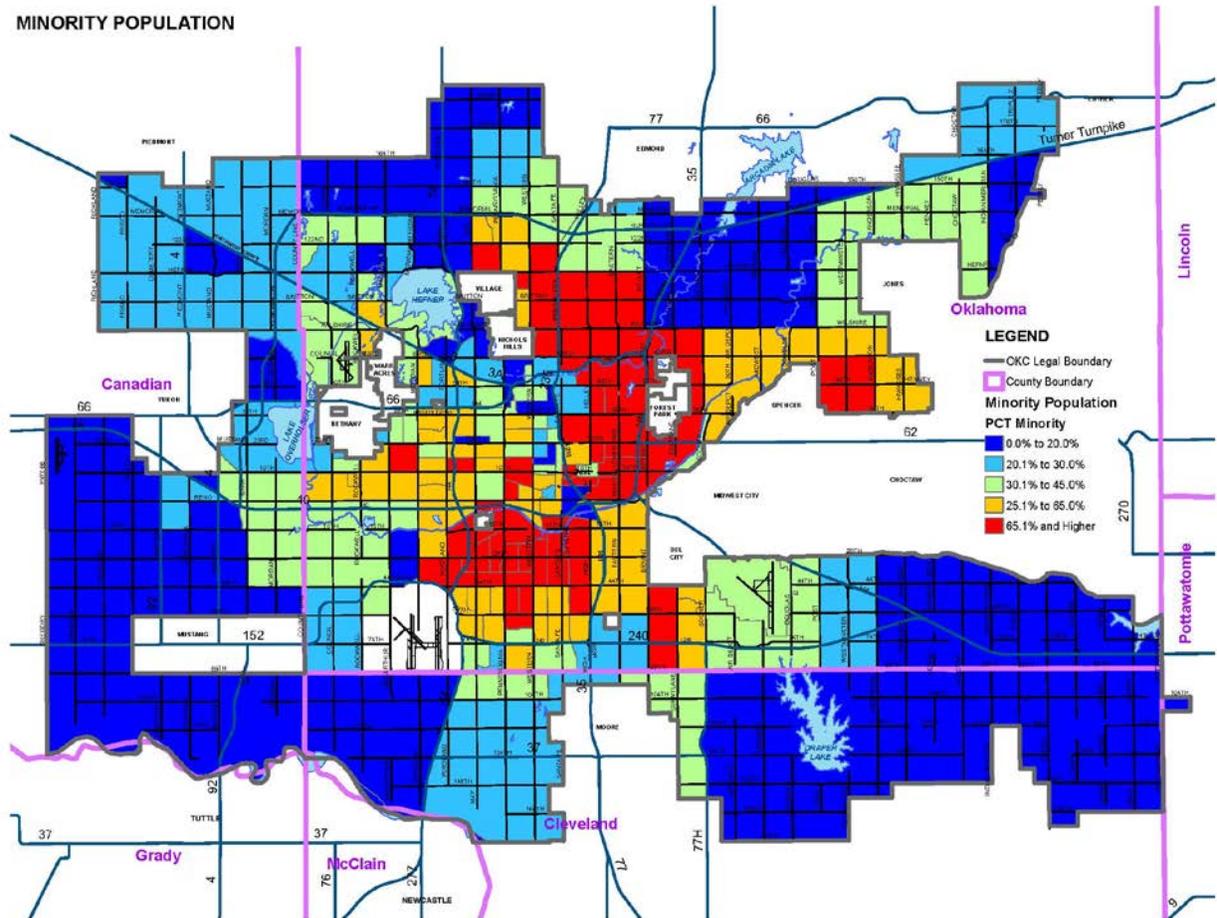
PERSONS BELOW POVERTY



entivize and subsidize proposals that provide benefit to impoverished neighborhoods.

Poverty Rates

MINORITY POPULATION



Minority Concentration

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Consolidated Plan describes how the City of Oklahoma City plans to provide new or improved availability, affordability, and sustainability of decent housing; a suitable living environment; and economic opportunity, principally for extremely low and low-income residents. The priority needs established in this Plan were developed through review and analysis of CHAS, Census, and ACS data. Input was also received from consultations with service providers, citizen participation meetings, and analysis of the Housing Needs Assessment and Housing Market Analysis data presented earlier in this report. The priorities that address housing, services for the homeless, non-homeless special needs populations, and community development needs are prioritized based upon documented need and funding expectations during the five (5) year Consolidated Plan period.

In general, the needs identified in the Consolidated Plan primarily focus on the development and rehabilitation of housing for low-income and extremely low-income families, services for the homeless, creation of economic opportunities, and improvement of quality of life through public facilities improvements and public service activities. Goals include the creation and retention of affordable rental housing units for special needs populations, persons transitioning from homelessness, the elderly and families. Homeownership remains a priority goal and funding for both development and homebuyer down payment assistance is supported.

Plan priorities that relate to the homeless and persons with special needs, including persons with HIV/AIDS, are focused on program activities designed to provide housing and supportive services to underserved populations. Lastly, the community and economic development goals address needed public facilities improvements and public services. Resources are primarily targeted in low-income neighborhoods to remedy problems with blight and neighborhood decay, and to encourage business development and job creation by improving access to capital through small business lending programs.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Table 50 - Geographic Priority Areas

1	Area Name:	NEIGHBORHOOD STRATEGY AREA
	Area Type:	Strategy area
	Other Target Area Description:	
	HUD Approval Date:	6/21/2006
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	<p>The City of Oklahoma City applied for and received a 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 (outlined in orange on the attached map). In addition, the NRSA contains approximately 20 square miles that lie within an area designated by HUD as Empowerment Zone (Round III). Post expiration in December 2009, this designation was renewed until December 31, 2014. 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 NRSA has a poverty rate of 34.2%, double the 17.3% poverty rate of the City as a whole.</p> <p>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.</p>

<p>Include specific housing and commercial characteristics of this target area.</p>	<p>The NRSA has a vacancy rate nearly double that of the City as a whole. In addition, renter-occupied housing accounts for a disproportionate amount of units in relation to other areas of the city. Aging housing stock and deferred maintenance, along with large numbers of vacant and abandoned properties, create significant problems for NRSA residents. Crime rates in many NRSA neighborhoods are much higher than in other areas of the community. Commercial opportunities do exist, but will require development partners who are willing to assume short term risk in exchange for long term benefit. Most neighborhoods within the NRSA experience high concentrations of poverty which exacerbates social problems associated with limited opportunity.</p>
<p>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</p>	<p>The NRSA comprises approximately 29.5 square miles of the central portion of Oklahoma City. Since designation as an NRSA, the City has continued to expend the majority of federal funds in this strategically targeted area to benefit the highest concentrations of low income residents. The NRSA received its designation based in part on the general indicators of need documented in this narrative; its geographic location encompassing much of the central city; and its concentration of lower income residents. As a result the 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.</p>
<p>Identify the needs in this target area.</p>	<p>Many of the low and moderate income areas contained in the traditional neighborhood developments within the NRSA suffer from high poverty rates, high vacancy rates, deferred property maintenance, and lower rates of home ownership.</p>

	<p>What are the opportunities for improvement in this target area?</p>	<p>Many of the low and moderate income areas within the NRSA fall in the Traditional Neighborhoods designation on the City of Oklahoma City's Comprehensive Plan development map. Traditional neighborhoods are characterized as consisting of residential and commercial areas that are thirty (30) years of age or older. Opportunities exist for the creation and development of mixed income neighborhoods to encourage the deconcentration of poverty. Opportunities also exist for funding down payment assistance programs to encourage homeownership in neighborhoods that are predominately occupied by renters.</p>
	<p>Are there barriers to improvement in this target area?</p>	<p>Local and federal resources are insufficient to address all needs, even those of the highest priority. The NRSA has the largest rental vacancy rate in the City. Developers may be unwilling to invest in these low income areas until the market has been tested and firmly established. Many developers are hesitant to comply with the City's desired goal of mixed-income housing and have indicated that all units must be market rate to generate positive cash flow. Affordable and mixed-income projects will most likely require subsidy to incentivize development.</p>
2	<p>Area Name:</p>	<p>Strong Neighborhoods Initiative</p>
	<p>Area Type:</p>	<p>Local Target area</p>
	<p>Other Target Area Description:</p>	
	<p>HUD Approval Date:</p>	
	<p>% of Low/ Mod:</p>	
	<p>Revital Type:</p>	<p>Comprehensive</p>
	<p>Other Revital Description:</p>	

<p>Identify the neighborhood boundaries for this target area.</p>	<p>Area 1: Classen Ten Penn - Gatewood</p> <p>The Classen Ten Penn – Gatewood target area is generally bounded, starting on the North and moving counter-clockwise, by Northwest 17th Street, North Blackwelder Avenue, Northwest 10th Street, North Western Avenue and North Classen Boulevard. Target area landmarks include McKinley Park, Eugene Field Elementary School, Classen School of Advanced Studies and the Plaza District. Neighborhood organizations in this area include the Classen Ten Penn Neighborhood Association, the Gatewood Neighborhood Association and the Plaza District Association.</p> <p>Area 2: Classen’s North Highland Parked - Lincoln Terrace</p> <p>The Classen’s North Highland Parked - Lincoln Terrace target area is generally bounded, starting on the North and moving counter-clockwise, by Northeast 16th Street, Northeast 16th Place, North Walnut Avenue, Northeast 13th Street and North Lincoln Boulevard. Target area landmarks include the Harn Homestead, Capitol Park and the Walcourt Building. Neighborhood organizations in this area include the Classen’s North Highland Parked Neighborhood Association, the Lincoln Terrace Neighborhood Association and the Medical Center – Capitol Area Coalition.</p> <p>Area 3: Culbertson’s East Highland</p> <p>The Culbertson’s East Highland target area is generally bounded, starting on the North and moving counter-clockwise, by Northeast 16th Street, Martin Luther King Boulevard, NE 8th Street, and NE Lottie Street. Target area landmarks include Moon Academy, KIPP Reach Academy and John F. Kennedy Park. Neighborhood organizations in this area include the Culbertson’s East Highland Neighborhood Association.</p>
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<p>Include specific housing and commercial characteristics of this target area.</p>	<p>All three (3) targeted neighborhoods primarily consist of older single family residential homes of various ages and architectural styles. Homes have been constructed over several decades and are representative of the era in which they were built. Commercial activity immediately surrounding the SNI neighborhoods is limited; however, infill opportunities for mixed-use development are plentiful. All neighborhoods in the target areas have experienced disinvestment in recent years, but have been identified for revitalization by the City due to their strategic locations, active neighborhood associations, proximity to jobs and services, and potential for positive growth with significant local support.</p>
<p>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</p>	<p>The process to select SNI neighborhoods began in 2010 and extended over several program years. The final selection of neighborhoods was made in early 2013. The City’s Planning Department used neighborhood conditions data, citizen group participation, community leadership evaluation, housing conditions surveys and other analysis to identify a small number of areas to consider for targeted revitalization. Priority was given to areas that were experiencing decline, but were adjacent to stable neighborhoods and/or commercial districts and close to employment centers and transit. The City Council’s Neighborhood Conservation Committee made the final selection of three areas based on the research findings and recommendations of the Planning Department.</p>
<p>Identify the needs in this target area.</p>	<p>The primary needs in the SNI neighborhoods are infill development, demolition and/or remediation of vacant and abandoned buildings, housing options for all income ranges, rehabilitation of older housing stock, improved infrastructure, park improvements, educational opportunities for youth, and legal assistance for homeowners to clear title issues. All of these activities are recommended for funding in this Consolidated Plan.</p>

<p>What are the opportunities for improvement in this target area?</p>	<p>Opportunities for improvement in the SNI neighborhoods are plentiful. Elimination of blight, resolution of issues related to absentee owners, partnerships with local schools, and improved infrastructure have all been identified as strategic goals of the program. New housing construction and mixed use development opportunities are prioritized.</p>
<p>Are there barriers to improvement in this target area?</p>	<p>As noted above, ownership issues related to title can be a barrier to real estate transactions and prevent access to mortgage resources for home improvements. Some issues have arisen in which property owners are unwilling to repair a property and bring it up to code, but are also unwilling to sell it. Competing development goals between the public and private sectors have also proven to be problematic, specifically in terms of desired design standards.</p>

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The City of Oklahoma City allocates approximately 80% of its CDBG and HOME funds to activities within the Neighborhood Revitalization Strategy Area (NRSA), and whenever possible within the three (3) targeted Strong Neighborhoods Initiative (SNI) designated neighborhoods. The remaining 20% of funds may be allocated outside the NRSA boundaries. Funding is highly concentrated within the NRSA to ensure a strategic targeting of scarce resources, and to provide a comprehensive approach to revitalization. The scattering of resources over the entire metropolitan area is discouraged due to the minimal community benefit realized through isolated investment.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 51 – Priority Needs Summary

1	Priority Need Name	Quality of Affordable Owner Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly
	Geographic Areas Affected	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Associated Goals	Whole-House Rehabilitation-HOME Exterior Maintenance and Storm Shelters-CDBG Emergency Repairs-CDBG Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Description	Provide HOME and CDBG funding to extremely low and low-income households for whole house rehabilitations, exterior maintenance code issues, and emergency repairs to address imminent threats to life, health or safety.
	Basis for Relative Priority	The City continues to place a high priority on homeownership and sustainability, with special emphasis on neighborhoods targeted for revitalization.
	2	Priority Need Name
Priority Level		High
Population		Low Moderate Large Families Families with Children Elderly
Geographic Areas Affected		NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative

	Associated Goals	Downpayment and Closing Costs Assistance-HOME CHDO New Construction/Rehab- HOME Affordable Housing-AHDP and RHP- CDBG and HOME
	Description	Provide Downpayment assistance to low income families using HOME funds.
	Basis for Relative Priority	The City promotes homeownership opportunities and encourages mixed-income housing in all communities. ACS data reflects the median sales price of homes in the metropolitan area (\$129,300) remains out of reach for 48.8% of households earning less than 80% of the area median income.
3	Priority Need Name	Supply of Affordable Owner-Occupied Housing
	Priority Level	High
	Population	Low Moderate Large Families Families with Children Elderly
	Geographic Areas Affected	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Associated Goals	CHDO New Construction/Rehab- HOME
	Description	Provide HOME funding for new construction or rehabilitation of existing housing units through Community Housing Development Organizations (CHDO's) and non-profit housing providers.
	Basis for Relative Priority	The City promotes homeownership opportunities and encourages mixed-income housing in all communities. ACS data reflects the median sales price of homes in the metropolitan area (\$129,300) remains out of reach for 48.8% of households earning less than 80% of the area median income. The City also prioritizes sustainability in ensuring that assistance is made available for rehabilitation to income-qualified households as resources allow.
4	Priority Need Name	Supply of Affordable Rental Housing
	Priority Level	High

	Population	Extremely Low Low Moderate Large Families Families with Children Elderly
	Geographic Areas Affected	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Associated Goals	Multi-Family Rehab- CDBG Rental Housing Construction- HOME
	Description	Provided CDBG and HOME funding for the rehabilitation of multi-family rental units.
	Basis for Relative Priority	Rehabilitation of multifamily rental units is an increasing need expressed by citizens in the community through the public participation process.
5	Priority Need Name	Quality of Public Housing
	Priority Level	High
	Population	Extremely Low Low Public Housing Residents
	Geographic Areas Affected	
	Associated Goals	Rehabilitation of Public Housing Units- CDBG
	Description	Provide CDBG funding for the rehabilitation of public housing units owned and operated by the Oklahoma City Housing Authority.
	Basis for Relative Priority	The Oklahoma City Housing Authority continues to see a decline in the annual HUD appropriation for capital improvements (30% decrease since 2010). The City is committed to providing CDBG funding to assist in the rehabilitation of public housing units; although resources are limited.
6	Priority Need Name	Supply of Affordable Housing - AHDP and RHP
	Priority Level	High

	Population	Extremely Low Low Moderate Large Families Families with Children Elderly
	Geographic Areas Affected	NEIGHBORHOOD STRATEGY AREA
	Associated Goals	Affordable Housing-AHDP and RHP- CDBG and HOME
	Description	Provide HOME and CDBG funds to increase the supply of affordable housing, to include loans for new homeownership project development, new construction of rental housing, or acquisition/rehab of non owner-occupied structures.
	Basis for Relative Priority	The Affordable Housing Development Program (AHDP) and Rental Housing Program (RHP) support the development of affordable housing projects, including homeownership units, construction of rental housing units, multifamily acquisition/rehab projects, and multifamily rental for families and seniors. The creation of additional affordable housing units and mixed-income neighborhoods remains a high priority for funding.
7	Priority Need Name	Supportive Housing for the Chronically Homeless
	Priority Level	High
	Population	Extremely Low Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Victims of Domestic Violence
	Geographic Areas Affected	
	Associated Goals	Housing for the Chronically Homeless- ESG

	Description	Provide permanent supportive housing and associated case management for chronically homeless populations.
	Basis for Relative Priority	When possible, the Oklahoma City Continuum of Care encourages use of the "Housing First" model with supportive case management and services to meet the immediate housing needs of the chronically homeless.
8	Priority Need Name	Services for Homeless Youth (Age 21 and under)
	Priority Level	High
	Population	Extremely Low Low Individuals Unaccompanied Youth
	Geographic Areas Affected	
	Associated Goals	Homeless Youth Facilities -ESG
	Description	Develop one Drop-in Center in each quadrant of the city and support development of a youth shelter.
	Basis for Relative Priority	Data suggests that an increasing need in the Oklahoma City area is homeless youth. Some are from homeless families while others have aged out of the foster care system and have nowhere to live after turning 18. Providing the necessary services and facilities for this population has been determined to be a high funding priority.
9	Priority Need Name	Sustainability of Transitional Housing
	Priority Level	High
	Population	Extremely Low Low Chronic Homelessness Individuals
	Geographic Areas Affected	
	Associated Goals	Housing Sustainability for the Homeless- ESG

	Description	Increase the percentage of previously homeless individuals staying in permanent housing for more than six (6) months by at least three percent (3%) annually.
	Basis for Relative Priority	The goal of transitional housing is not only to immediately house previously homeless individuals, but to also ensure that sufficient case management and support services are available to create an environment conducive to success. The City of Oklahoma City strives for a 3% annual improvement in the number of persons maintaining permanent housing for more than six (6) months.
10	Priority Need Name	Increased Employment Rate for CoC Participants
	Priority Level	Low
	Population	Extremely Low Low Chronic Homelessness Individuals
	Geographic Areas Affected	
	Associated Goals	Homeless Persons Employment- ESG
	Description	Increase the number of employed Continuum of Care program participants annually.
	Basis for Relative Priority	The Oklahoma City Continuum of Care will continue to fund activities that support employment opportunities for program participants.
11	Priority Need Name	Homeless Households with Children
	Priority Level	High
	Population	Extremely Low Low Chronic Homelessness Families with Children
	Geographic Areas Affected	
	Associated Goals	Homeless Households with Children- ESG

	Description	Using ESG funds, decrease the number of homeless households with children through rapid re-housing and prevention initiatives.
	Basis for Relative Priority	Decreasing the number of households with children has been identified as a high priority. ESG funds are targeted to activities that promote rapid rehousing for families.
12	Priority Need Name	Public Facilities, Services and Infrastructure
	Priority Level	Low
	Population	Extremely Low Low Moderate Non-housing Community Development
	Geographic Areas Affected	
	Associated Goals	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Description	Provide CDBG funding to assist neighborhoods by financing needed public facilities, infrastructure improvements and/or services in low and moderate income areas.
	Basis for Relative Priority	The City of Oklahoma City remains committed to supporting public facilities and public services for low and moderate income neighborhoods as resources allow. These activities are lower priority than housing and homelessness activities in which needs are much greater and immediate threats to life, health and safety are extant.
13	Priority Need Name	Strengthen Neighborhood Capacity
	Priority Level	Low
	Population	Extremely Low Low Moderate Non-housing Community Development
	Geographic Areas Affected	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative

	Associated Goals	Public Facilities, Srvcs, Infrastructure-SNI CDBG Neighborhood Capacity- CDBG
	Description	Assist neighborhood associations in organization of activities and implementation of CDBG eligible public facilities and public services.
	Basis for Relative Priority	The City of Oklahoma City remains committed to supporting public facilities and public services for low and moderate income neighborhoods as resources allow. These activities are lower priority than housing and homelessness activities in which needs are much greater and, immediate threats to life, health and safety are extant.
14	Priority Need Name	Acquisition/Clearance of Vacant, Blighted Property
	Priority Level	Low
	Population	Extremely Low Low Moderate Non-housing Community Development
	Geographic Areas Affected	
	Associated Goals	Aid Blighted, Vacant, Underutilized Property-CDBG
	Description	Provide CDBG funding for the acquisition and clearance of blighted properties.
	Basis for Relative Priority	The City of Oklahoma City remains committed to supporting public facilities and public services for low and moderate income neighborhoods as resources allow. These activities are lower priority than housing and homelessness activities in which needs are much greater and immediate threats to life, health and safety are extant.
15	Priority Need Name	Public Services-Graffiti Removal
	Priority Level	Low
	Population	Extremely Low Low Moderate Non-housing Community Development

	Geographic Areas Affected	
	Associated Goals	Graffiti Removal-CDBG
	Description	Provide CDBG funding to eliminate graffiti in low and moderate income neighborhoods.
	Basis for Relative Priority	The City of Oklahoma City remains committed to supporting public facilities and public services for low and moderate income neighborhoods as resources allow. These activities are lower priority than housing and homelessness activities in which needs are much greater and immediate threats to life, health and safety are extant.
16	Priority Need Name	Address Slum and Blight- Vacant Abandoned Bldgs
	Priority Level	Low
	Population	Extremely Low Low Moderate Non-housing Community Development
	Geographic Areas Affected	
	Associated Goals	Secure Vacant and Abandoned Properties- CDBG
	Description	Provide CDBG funding for interim assistance to secure vacant and abandoned properties on a spot basis.
	Basis for Relative Priority	The City of Oklahoma City remains committed to supporting public facilities and public services for low and moderate income neighborhoods as resources allow. These activities are lower priority than housing and homelessness activities in which needs are much greater and immediate threats to life, health and safety are extant.
17	Priority Need Name	Economic Opportunities for Low and Moderate Income
	Priority Level	Low

	Population	Extremely Low Low Moderate Non-housing Community Development
	Geographic Areas Affected	
	Associated Goals	Small Business Technical Assistance- CDBG Small Business Revolving Loan Fund- CDBG Urban Renewal Title Transfer and Disposition- CDBG Section 108 Loan Assistance- CDBG Empowerment Zone Staffing- CDBG
	Description	Provide CDBG Technical Assistance (TA) for small businesses, Provide revolving loan fund (RLF) assistance to create jobs and expand commercial services, Provide CDBG funding for title transfer and disposition of Urban Renewal properties, Apply for Section 108 funds as opportunities arise, and promote and continue to staff the continued implementation of the Empowerment Zone designation if the program is extended beyond December 31, 2014.
	Basis for Relative Priority	The City of Oklahoma City remains committed to supporting public facilities and public services for low and moderate income neighborhoods as resources allow. These activities are lower priority than housing and homelessness activities in which needs are much greater and immediate threats to life, health and safety are extant.
18	Priority Need Name	Transportation Options -Special Needs Population
	Priority Level	Low
	Population	Extremely Low Low Moderate Elderly Frail Elderly Persons with Physical Disabilities Non-housing Community Development
	Geographic Areas Affected	
	Associated Goals	Special Needs Transportation Services-CDBG

	Description	Improve the accessibility of public transportation for low and moderate income persons with special needs.
	Basis for Relative Priority	The City of Oklahoma City remains committed to supporting public facilities and public services for low and moderate income neighborhoods as resources allow. These activities are lower priority than housing and homelessness activities in which needs are much greater and immediate threats to life, health and safety are extant.
19	Priority Need Name	Housing Availability-Persons With HIV/AIDS
	Priority Level	High
	Population	Extremely Low Low Moderate Persons with HIV/AIDS and their Families
	Geographic Areas Affected	
	Associated Goals	STRMU for Persons with HIV/AIDS- HOPWA TBRA for Persons with HIV/AIDS- HOPWA
	Description	Increase the range of housing options for persons with HIV/AIDS using HOPWA funding. Provide Short-Term Rent, Mortgage and Utility (STRMU) assistance and Tenant Based Rental Assistance (TBRA) to eligible households.
	Basis for Relative Priority	The provision of STRMU and TBRA assistance to persons with HIV/AIDS is important to ensure equitable housing access for this special needs population. Programs are funded using HOPWA dollars which are expected to remain consistent over the life of the Consolidated Plan.
20	Priority Need Name	Sustainability Service Provider Facilities-CDBG
	Priority Level	Low
	Population	Extremely Low Low Moderate Families with Children Non-housing Community Development Other

	Geographic Areas Affected	
	Associated Goals	Sustainability-Social Services Provider Facilities
	Description	Provide CDBG funding to support the renovation and expansion of service provider facilities for non-profit organizations.
	Basis for Relative Priority	The City of Oklahoma City remains committed to supporting public facilities and public services for low and moderate income neighborhoods as resources allow. These activities are lower priority than housing and homelessness activities in which needs are much greater and immediate threats to life, health and safety are extant.
21	Priority Need Name	Administration
	Priority Level	Low
	Population	Elderly Public Housing Residents Other
	Geographic Areas Affected	
	Associated Goals	Administration
	Description	CDBG and HOME funding for Administrative support and program operations.
	Basis for Relative Priority	Funding for administration is necessary to facilitate ongoing management and administration of formula grant programs. Administrative funds are used for staff support and program operations to ensure that CDBG, HOME, ESG, and HOPWA funds are allocated, tracked, disbursed and monitored in compliance with federal regulations.

Narrative (Optional)

The City of Oklahoma City has adopted strategies related to the provision of safe, decent affordable housing for all residents of the community with a particular focus on low and moderate income families. The City also strives to end homelessness by moving individuals and families from homelessness to permanent housing utilizing local and federal resources. Available funding includes the Continuum of Care (CoC) and Emergency Solutions Grant (ESG) allocations. CoC and ESG funding increases housing

opportunities and provides associated case management support to help program recipients maintain permanent housing. Lastly, the City strives to reduce the risk of homelessness for persons living with HIV/AIDS in the Oklahoma City area using federal funds available under the Housing Opportunities for Persons With Aids (HOPWA) program.

The City strives to provide a safe and suitable living environment with adequate public facilities and services to ensure a high quality of life in all areas of the community, with particular focus on low and moderate income areas. In addition, the City of Oklahoma City seeks to expand economic opportunities by providing financial resources and technical assistance to assist businesses in creating jobs and providing retail and commercial services with particular focus in the Neighborhood Revitalization Strategy Area (NRSA). Special needs populations are assisted with expanded transportation options to improve accessibility of needed services, and to improve quality of life.

The provision of affordable housing remains the highest priority. Priority is assigned to housing needs based on the amount of federal funds available, unmet needs identified in the preceding Housing Needs Assessment, focus on homeownership, and leveraging of non-federal funds through private investment. Housing goals have been assigned a higher priority than non-housing community development activities based on immediate threats to the life, health and safety of low and moderate income families. Other housing criteria considered in the designation of activities as high priority include the following:

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

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Tenant Based Rental Assistance is not an activity proposed for HOME funding during the term of the 2015-2020 Consolidated Plan. Some TBRA assistance is provided to persons with special needs using HOPWA funding. There are presently 18,310 renter households below 50% of the Area Median Income experiencing a housing cost burden in excess of 50%. A decrease in Section 8 funding to the Oklahoma City Housing Authority would immediately create a significant increase in demand for TBRA support.
TBRA for Non-Homeless Special Needs	Tenant Based Rental Assistance is available from HOPWA funds on a limited basis for persons with special needs. Funding is limited for this activity.
New Unit Production	Only 65.8% of rental units are affordable to households at 80% of Area Median Income (AMI). This decreases to 28% for families at 50% AMI, and only 6.3% for households at or below 30% AMI. Median home values have increased by 66% since the 2000 Census and median contract rents have increased by 39% over that same time frame. Affordable housing units cannot be developed fast enough to meet demand. New unit production is the highest identified priority.

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Rehabilitation	<p>As noted in the Housing Market Analysis section, an aging housing stock indicates an increasing need for rehabilitation programs. 54% of owner-occupied units and 63% of rental units were constructed prior to 1980. 24% of owner-occupied units and 48% of rental units have at least one substandard condition (Lack of adequate plumbing, lack of adequate kitchen facility, overcrowding, and/or a cost burden in excess of 30%). Rehabilitation of affordable units has been identified by the City as a high priority for continued funding.</p> <p>The City does not have a program to assist cost-burdened households with direct subsidies for mortgage or utility payments; however, the City's housing rehabilitation programs can address substandard conditions with interest free loans up to \$42,500 with \$15,000 available as a grant to remedy lead based paint deficiencies. Loan terms are based upon a borrower's ability to repay, with a minimum monthly payment of \$75.</p> <p>Programs to assist homeowners include CDBG Emergency Home Repair, CDBG Exterior Maintenance, HOME housing rehabilitation, Lead-Based Paint abatement, and whole house rehabilitation projects.</p> <p>Senior Citizens aged 62 or over, or homeowners of any age that are disabled, are eligible for a "Senior Loan" that is forgiven over five (5) years. If occupancy is terminated voluntarily prior to the end of the loan term, the outstanding principal balance must be repaid. The loan may be forgiven if the applicant passes away or involuntarily ceases to occupy the property as their primary residence and goes into an establishment that provides housing and general care for the aged or convalescent.</p>
Acquisition, including preservation	Acquisition/rehabilitation of existing properties for conversion to affordable rental housing are eligible for funding, with special emphasis on preservation and/or adaptive reuse of historical properties.

Table 52 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

First program year allocations are based upon the most recent projections available at the time of report submission. CDBG allocations in future years are projected to remain steady with no significant cuts anticipated. HOME funds continue to decline. The estimated HOME funding for future years is projected at 90% of the first year estimate, which may be somewhat optimistic. ESG and HOPWA funding are expected to remain steady.

In addition to the direct allocation of CDBG entitlement funds, The City has been awarded from the Oklahoma Department of Commerce \$33.5 million CDBG-DR funding for disaster recovery unmet needs. In addition, the City of Oklahoma City has agreed to partner with the City of Moore and the Oklahoma Department of Commerce in separate applications for funding under the National Disaster Resiliency Competition. The City of Oklahoma City will participate with the City of Moore and the Oklahoma Department of Commerce as a subrecipient. If awarded to either entity, the CDBG-NDRC funding will be expended during the five (5) year Consolidated Plan period.

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

The City has made application for Section 108 funding to fund a new 21C Museum Hotel in the historic Film Row District, and anticipates the use of its Section 108 Loan Guarantee capacity during the First Action Year Plan to support the development of a 135 room boutique hotel, restaurant and museum. The 21C site is located within the Oklahoma City Round III Empowerment Zone as designated by HUD (Census tract 1030.000). If additional opportunities materialize in the FY 2015-16 Action Plan year, Section 108 Loan Guarantee applications may be submitted to further the City's ongoing economic development initiatives.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	4,321,121	1,375,000	4,369,074	10,065,195	17,284,484	Prior year resources include 2014 unprogrammed funds, and recaptured program funds. Future allocations assume flat funding over the five (5) year life of the Plan.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,671,854	95,000	5,237,301	7,004,155	6,018,674	Prior year resources include unallocated 2014-15 program funds, and recaptured program funds. Future allocations assume a minimum 10% cut in funding over the five (5) year plan period.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	530,952	0	0	530,952	2,123,808	Future allocations assume flat funding from year to year.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	389,641	0	0	389,641	1,558,564	Future allocations assume flat funding from year to year.

Table 53 - Anticipated Resources

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

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

The City has a CHDO set-aside that includes the 15% CHDO statutory minimum and a pool of HOME funds loaned to Community Housing Development Organizations for new home construction and rehabilitation/sale activities. CHDOs are encouraged to utilize private bank financing along with the CHDO loan pool of HOME funds in providing affordable housing. Proposals for new projects are accepted when the

CHDO has completed all previously funded projects. The City facilitates the transfer at no cost, of Oklahoma County owned vacant lots to nonprofit organizations for the construction of affordable housing. The lots are provided to the City through an agreement with Oklahoma County. The primary lot recipients include CHDO's and Habitat for Humanity. The new home construction is typically funded with private financing and other resources. When resources allow, the City also provides local funding (general funds) to agencies that provide services to the homeless.

Federal funds provided by HUD are utilized in several ways to leverage public and private resources. The City's down payment and closing cost assistance program assists in the achievement of home ownership, and has proven to be an attractive program that stimulates significant interest among private lenders. During the 2013-2014 reporting period, the City leveraged its Down Payment Assistance program funds with private financial institution mortgage investments totaling \$5,659,832.25. Similar leverage can be anticipated annually in future program years.

The City may also assist developers by providing HOME funds to document community support for Low Income Housing Tax Credit (LIHTC) applications to the Oklahoma Housing Finance Agency (OHFA) when reasonable to do so. OHFA provides bonus points for applications that receive a minimum level of funding granted to the project from the local community. LIHTC credits provide significant leverage in affordable housing developments.

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

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

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

Discussion

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

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Oklahoma City	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Public Housing Rental neighborhood improvements public facilities public services	Jurisdiction

Table 54 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

Grant funds covered under the Consolidated Plan and other non-federal grant funds are utilized in an efficient manner to provide services and activities that benefit the various segments of low and moderate 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 racial and ethnic segments of the population to the greatest extent possible.

The primary weakness in the delivery system is lack of funds to address the identified needs within the community. The City has and 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.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X		
Mortgage Assistance	X		

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Rental Assistance	X	X	X
Utilities Assistance	X		X
Street Outreach Services			
Law Enforcement	X		
Mobile Clinics			
Other Street Outreach Services		X	
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X		
Employment and Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS	X		X
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X		
Other			
Domestic Violence Counseling	X	X	

Table 55 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

The City works with numerous nonprofit social services providers through the Continuum of Care program (CoC). The CoC Committee coordinates the City's homeless assistance programs and the development of the City's annual CoC grant application. The City also conducts an annual Point in Time (PIT) count of the City's homeless. Data gathered through this effort, coupled with consultation with local homeless service providers is used to develop the City's homeless strategy. Oklahoma City provides the vast majority of housing and services for people who are homeless within the metro area. In the 2014 PIT count of the homeless, those surveyed who became homeless while located in areas outside the city limits were not identified. This information will be obtained in future PIT counts to gauge how many homeless individuals relocate to Oklahoma City from other areas in search of housing and financial resources.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

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. Using the annual PIT as a gauge of the needs of chronically homeless, the City through community partnerships has worked to create permanent supportive housing beds in effort to eliminate homelessness.

In the last five (5) years, families with children have become the fastest growing sub-population of homeless. Oklahoma City has focused efforts through ESG on decreasing the number of families with children that enter shelters. The 2014 PIT count indicates that the number of families with children in shelters has decreased 18.4% from 2013. When taking into account the recent downturn in the economy, rising unemployment and the increase in the number of foreclosures, the efforts made through the targeted initiatives have had a significant impact on this population.

Local service providers are also reporting an increase in homeless youth under the age of 21. Many of these youth are maintaining a transitory life-style (commonly referred to as "couch surfing"), so exact numbers are difficult to obtain. Among those affected, many have aged out of the foster care system at age 18 without subsequent housing options available to them. The need for regional drop-in centers and/or a youth shelter has been identified in this Plan as an unmet need.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

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

The primary weakness in the delivery system is lack of funds to address the identified needs within the community. The City has and 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.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Administration	2015	2020	Administration		Administration	CDBG: \$4,396,120 HOME: \$1,053,470	Other: 1 Other
2	Rental Housing Construction- HOME	2015	2019	Affordable Housing	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Supply of Affordable Rental Housing	HOME: \$1,125,000	Rental units constructed: 130 Household Housing Unit
3	Whole-House Rehabilitation-HOME	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Quality of Affordable Owner Housing	HOME: \$3,500,000	Homeowner Housing Rehabilitated: 60 Household Housing Unit
4	Exterior Maintenance and Storm Shelters- CDBG	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Quality of Affordable Owner Housing	CDBG: \$600,000	Homeowner Housing Rehabilitated: 60 Household Housing Unit
5	Emergency Repairs- CDBG	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Quality of Affordable Owner Housing	CDBG: \$2,936,210	Homeowner Housing Rehabilitated: 500 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Downpayment and Closing Costs Assistance-HOME	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Affordability of Owner-Occupied Housing	HOME: \$3,500,000	Homeowner Housing Added: 375 Household Housing Unit
7	CHDO New Construction/Rehab-HOME	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA	Affordability of Owner-Occupied Housing Supply of Affordable Owner-Occupied Housing	HOME: \$1,822,586	Homeowner Housing Added: 30 Household Housing Unit Homeowner Housing Rehabilitated: 10 Household Housing Unit
8	Multi-Family Rehab-CDBG	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA	Supply of Affordable Rental Housing	CDBG: \$1,500,000	Rental units rehabilitated: 40 Household Housing Unit
9	Rehabilitation of Public Housing Units- CDBG	2015	2020	Public Housing	NEIGHBORHOOD STRATEGY AREA	Quality of Public Housing	CDBG: \$1,174,485	Rental units rehabilitated: 75 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
10	Affordable Housing- AHDP and RHP- CDBG and HOME	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA	Affordability of Owner-Occupied Housing Supply of Affordable Housing - AHDP and RHP	CDBG: \$625,000 HOME: \$2,021,773	Rental units constructed: 75 Household Housing Unit Homeowner Housing Added: 40 Household Housing Unit
11	Housing for the Chronically Homeless- ESG	2015	2020	Homeless		Supportive Housing for the Chronically Homeless	ESG: \$389,641	Housing for Homeless added: 100 Household Housing Unit
12	Homeless Youth Facilities -ESG	2015	2020	Homeless		Services for Homeless Youth (Age 21 and under)	ESG: \$389,641	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 1050 Households Assisted Homeless Person Overnight Shelter: 250 Persons Assisted
13	Housing Sustainability for the Homeless- ESG	2015	2020	Homeless		Sustainability of Transitional Housing	ESG: \$389,641	Homelessness Prevention: 2965 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
14	Homeless Persons Employment- ESG	2015	2020	Homeless		Increased Employment Rate for CoC Participants	ESG: \$389,641	Homelessness Prevention: 650 Persons Assisted
15	Homeless Households with Children- ESG	2015	2020	Homeless		Homeless Households with Children	ESG: \$389,641	Homelessness Prevention: 400 Persons Assisted
16	Public Facilities, Srvcs, Infrastructure-SNI CDBG	2015	2020	Non-Housing Community Development	NEIGHBORHOOD STRATEGY AREA	Quality of Affordable Owner Housing Public Facilities, Services and Infrastructure Strengthen Neighborhood Capacity	CDBG: \$4,695,000	Public service activities other than Low/Moderate Income Housing Benefit: 3800 Persons Assisted
17	Neighborhood Capacity- CDBG	2015	2020	Non-Housing Community Development	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Strengthen Neighborhood Capacity	CDBG: \$200,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 20000 Persons Assisted
18	Aid Blighted, Vacant, Underutilized Property-CDBG	2015	2020	Non-Housing Community Development	NEIGHBORHOOD STRATEGY AREA	Acquisition/Clearance of Vacant, Blighted Property	CDBG: \$50,000	Buildings Demolished: 8 Buildings
19	Graffiti Removal-CDBG	2015	2020	Non-Housing Community Development	NEIGHBORHOOD STRATEGY AREA	Public Services-Graffiti Removal	CDBG: \$75,055	Public service activities other than Low/Moderate Income Housing Benefit: 1000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
20	Secure Vacant and Abandoned Properties- CDBG	2015	2020	Non-Housing Community Development		Address Slum and Blight- Vacant Abandoned Bldgs	CDBG: \$342,810	Public service activities other than Low/Moderate Income Housing Benefit: 625 Persons Assisted
21	Small Business Technical Assistance- CDBG	2015	2020	Non-Housing Community Development		Economic Opportunities for Low and Moderate Income	CDBG: \$195,745	Businesses assisted: 450 Businesses Assisted
22	Small Business Revolving Loan Fund- CDBG	2015	2020	Non-Housing Community Development		Economic Opportunities for Low and Moderate Income	CDBG: \$750,000	Businesses assisted: 16 Businesses Assisted
23	Urban Renewal Title Transfer and Disposition- CDBG	2015	2020	Non-Housing Community Development	NEIGHBORHOOD STRATEGY AREA	Economic Opportunities for Low and Moderate Income	CDBG: \$50,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 25 Households Assisted
24	Section 108 Loan Assistance- CDBG	2015	2020	Non-Housing Community Development	NEIGHBORHOOD STRATEGY AREA	Economic Opportunities for Low and Moderate Income	CDBG: \$1,750,000	Jobs created/retained: 209 Jobs
25	Empowerment Zone Staffing- CDBG	2015	2020	Non-Housing Community Development		Economic Opportunities for Low and Moderate Income	CDBG: \$1	Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
26	Special Needs Transportation Services-CDBG	2015	2020	Non-Housing Community Development		Transportation Options -Special Needs Population	CDBG: \$514,210	Public service activities other than Low/Moderate Income Housing Benefit: 2500 Persons Assisted
27	STRMU for Persons with HIV/AIDS- HOPWA	2015	2020	Non-Homeless Special Needs		Housing Availability- Persons With HIV/AIDS	HOPWA: \$1,327,380	HIV/AIDS Housing Operations: 440 Household Housing Unit
28	TBRA for Persons with HIV/AIDS- HOPWA	2015	2020	Non-Homeless Special Needs		Housing Availability- Persons With HIV/AIDS	HOPWA: \$1,327,380	Housing for People with HIV/AIDS added: 375 Household Housing Unit
29	Sustainability-Social Services Provider Facilities	2015	2017	Non-Housing Community Development		Sustainability Service Provider Facilities-CDBG	CDBG: \$1,455,435	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1000 Persons Assisted Other: 1 Other

Table 56 – Goals Summary

Goal Descriptions

1	Goal Name	Administration
	Goal Description	Administrative expenses associated with management of CDBG and HOME programs, and local fair housing efforts.
2	Goal Name	Rental Housing Construction- HOME
	Goal Description	Funding for the construction of new affordable rental units using HOME funds under the Rental Housing Program.
3	Goal Name	Whole-House Rehabilitation-HOME
	Goal Description	Provide HOME financial assistance for the whole-house rehabilitation of a minimum of fifteen (15) owner-occupied housing units annually for income-qualified households.
4	Goal Name	Exterior Maintenance and Storm Shelters-CDBG
	Goal Description	Provide CDBG funding for the remediation of exterior maintenance code problems on a minimum of thirty-five (35) owner-occupied housing units annually, and construction of fifteen (15) storm shelters for qualified families annually.
5	Goal Name	Emergency Repairs-CDBG
	Goal Description	Provide CDBG Funding for emergency repairs of a minimum one hundred (100) owner-occupied housing units annually to address imminent threats to life, health and safety.
6	Goal Name	Downpayment and Closing Costs Assistance-HOME
	Goal Description	Provide HOME funding for down payment and closing costs assistance for a minimum of seventy-five (75) households annually.
7	Goal Name	CHDO New Construction/Rehab- HOME
	Goal Description	Provide HOME funding for new construction or rehabilitation of at least eight (8) housing units annually through Community Housing Development Organizations (CHDO's) and non-profit housing providers.
8	Goal Name	Multi-Family Rehab- CDBG
	Goal Description	Provide CDBG funding for the rehabilitation of a minimum of eight (8) multi-family rental units annually.

9	Goal Name	Rehabilitation of Public Housing Units- CDBG
	Goal Description	Provide CDBG funding to the Oklahoma City Housing Authority for the rehabilitation of a minimum of fifteen (15) public housing units annually.
10	Goal Name	Affordable Housing-AHDP and RHP- CDBG and HOME
	Goal Description	Provide HOME and CDBG funding to the Affordable Housing Development Program (AHDP) and Rental Housing Program (RHP) to increase the supply of affordable housing by eight (8) units annually for low to moderate income homebuyers.
11	Goal Name	Housing for the Chronically Homeless- ESG
	Goal Description	Increase housing and case management resources for chronically homeless individuals, families and veterans by a minimum of twenty (20) units annually.
12	Goal Name	Homeless Youth Facilities -ESG
	Goal Description	Provide ESG funds to support the development of one (1) Drop-in Center in each quadrant of the City and development of one (1) youth shelter within the five (5) year Consolidated Plan period for homeless youth age 21 and under. It is estimated that each drop-in shelter will serve 150 youth annually and that the overnight shelter will serve 250 homeless youth per year. One (1) drop-in centers is expected to be constructed each year. The overnight shelter is estimated to be completed in the fourth (4th) or fifth (5th) Action Plan year.
13	Goal Name	Housing Sustainability for the Homeless- ESG
	Goal Description	Achieve and maintain the percentage of previously homeless persons staying in permanent housing over six (6) months to at least 77%, with an annual goal of 3% improvement. As a baseline, 576 persons were reported as meeting the six (6) month threshold in 2014.
14	Goal Name	Homeless Persons Employment- ESG
	Goal Description	Increase the number of employed program participants in the Continuum of Care program to at least 45%. As a baseline, 130 program participants were reported in 2014 as having gained employment.
15	Goal Name	Homeless Households with Children- ESG
	Goal Description	Using ESG funding, decrease the number of homeless households with children by 32% over the next five (5) years through rapid rehousing and prevention initiatives. It is estimated that eighty (80) families with children will be assisted annually.

16	Goal Name	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Goal Description	Provide CDBG funding to assist a minimum of three (3) neighborhoods annually by financing needed neighborhood infrastructure improvements, public facilities and/or services in SNI neighborhood low and moderate income areas.
17	Goal Name	Neighborhood Capacity- CDBG
	Goal Description	Assist a minimum of three (3) neighborhood associations in organizing activities and implementation of CDBG eligible public facilities or or services annually. It is estimated that 4,000 persons will be assisted in the first Action Plan year. Funding for this activity in future years may create additional community benefit for these same 4,000 persons.
18	Goal Name	Aid Blighted, Vacant, Underutilized Property-CDBG
	Goal Description	Provide CDBG Funding for the acquisition and clearance of at least two (2) blighted properties annually. This program has not been funded in the first year Action Plan.
19	Goal Name	Graffiti Removal-CDBG
	Goal Description	Provide CDBG funding to eliminate graffiti at a minimum of two hundred (200) locations annually in low and moderate income neighborhoods.
20	Goal Name	Secure Vacant and Abandoned Properties- CDBG
	Goal Description	Provide CDBG funding for interim assistance to secure a minimum of 125 vacant and abandoned properties annually to address slum and blight on a spot basis.
21	Goal Name	Small Business Technical Assistance- CDBG
	Goal Description	Provide CDBG funding for Technical Assistance (TA) for a minimum of ninety (90) small businesses annually.
22	Goal Name	Small Business Revolving Loan Fund- CDBG
	Goal Description	Provide CDBG economic development revolving loan fund (RLF) financial assistance to create jobs and expand commercial services to a minimum of four (4) businesses and microenterprises annually. This is a new program, and it is not anticipated that loans will be made until the second (2nd) Action Year of the Consolidated Plan. The fund was capitalized in Spring 2015 using prior year CDBG funds. No additional expenditures are anticipated over the life of this Plan.

23	Goal Name	Urban Renewal Title Transfer and Disposition- CDBG
	Goal Description	Provide CDBG funding for the title transfer and disposition of a minimum of five (5) Urban Renewal properties annually.
24	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 "funding" allocation noted below is the annual debt service on outstanding loans as opposed to direct funding of a specific project. 71 new jobs are expected to be created in 2015 at the Embassy Suites hotel, and 138 new Jobs are anticipated in 2016 with the completion of the 21C hotel and museum project.
25	Goal Name	Empowerment Zone Staffing- CDBG
	Goal Description	Promote and continue to provide staff support for the ongoing implementation of the Empowerment Zone (EZ) designation, if the program is extended beyond December 31, 2014. No funding has been allocated to this activity pending notification of extension.
26	Goal Name	Special Needs Transportation Services-CDBG
	Goal Description	Expand transportation options using CDBG funds for persons with special needs to improve accessibility and improve quality of life. An estimated 13,000 subsidized taxi fares coupons and bus tokens will be provided annually to approximately 500 homeless persons, seniors and persons with disabilities.
27	Goal Name	STRMU for Persons with HIV/AIDS- HOPWA
	Goal Description	Provide Short Term Rent Mortgage and Utility (STRMU) assistance using HOPWA funding to eighty-eight (88) persons with HIV/AIDS annually.
28	Goal Name	TBRA for Persons with HIV/AIDS- HOPWA
	Goal Description	Provide Tenant Based Rental Assistance (TBRA) using HOPWA funding to an estimated seventy-five (75) persons with HIV/AIDS annually.

29	Goal Name	Sustainability-Social Services Provider Facilities
	Goal Description	Provide funding to local non-profit(s) to assist in rehabilitation and expansion of existing facilities for social services and/or assistance in the construction of public infrastructure. Specific activities have not yet been selected. It is estimated that a minimum of two hundred (200) persons annually will benefit from support services and/or case management.

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 91.315(b)(2)

During the five (5) year time frame covered by the Consolidated Plan, it is anticipated that the City of Oklahoma City will assist 5,565 households in the attainment or retention of affordable housing. This total includes new affordable units (both rental and home ownership), recipients of down payment assistance, rehabilitation program beneficiaries, previously homeless individuals housed in transitional units, and recipients of TBRA and STRMU assistance funded thru HOPWA.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

All of the findings from the most recent Section 504 audit were addressed and resolved within the Oklahoma City Housing Authority (OCHA). OCHA is not allowed to maintain a separate waiting list for accessible units; however, if an applicant's name rises to the top of the list, they can refuse the apartment and wait on one that is accessible without losing their place on the list. In some cases, a unit can be modified to meet the needs of the tenant at minimal cost. Approximately 10% of the units are handicapped accessible. OCHA reports that at the present time, there does not appear to be a need for additional handicapped units.

Activities to Increase Resident Involvements

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.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the 'troubled' designation

Not Applicable

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

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

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

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

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

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

- Adoption of the International Existing Building Code; This Code applies to multi-family housing and reduces financial barriers to renovating existing building by allowing greater flexibility in materials used in the renovation;
- The City has exempted impact fees for water and sewer in the core area of the city to reduce the cost of infill housing and other redevelopment efforts;
- The City has exempted the fees for permits to nonprofit builders of affordable housing;

- The City does not require engineering or architectural seals for nonprofit affordable housing developers;
- Building permit fees are waived by policy for nonprofit charitable organizations engaged in the construction or remodeling of one or two family dwellings for the purpose of providing housing assistance to low-income persons or households;
- There are no licensing requirements for builders or professionals except in the case of high-rise structures.

The City's response to the noted impediments is more clearly defined in Section AP-75 of the Action Plan, and will be reviewed annually to ensure compliance with Fair Housing requirements.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

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

City Council has indicated a willingness to support changes to the existing ordinances to update protected class definitions. 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 attendance is very weak. This would seem to indicate a need for an extended marketing and 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 is expected to be finalized 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. That said, all present zoning codes are being evaluated in the new Comprehensive Plan, providing the

City with an opportunity to identify potential ordinance language that could conceivably create an unintended consequence in the provision of fair housing. Problematic language will be revised to eliminate obstacles to fair housing.

SP-60 Homelessness Strategy – 91.215(d)

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

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

Addressing the emergency and transitional housing needs of homeless persons

ESG funds may be 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 tends 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 and 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 remains 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 consists of permanent housing services. Permanent housing services help families and individuals access housing within twenty-one (21) days of assessment, and sustain that housing for at least seven (7) months after exiting the program. This includes working with the client to identify affordable units, assisting them in accessing housing subsidies, and negotiating leases. Clients may require assistance to overcome barriers, such as poor tenant history, credit history, and discrimination based on ethnicity, gender, family make-up and income source. Case managers work with the Housing Resource Locator to locate appropriate housing.

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

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

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

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

The ESG prevention program includes financial assistance and case management for households who are currently housed, but are at imminent risk (within two weeks) of becoming homeless and are in need of temporary rent or utility assistance, or financial assistance enabling them to move to another

unit. In cases where households desire to remain in housing that is substandard, it is allowable for case managers to provide assistance in locating and moving households to units that meet minimum housing standards. Households receiving prevention assistance may need minimum supportive services and follow-up care. The case manager is responsible for providing the appropriate supportive services and follow-up care as needed on a case by case basis. It is anticipated that most prevention assistance will last for one (1) to six (6) months. A standardized housing assessment and housing plan will be completed for all program participants to ensure housing stability after ESG assistance terminates.

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

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

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

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

The 2007-2011 ACS data reflects that there are 74,897 occupied housing units constructed prior to 1980 that have the potential for lead contamination. Of this total amount 11,704 have children present in the home. The City funds various activities that fall into the category of residential rehabilitation. Since September 15, 2000, when residential rehabilitation activities funded by the City are conducted, the regulations prescribed for lead-based paint, contained at 24 CFR Part 35 are used as the guide for achieving compliance. Under the regulations, the City is required to follow the approaches to Lead Hazard evaluation, provide the proper notifications, perform the Lead Hazard evaluation, and follow the safe work practices and clearance requirements.

Contractors performing work to meet compliance with lead-based paint regulations in a cost range of \$5,000 to \$25,000 must provide supervision by a State licensed supervisor. The Oklahoma Department of Environmental Quality (DEQ) manages licensing/certification requirements. Workers engaged in curing lead-based paint defects do not have to be licensed, but they are required to attend a DEQ workshop on protection.

City staff functioning in the positions of Risk Assessor or Inspector must be licensed by DEQ. At present, all of the Oklahoma City rehabilitation specialists are licensed. The City has acquired XRF testing devices, and all rehabilitation inspectors are qualified to perform the tests required on residential structures, including the clearance certification after abatement work has been performed.

The City's housing rehabilitation staff conducts an assessment of lead-based hazards in all pre-1978 homes accepted into the housing rehabilitation program workflow.

The Oklahoma City Housing Authority complies with the lead-based paint hazard reduction requirements in assisted properties. The City's rehabilitation inspection staff conducts all lead-based testing, assessment and clearance inspections for all sub-grantee and CHDO organizations except in cases where those organizations have contracted with other testing entities.

How are the actions listed above related to the extent of lead poisoning and hazards?

All applicants to the City's Rehabilitation programs receive priority for contracting and funding when lead based paint is present in a home with children.

How are the actions listed above integrated into housing policies and procedures?

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.

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

The City's housing rehabilitation program reports to the Health Department on all children living in properties tested where the presence of lead-based paint is found.

Oklahoma City staff participates in a training workshop in cooperation with the City-County Health Department for citizens and health care professionals concerning lead-based paint. The workshop is at no cost to participants.

The City-County Health Department tests children for elevated blood lead at no cost to the client.

The Oklahoma State Health Department provides training at no cost and answers questions for testing in lead based paint. Participants can apply for a rehab program through our CDBG and HOME programs for rehab of lead based paint. Residents that wish to participate in the classes may call the City's Housing Rehabilitation Program for assistance in addressing lead based paint hazards.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

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

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 substantial revenue for improvements in suburban school districts that educate children of Oklahoma City residents. Education serves as one of the cornerstone of most effective anti-poverty strategies.

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

The total local public investment in the all three (3) MAPS programs exceeds \$1.8 billion.

In addition to the locally funded economic development and job creation efforts to combat poverty, the City utilizes federal resources to stimulate job growth. The Community Action Agency manages a small business development loan fund capitalized by a \$4 million Section 108 Loan Guarantee. The loan fund was established to make loans to small businesses in the Neighborhood Revitalization Strategy Area.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

The City places a high priority on mixed income neighborhoods and deconcentration of poverty. All funding decisions are sensitive to the highest levels of need, and the desire to allocate limited resources strategically to provide a holistic approach to neighborhood revitalization.

SP-80 Monitoring – 91.230

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

Oklahoma City monitors all activities it funds with federal grants. A compliance review is conducted for all sub-recipients on an annual basis.

Office of the City Auditor, Outside Auditor (A-133), and the Office of Inspector General:

1. The City's internal auditors randomly audit various programs in city departments.
2. As part of the annual independent A-133 audit, federally funded activities are audited to determine compliance with grant provisions and federal guidelines. The City Manager, City Council and the auditing firm review any responses to exceptions and corrective actions.
3. Agreements with sub-grantees require annual independent audits be made and that copies of the audits be provided to the City within 30-days of receipt by the agency. The audit reports are reviewed along with corrective actions for any exceptions found.
4. The documentation required in support of federal draw-down requests is also required to access funds through the City's procurement system.

Activities that are not funded by the City are monitored through reports, by review of minutes of committees and agencies, and through staff participation on or attendance at meetings of various committees and boards.

When Subgrantees are monitored, the following procedure is used:

- Prepare schedule of monitoring visits.
- Notify subrecipients of date(s) set for monitoring visit(s).
- Review with subrecipient the monitoring checklist that will be used as a monitoring guide.
- Conduct the monitoring review as follows:
- Check minutes of Board meetings for actions, authorizations affecting operations, expenditures, and personnel actions.
- Review time records and other documents relating to time spent on program activities.
- Check deposit records.
- Check expenditures by examining vouchers, supporting documentation and/or canceled checks to determine eligibility of costs.
- Determine that books of account(s) agree with the reports submitted by the funded agency.
- Review records to determine eligibility of low and moderate income beneficiaries, to include examination of income source documents.
- Determine that requested funds are spent timely, if applicable.

- Conduct an exit interview to review findings and/or concerns noted during the audit with relevant agency staff.
- Prepare a written report to the Board Chairperson/President relating the method of review, determination of compliance, concerns, findings or other relevant comments. The letter must identify a deadline for correction or submission of information and must offer technical assistance if appropriate.
- Subgrantee monitoring reports are presented to the Division Heads of the Grants Management Division and the Community Development Division for review.

Expected Resources

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

Introduction

First program year allocations are based upon the most recent projections available at the time of report submission. CDBG allocations in future years are projected to remain steady with no significant cuts anticipated. HOME funds continue to decline. The estimated HOME funding for future years is projected at 90% of the first year estimate, which may be somewhat optimistic. ESG and HOPWA funding are expected to remain steady.

In addition to the direct allocation of CDBG entitlement funds, The City has been awarded from the Oklahoma Department of Commerce \$33.5 million CDBG-DR funding for disaster recovery unmet needs. In addition, the City of Oklahoma City has agreed to partner with the City of Moore and the Oklahoma Department of Commerce in separate applications for funding under the National Disaster Resiliency Competition. The City of Oklahoma City will participate with the City of Moore and the Oklahoma Department of Commerce as a subrecipient. If awarded to either entity, the CDBG-NDRC funding will be expended during the five (5) year Consolidated Plan period.

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

The City has made application for Section 108 funding to fund a new 21C Museum Hotel in the historic Film Row District, and anticipates the use of its Section 108 Loan Guarantee capacity during the First Action Year Plan to support the development of a 135 room boutique hotel, restaurant and museum. The 21C site is located within the Oklahoma City Round III Empowerment Zone as designated by HUD (Census tract 1030.000). If additional opportunities materialize in the FY 2015-16 Action Plan year, Section 108 Loan Guarantee applications may be submitted to further the City's ongoing economic development initiatives.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	4,321,121	1,375,000	4,369,074	10,065,195	17,284,484	Prior year resources include 2014 unprogrammed funds, and recaptured program funds. Future allocations assume flat funding over the five (5) year life of the Plan.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,671,854	95,000	5,237,301	7,004,155	6,018,674	Prior year resources include unallocated 2014-15 program funds, and recaptured program funds. Future allocations assume a minimum 10% cut in funding over the five (5) year plan period.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	530,952	0	0	530,952	2,123,808	Future allocations assume flat funding from year to year.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	389,641	0	0	389,641	1,558,564	Future allocations assume flat funding from year to year.

Table 57 - Expected Resources – Priority Table

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

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

The City has a CHDO set-aside that includes the 15% CHDO statutory minimum and a pool of HOME funds loaned to Community Housing Development Organizations for new home construction and rehabilitation/sale activities. CHDOs are encouraged to utilize private bank financing along with the CHDO loan pool of HOME funds in providing affordable housing. Proposals for new projects are accepted when the

CHDO has completed all previously funded projects. The City facilitates the transfer at no cost, of Oklahoma County owned vacant lots to nonprofit organizations for the construction of affordable housing. The lots are provided to the City through an agreement with Oklahoma County. The primary lot recipients include CHDO's and Habitat for Humanity. The new home construction is typically funded with private financing and other resources. When resources allow, the City also provides local funding (general funds) to agencies that provide services to the homeless.

Federal funds provided by HUD are utilized in several ways to leverage public and private resources. The City's down payment and closing cost assistance program assists in the achievement of home ownership, and has proven to be an attractive program that stimulates significant interest among private lenders. During the 2013-2014 reporting period, the City leveraged its Down Payment Assistance program funds with private financial institution mortgage investments totaling \$5,659,832.25. Similar leverage can be anticipated annually in future program years.

The City may also assist developers by providing HOME funds to document community support for Low Income Housing Tax Credit (LIHTC) applications to the Oklahoma Housing Finance Agency (OHFA) when reasonable to do so. OHFA provides bonus points for applications that receive a minimum level of funding granted to the project from the local community. LIHTC credits provide significant leverage in affordable housing developments.

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

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

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

Discussion

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

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

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: \$1,541,555	Homeowner Housing Rehabilitated: 15 Household Housing Unit
2	Exterior Maintenance and Storm Shelters-CDBG	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Quality of Affordable Owner Housing	CDBG: \$1,331,961	Homeowner Housing Rehabilitated: 50 Household Housing Unit
3	Emergency Repairs-CDBG	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Quality of Affordable Owner Housing	CDBG: \$587,242	Homeowner Housing Rehabilitated: 100 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Downpayment and Closing Costs Assistance-HOME	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Affordability of Owner-Occupied Housing	HOME: \$700,000	Homeowner Housing Added: 75 Household Housing Unit
5	CHDO New Construction/Rehab-HOME	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA	Supply of Affordable Owner-Occupied Housing	HOME: \$1,822,586	Homeowner Housing Added: 8 Household Housing Unit
6	Multi-Family Rehab-CDBG	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA	Quality of Affordable Owner Housing	CDBG: \$1,097,753	Rental units rehabilitated: 8 Household Housing Unit
7	Rehabilitation of Public Housing Units- CDBG	2015	2020	Public Housing		Quality of Public Housing	CDBG: \$234,897	Rental units rehabilitated: 15 Household Housing Unit
8	Affordable Housing-AHDP and RHP- CDBG and HOME	2015	2020	Affordable Housing	NEIGHBORHOOD STRATEGY AREA	Supply of Affordable Housing - AHDP and RHP	CDBG: \$75,000 HOME: \$225,000	Homeowner Housing Added: 8 Household Housing Unit
9	Housing for the Chronically Homeless-ESG	2015	2020	Homeless		Supportive Housing for the Chronically Homeless	ESG: \$77,928	Housing for Homeless added: 20 Household Housing Unit
10	Homeless Youth Facilities -ESG	2015	2020	Homeless		Services for Homeless Youth (Age 21 and under)	ESG: \$77,928	Homelessness Prevention: 150 Persons Assisted
11	Housing Sustainability for the Homeless- ESG	2015	2020	Homeless		Sustainability of Transitional Housing	ESG: \$77,928	Homelessness Prevention: 593 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
12	Homeless Persons Employment- ESG	2015	2020	Homeless		Increased Employment Rate for CoC Participants	ESG: \$77,928	Homelessness Prevention: 130 Persons Assisted
13	Homeless Households with Children- ESG	2015	2020	Homeless		Homeless Households with Children	ESG: \$77,928	Homelessness Prevention: 80 Persons Assisted
14	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 Strengthen Neighborhood Capacity	CDBG: \$1,757,000	Public service activities other than Low/Moderate Income Housing Benefit: 747 Persons Assisted Other: 55 Other
15	Neighborhood Capacity- CDBG	2015	2020	Non-Housing Community Development	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Strengthen Neighborhood Capacity	CDBG: \$40,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4000 Persons Assisted
16	Graffiti Removal-CDBG	2015	2020	Non-Housing Community Development		Public Services- Graffiti Removal	CDBG: \$15,011	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 200 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
17	Secure Vacant and Abandoned Properties-CDBG	2015	2020	Non-Housing Community Development		Address Slum and Blight- Vacant Abandoned Bldgs	CDBG: \$68,562	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 130 Households Assisted
18	Small Business Technical Assistance-CDBG	2015	2020	Non-Housing Community Development		Economic Opportunities for Low and Moderate Income	CDBG: \$39,149	Businesses assisted: 90 Businesses Assisted
19	Small Business Revolving Loan Fund-CDBG	2015	2020	Non-Housing Community Development		Economic Opportunities for Low and Moderate Income	CDBG: \$750,000	Businesses assisted: 2 Businesses Assisted
20	Section 108 Loan Assistance- CDBG	2015	2020	Non-Housing Community Development	NEIGHBORHOOD STRATEGY AREA	Economic Opportunities for Low and Moderate Income	CDBG: \$350,000	Jobs created/retained: 71 Jobs
21	Empowerment Zone Staffing- CDBG	2015	2020	Non-Housing Community Development		Economic Opportunities for Low and Moderate Income	CDBG: \$1	Other: 1 Other
22	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: 500 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
23	STRMU for Persons with HIV/AIDS- HOPWA	2015	2020	Non-Homeless Special Needs		Housing Availability- Persons With HIV/AIDS	HOPWA: \$265,476	Housing for People with HIV/AIDS added: 88 Household Housing Unit
24	TBRA for Persons with HIV/AIDS- HOPWA	2015	2020	Non-Homeless Special Needs		Housing Availability- Persons With HIV/AIDS	HOPWA: \$265,476	Housing for People with HIV/AIDS added: 75 Household Housing Unit
25	Administration	2015	2020	Administration		Administration	CDBG: \$879,224 HOME: \$417,402	Other: 1 Other

Table 58 – 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 fifteen (15) owner-occupied housing units for income qualified families.
2	Goal Name	Exterior Maintenance and Storm Shelters-CDBG
	Goal Description	Provide CDBG funding for the remediation of exterior maintenance code violations on a minimum of thirty-five (35) owner-occupied housing units for income qualified families, and installation of storm shelters for a minimum of fifteen (15) homeowners.

3	Goal Name	Emergency Repairs-CDBG
	Goal Description	Provide CDBG funding for emergency repairs of a minimum of one hundred (100) owner-occupied housing units for income qualified families to address immediate threats to life, health and safety.
4	Goal Name	Downpayment and Closing Costs Assistance-HOME
	Goal Description	Provide HOME funding for down payment and closing costs assistance for a minimum of seventy-five (75) households.
5	Goal Name	CHDO New Construction/Rehab- HOME
	Goal Description	Provide HOME funding for new construction or rehabilitation of at least eight (8) housing units for income qualified families through Community Housing Development Organizations (CHDO's) and non-profit housing providers.
6	Goal Name	Multi-Family Rehab- CDBG
	Goal Description	Provide CDBG and HOME funding for the rehabilitation of a minimum of eight (8) multifamily rental units.
7	Goal Name	Rehabilitation of Public Housing Units- CDBG
	Goal Description	Provide CDBG funding to the Oklahoma City Housing Authority for the rehabilitation of a minimum of fifteen (15) public housing units.
8	Goal Name	Affordable Housing-AHDP and RHP- CDBG and HOME
	Goal Description	Provide HOME funding to the Rental Housing Program (RHP) and CDBG funding to OCURA AHD to increase the supply of affordable housing by eight (8) units.
9	Goal Name	Housing for the Chronically Homeless- ESG
	Goal Description	Increase housing and case management resources for chronically homeless individuals, families and veterans by a minimum of twenty (20) units.
10	Goal Name	Homeless Youth Facilities -ESG
	Goal Description	Provide ESG funding to support the development of one (1) drop-in center for homeless youth. The center is expected to serve approximately 150 homeless youth annually.

11	Goal Name	Housing Sustainability for the Homeless- ESG
	Goal Description	Increase the percentage of previously homeless persons staying in permanent housing for at least six (6) months by a minimum of 3%, or 593 persons.
12	Goal Name	Homeless Persons Employment- ESG
	Goal Description	Increase the number of employed participants in the Continuum of Care program to at least 45%, or 130 persons.
13	Goal Name	Homeless Households with Children- ESG
	Goal Description	Using ESG funding, decrease the number of homeless households with children by 32% through rapid rehousing and prevention initiatives, or 80 families assisted.
14	Goal Name	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Goal Description	Provide CDBG Funding to assist in public services and public facilities activities in the SNI neighborhoods, to include tree planting, hazardous tree removal, sidewalks, street lighting, legal assistance, park improvements, and after school programming.
15	Goal Name	Neighborhood Capacity- CDBG
	Goal Description	Assist a minimum of three (3) neighborhoods associations in organizing activities and implementation of CDBG eligible public facilities or services.
16	Goal Name	Graffiti Removal-CDBG
	Goal Description	Provide CDBG funding to eliminate graffiti at a minimum of two hundred (200) locations in low and moderate income neighborhoods.
17	Goal Name	Secure Vacant and Abandoned Properties- CDBG
	Goal Description	Provide CDBG funding for interim assistance to secure a minimum of 125 vacant and abandoned properties to address slum and blight on a spot basis.

18	Goal Name	Small Business Technical Assistance- CDBG
	Goal Description	Provide CDBG Technical Assistance (TA) for a minimum of ninety (90) small businesses.
19	Goal Name	Small Business Revolving Loan Fund- CDBG
	Goal Description	Provide CDBG economic development revolving loan fund (RLF) assistance to create jobs and expand commercial services for a minimum of four (4) businesses and microenterprises annually. Loan fund was capitalized in Spring 2015 with prior year CDBG funds. No future allocations are anticipated as fund should become self-supporting.
20	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 "funding" allocation noted below is the annual debt service on outstanding loans and not direct assistance to a specific project. It is anticipated that 71 jobs will be created upon completion of the Embassy Suites hotel in summer 2015.
21	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 beyond December 31, 2014. No funding has been allocated to this activity pending confirmation of extension.
22	Goal Name	Special Needs Transportation Services-CDBG
	Goal Description	Expand transportation options using CDBG funds for homeless individuals and persons with special needs to improve accessibility, and to improve quality of life. An estimated 13,000 subsidized taxi fares and bus coupons will be provided to approximately 500 homeless persons, seniors, and people with disabilities.
23	Goal Name	STRMU for Persons with HIV/AIDS- HOPWA
	Goal Description	Provide Short Term Rent Mortgage and Utility (STRMU) assistance using HOPWA funding to an estimated eighty-eight (88) persons with HIV/AIDS.
24	Goal Name	TBRA for Persons with HIV/AIDS- HOPWA
	Goal Description	Provide Tenant Base Rental Assistance (TBRA) using HOPWA funding to an estimated seventy-five (75) persons with HIV/AIDS.

25	Goal Name	Administration
	Goal Description	Provide administrative and management support for federal CDBG and HOME programs.

Projects

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Introduction

The following initiatives and goals for the 1st Action Year are consistent with those established in the Five-Year Consolidated Plan with an effective date of July 1, 2015, and are compatible with the purposes set forth in **24 CFR Section 91.1**, that include:

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

The goals and objectives that are addressed in this 1st Action Year Plan specifically relate to the goals outlined in the 2015-2020 Consolidated Plan and the Department of Housing and Urban Development goals that include:

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

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

Oklahoma City’s formula grant funding allocations, recommended for adoption the 1st Action Year Plan (fiscal year July 1, 2015 through June 30, 2016), follow the priorities established in the new five-year Consolidated Plan that expires June 30, 2020. The annual Action Year Strategy contains specific funding recommendations to implement the goals established in the five-year Plan tables to the extent possible depending on federal funding allocations awarded to Oklahoma City.

The funding recommendations for the 2015-2016 Action Year were considered by the Citizen’s Committee for Community Development on February 17, 2015, and received their favorable recommendation. The funding recommendations were next considered by the Neighborhood Conservation Committee on March 3, 2015, and received their favorable recommendation. Final Plan approval was granted by the City Council on April 28, 2015.

Projects

#	Project Name
1	Housing Assistance Program-Whole House Rehab
2	Housing Assistance Program-Exterior Maintenance/Storm Shelters
3	CAA Emergency Home Repair Program
4	Targeted Area DPA
5	Non-Target Area Down Payment Assistance
6	CHDO Set-Aside: New Construction
7	CHDO Set-aside: Loan Pool
8	Multifamily Rental Rehab-CDBG
9	Rehabilitation of Public Housing Units
10	ESG Activities
11	CAA Graffiti Removal
12	OKC Abandoned Housing
13	CAA Small Business Services
14	CDBG Economic Development RLF
15	HUD Section 108 Loan- 21C Museum Hotel
16	Empowerment Zone Staff Support
17	COTPA (Embark) Share-a-Fare Program
18	HOPWA Short Term Rent, Mortgage, and Utility Assistance
19	HOPWA Tenant Based Rental Assistance
20	OCURA Affordable Housing Development
21	Midtown Neighborhood Improvement Project
22	Community Dev Program- Public Facilities/Infrastructure-CDBG

#	Project Name
23	Economic Opportunity-Urban Renewal Authority
24	Metro Fair Housing Council
25	Administration-Planning
26	Administration- CDBG and HOME
27	Rental Housing Program- Central Urban Development
28	SNI Non-Profit Housing Construction
29	AHDP- Homeless Alliance Project
30	AHDP- Mitchford Project
31	AHDP- Ron Walters Project
32	SNI Program Whole House Rehabs-HOME
33	Hazardous Tree Removal
34	Public Services- Education Programs
35	Legal Assistance to Homeowners and Non-Profit Organizations
36	Sidewalks and Street lighting - SNI
37	Public Facilities-Tree Planting
38	Public Facilities- Park Improvements
39	Public Facilities- Neighborhood-led Projects
40	Public Services- After School Programs SNI
41	Public Services-Legal Assistance

Table 59 – Project Information

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

Basis for Category Priority

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

1. Preservation of existing housing stock, particularly in the Neighborhood Revitalization Strategy Area where the greatest concentration of lower-income persons and minorities reside. Funding is allocated to fund rehabilitation of private homes, provide for emergency home repair, exterior maintenance repair, and rehabilitation of public housing units.
2. Permanent housing for the chronic homeless that includes persons with serious mental illness, substance abuse, and other disabilities. Funds can be allocated to match other grant in aid programs, or to accumulate sufficient funds to start a sponsored permanent homeless housing projects.

3. Emergency shelter and the provision of social services to homeless persons, families, and special needs populations is a high priority. All of the Emergency Solutions Grant funds are allocated to provide shelters with operating funds and services to care for this special population.
4. Down payment and closing cost assistance to increase the affordability of home ownership.
5. Increasing the supply of affordable housing is a high priority. Community Housing Development Organizations (CHDOs) and other non-profits are eligible to apply for allocations of HOME funds to construct new homes, or purchase/rehab homes for eligible owner households.
6. Objectives that improve the quality of owner housing have a high priority including emergency home repair, housing exterior maintenance and whole house rehabilitation.
7. Objectives that improve the quality of public housing have high priority.

Obstacles to Meeting Underserved Needs

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

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Project Summary Information

1	Project Name	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: \$1,541,555
	Description	Provide HOME financial assistance for the whole-house rehabilitation of a minimum of fifteen (15) owner-occupied housing units.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	Fifteen (15) low to moderate income families will receive whole-house rehabilitations.
	Location Description	City-wide, with priority placed on properties within the SNI and NRSA neighborhoods.
	Planned Activities	Whole House Rehabilitations
2	Project Name	Housing Assistance Program-Exterior Maintenance/Storm Shelters
	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: \$1,331,961
	Description	Provide CDBG funding to remediate exterior maintenance code problems for fifty(50) low to moderate income homeowners, to include installation of safe rooms and storm shelters.
	Target Date	6/30/2015
	Estimate the number and type of families that will benefit from the proposed activities	Fifty (50) low to moderate income homeowners will receive exterior home maintenance and/or safe rooms and storm shelters.
	Location Description	City-wide, with priority for properties located within the SNI neighborhoods and the NRSA.
	Planned Activities	Exterior maintenance and installation of storm shelters
3	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: \$587,242
	Description	Provide CDBG funding to Community Action Agency (CAA) to fund emergency home repairs for a minimum of one hundred (100) homes for low to moderate income homeowners to address immediate threats to life, health and safety.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	A minimum of one hundred (100) 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.
4	Project Name	Targeted Area DPA
	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: \$560,000
	Description	Provide HOME funds for down payment and closing costs assistance up to \$15,000 for low and moderate income homebuyers within the SNI neighborhoods and the NRSA.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	Sixty (60) low to moderate income homebuyers will receive down payment and closing costs assistance within targeted neighborhoods.
	Location Description	Funding is restricted to the SNI and NRSA neighborhoods.
	Planned Activities	Down Payment and closing costs assistance to low and moderate income homebuyers.

5	Project Name	Non-Target Area Down Payment Assistance
	Target Area	
	Goals Supported	Downpayment and Closing Costs Assistance-HOME
	Needs Addressed	Affordability of Owner-Occupied Housing
	Funding	HOME: \$140,000
	Description	Provide HOME funding for down payment and closing costs assistance to fifteen (15) low to moderate income homebuyers in non-targeted neighborhoods.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	fifteen (15) low to moderate income homebuyers will receive down payment and closing costs assistance.
	Location Description	Funding is restricted to non-targeted areas of the city.
	Planned Activities	Down payment and closing costs assistance.
6	Project Name	CHDO Set-Aside: New Construction
	Target Area	
	Goals Supported	CHDO New Construction/Rehab- HOME
	Needs Addressed	Supply of Affordable Owner-Occupied Housing
	Funding	HOME: \$1,180,907
	Description	Provide HOME funding for new construction or rehabilitation of a minimum of eight (8) housing units through Community Housing Development Organizations (CHDO's) and non-profit housing providers (JPNA, NHS, OKC Housing Services Redevelopment Corp).
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	A minimum of eight (8) low to moderate income families will achieve homeownership.
	Location Description	City-wide
	Planned Activities	New construction and/or rehabilitation
7	Project Name	CHDO Set-aside: Loan Pool
	Target Area	

	Goals Supported	CHDO New Construction/Rehab- HOME
	Needs Addressed	Supply of Affordable Owner-Occupied Housing
	Funding	HOME: \$641,679
	Description	CHDO Set-aside allocated to local CHDO's for multiple projects, both rehab and new construction. All funds allocated through the CHDO Loan Pool must be repaid.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	Actual estimates of production cannot be provided until all funds have been allocated. Estimating fourteen (14) units of homeowner housing for low and moderate income families based on historical fund activity.
	Location Description	City-wide
	Planned Activities	Rehab and new construction
8	Project Name	Multifamily Rental Rehab-CDBG
	Target Area	
	Goals Supported	Multi-Family Rehab- CDBG
	Needs Addressed	Supply of Affordable Rental Housing
	Funding	CDBG: \$1,097,753
	Description	Provide CDBG funding for the rehabilitation of a minimum of eight (8) multifamily or other rental units.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	Eight (8) low to moderate income households will access or maintain affordable multifamily rental housing.
	Location Description	City-wide
	Planned Activities	Rental Rehab-Multifamily
9	Project Name	Rehabilitation of Public Housing Units
	Target Area	
	Goals Supported	Rehabilitation of Public Housing Units- CDBG
	Needs Addressed	Quality of Public Housing
	Funding	CDBG: \$234,897

	Description	Provide CDBG funding to the Oklahoma City Housing Authority (OCHA) for the rehabilitation of a minimum of fifteen (15) public housing units.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	Fifteen (15) 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
10	Project Name	ESG Activities
	Target Area	
	Goals Supported	Housing for the Chronically Homeless- ESG Homeless Youth Facilities -ESG Housing Sustainability for the Homeless- ESG Homeless Persons Employment- ESG Homeless Households with Children- 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: \$389,641
	Description	ESG Funds will be used for the following Activities: 1) To increase housing and case management resources for chronically homeless individuals, families, and veterans by a minimum of twenty (20) units. 2) To provide support for the development of one (1) Drop-in facility for homeless youth. 3) To increase the percentage of previously homeless persons staying in permanent housing for at least six (6) months by at least 3%, or 593 individuals. 4) To assist 130 participants in the Continuum of Care program in finding and maintaining employment. 5) To decrease the number of homeless households with children by providing rapid re-housing and prevention resources for eighty (80) families.
	Target Date	6/30/2016

	Estimate the number and type of families that will benefit from the proposed activities	It is projected that 823 extremely low income households and individuals will receive access to housing and case management services. This total does not include a proposed Drop-in center for homeless youth since that activity has not been previously funded and there is no historical data available to project the number of beneficiaries.
	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 a public facility for homeless youth.
11	Project Name	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 two hundred (200) locations in low and moderate income neighborhoods as a crime prevention activity.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	Graffiti will be removed at two hundred (200) 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
12	Project Name	OKC Abandoned Housing
	Target Area	
	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 125 vacant and abandoned properties to eliminate slum and blight on a spot basis.
	Target Date	6/30/2016

	Estimate the number and type of families that will benefit from the proposed activities	125 vacant and abandoned homes will be secured in low and moderate income neighborhoods to remove imminent threats to life, health and safety. A greater community benefit exists; however, cannot be quantitatively measured apart from the properties secured.
	Location Description	City-wide
	Planned Activities	Secured vacant buildings
13	Project Name	CAA Small Business Services
	Target Area	
	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 a minimum of ninety (90) small businesses.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	Ninety (90) small businesses will be provided with technical assistance.
	Location Description	City-wide
	Planned Activities	Small business technical assistance.
14	Project Name	CDBG Economic Development RLF
	Target Area	
	Goals Supported	Small Business Revolving Loan Fund- CDBG
	Needs Addressed	Economic Opportunities for Low and Moderate Income
	Funding	CDBG: \$750,000
	Description	Provide revolving loan fund (RLF) assistance to a minimum of four (4) businesses or microenterprises to create jobs and/or expand commercial services for low-mod benefit or limited clientele. This activity was capitalized with prior year CDBG funding. No additional contributions are anticipated.
	Target Date	6/30/2016

	Estimate the number and type of families that will benefit from the proposed activities	A minimum of four (4) new or expanding businesses or microenterprises will be supported resulting in job creation and/or job retention. The amount of employees added or retained will vary based upon the size and needs of the businesses supported.
	Location Description	City-wide
	Planned Activities	Financial support for business start-ups and expansions
15	Project Name	HUD Section 108 Loan- 21C Museum Hotel
	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	The City has applied for a Section 108 loan to support the development of the 21C Museum Hotel in the historic Film Row District. If approved, the assistance received will support the creation of 138 FTE jobs in a future program year. The allocated funding is the anticipated debt service on outstanding Section 108 loans. In addition, an Embassy Suites hotel funded in prior years was completed in the Spring 2015, resulting in the creation of 77 FTE jobs which will be reported in the first Action Plan year. The City will consider other projects for use of Section 108 as opportunities arise. The allocated funding noted below is the anticipated debt service on outstanding Section 108 loans which would be payable to HUD from CDBG entitlement funds if a financed project were to fail. If all loans are repaid timely, no funds will be expended for this activity.
	Target Date	1/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	With the completion of the 21C Museum Hotel, 138 FTE jobs will be created for low and moderate income persons. An Embassy Suites hotel financed in prior years was completed in 2015, resulting in 77 FTE jobs.
	Location Description	City-wide
Planned Activities	Hotel development and job creation	
16	Project Name	Empowerment Zone Staff Support
	Target Area	
	Goals Supported	Empowerment Zone Staffing- CDBG
	Needs Addressed	Economic Opportunities for Low and Moderate Income
	Funding	:

	Description	The City will continue to provide staff support for continued implementation of the Empowerment Zone designation, if the program is extended beyond December 31, 2014 with a future legislative action. No funding is allocated at the present time.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	The Empowerment Zone designation expired on December 31, 2014 and has not yet been extended. No beneficiaries have been identified as future of the program is unknown.
	Location Description	Restricted to the EZ eligible boundaries.
	Planned Activities	Administration-Staff Support
17	Project Name	COTPA (Embark) Share-a-Fare Program
	Target Area	
	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 13,000 subsidized taxi fares and bus tokens for approximately five hundred (500) low and moderate income special needs populations, including the homeless, elderly persons over age 62, and persons with disabilities.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	13,000 discounted taxi fares and bus tokens will be provided to approximately five hundred (500) persons with special needs.
	Location Description	City-wide
	Planned Activities	Discounted taxi fare and bus coupons for low and moderate income special needs populations.
18	Project Name	HOPWA Short Term Rent, Mortgage, and Utility Assistance
	Target Area	
	Goals Supported	STRMU for Persons with HIV/AIDS- HOPWA
	Needs Addressed	Housing Availability-Persons With HIV/AIDS
	Funding	HOPWA: \$265,476

	Description	Funding is provided for Short Term Rent, Mortgage and Utility (STRMU) assistance to prevent homelessness for eighty-eight (88) eligible persons or households.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	Eighty-eight (88) low or extremely low income persons will be assisted with rental assistance to prevent homelessness.
	Location Description	City-wide
	Planned Activities	Short term rental assistance to prevent homelessness.
19	Project Name	HOPWA Tenant Based Rental Assistance
	Target Area	
	Goals Supported	TBRA for Persons with HIV/AIDS- HOPWA
	Needs Addressed	Housing Availability-Persons With HIV/AIDS
	Funding	HOPWA: \$265,476
	Description	Tenant Based Rental Assistance (TBRA) will be provided to seventy-five (75) low or extremely low income households to prevent homelessness.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	Seventy-five (75) low or extremely low income households will receive short term rental assistance to prevent homelessness.
	Location Description	City-wide
	Planned Activities	Short term rental assistance to prevent homelessness.
20	Project Name	OCURA Affordable Housing Development
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Affordable Housing-AHDP and RHP- CDBG and HOME
	Needs Addressed	Supply of Affordable Owner-Occupied Housing Supply of Affordable Rental Housing
	Funding	CDBG: \$75,000
	Description	Administrative support to Oklahoma City Urban Renewal Authority (OCURA) for the development of affordable housing.
	Target Date	6/30/2016

	Estimate the number and type of families that will benefit from the proposed activities	Funding is for administrative support. Beneficiaries will be reported under individual project activities.
	Location Description	City wide, with priority to project developments within the NRSA, SNI neighborhoods and Urban Renewal Areas.
	Planned Activities	Administrative support for affordable housing development.
21	Project Name	Midtown Neighborhood Improvement Project
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure
	Funding	CDBG: \$50,000
	Description	Prior year public infrastructure activity to provide street lighting in the Midtown neighborhood for pedestrian safety.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	Public infrastructure project to provide pedestrian lighting for all populations.
	Location Description	Midtown District
	Planned Activities	Street lighting
22	Project Name	Community Dev Program- Public Facilities/Infrastructure-CDBG
	Target Area	
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Sustainability Service Provider Facilities-CDBG
	Funding	CDBG: \$1,462,861
	Description	Funding reserved but not yet allocated to support public facilities, housing, infrastructure improvements, and needs of social service providers. Several applications for funding have been received but have not yet been fully vetted by staff.
	Target Date	6/30/2017

	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that any facility supported will provide benefits to a minimum of two hundred (200) persons annually.
	Location Description	City-wide
	Planned Activities	TBD
23	Project Name	Economic Opportunity-Urban Renewal Authority
	Target Area	
	Goals Supported	Multi-Family Rehab- CDBG Affordable Housing-AHDP and RHP- CDBG and HOME
	Needs Addressed	Acquisition/Clearance of Vacant, Blighted Property
	Funding	CDBG: \$788,880
	Description	Funding to increase the sustainability of Oklahoma City Urban Renewal Authority close out districts and local Urban Renewal project areas to include acquisition, disposition, relocation, and Urban Renewal completion to address slum and blight.
	Target Date	6/30/2017
	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
24	Project Name	Metro Fair Housing Council
	Target Area	
	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.
	Target Date	6/30/2016

	Estimate the number and type of families that will benefit from the proposed activities	Funding will support approximately 432 Housing Complaint Intakes, 37 Formal Housing Discrimination Complaints, 35 Fair Housing/Fair Lending Rights Seminars, 50 Requests for Reasonable Accommodation or Modification, and 52 Fair Housing Tests.
	Location Description	City-wide
	Planned Activities	Fair Housing activities
25	Project Name	Administration-Planning
	Target Area	
	Goals Supported	Administration
	Needs Addressed	Administration
	Funding	CDBG: \$150,000
	Description	Administration-Planning activities to support the CDBG program including preparation of neighborhood plans, the annual Action Plan, the Consolidated Annual Performance Evaluation Report (CAPER) and the five year Consolidated Plan.
	Target Date	6/30/2016
	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: \$646,479 HOME: \$417,402
	Description	Administrative expenses for CDBG and HOME program operations and management.
	Target Date	6/30/2016

	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	Rental Housing Program- Central Urban Development
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Affordable Housing-AHDP and RHP- CDBG and HOME
	Needs Addressed	Supply of Affordable Rental Housing
	Funding	HOME: \$225,000
	Description	Construction of six (6) affordable rental units from prior year funding for low to moderate income families under the Rental Housing Program.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	Six (6) low to moderate income households will gain access to an affordable rental unit.
	Location Description	Funding restricted to the NRSA.
	Planned Activities	Construction of affordable rental units.
28	Project Name	SNI Non-Profit Housing Construction
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	CHDO New Construction/Rehab- HOME
	Needs Addressed	Supply of Affordable Owner-Occupied Housing
	Funding	HOME: \$250,000
	Description	HOME funding to support the construction of three (3) new homes for sale to low-moderate income households in the SNI neighborhoods.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	Three (3) low to moderate income households will achieve homeownership.
	Location Description	Funding restricted to the SNI neighborhoods.

	Planned Activities	New construction of for-sale housing
29	Project Name	AHDP- Homeless Alliance Project
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Affordable Housing-AHDP and RHP- CDBG and HOME Housing for the Chronically Homeless- ESG
	Needs Addressed	Supportive Housing for the Chronically Homeless
	Funding	HOME: \$670,000
	Description	Funding was provided in prior program years to assist in the clearance and site improvement activities using CDBG funds, and construction funding using HOME funds in support of a twenty (20) unit Single Room Occupancy (SRO)apartment building to provide permanent supportive housing for the chronically homeless. The project is expected to be completed during the first Action Year.
	Target Date	1/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	Twenty (20) formerly homeless individuals will gain access to permanent supportive housing.
	Location Description	WestTown Campus, 1724 NW 4th St, Oklahoma City, OK
	Planned Activities	New construction, site clearance, site improvements
30	Project Name	AHDP- Mitchford Project
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Affordable Housing-AHDP and RHP- CDBG and HOME
	Needs Addressed	Supply of Affordable Owner-Occupied Housing
	Funding	HOME: \$217,726
	Description	Prior year funding to support the construction of nine (9) new single family homes for sale to low and moderate income buyers in the SNI neighborhoods.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	Newly constructed single family homes will be sold to Nine (9) low to moderate income homebuyers
Location Description	Funding is restricted to the SNI neighborhood.	

	Planned Activities	New construction of for-sale housing
31	Project Name	AHDP- Ron Walters Project
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Affordable Housing-AHDP and RHP- CDBG and HOME
	Needs Addressed	Supply of Affordable Owner-Occupied Housing
	Funding	HOME: \$7,500
	Description	Prior year funding to assist in the construction of three (3) single family homes for sale to low and moderate income buyers in the SNI neighborhoods.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	Three (3) low to moderate income homebuyers will achieve homeownership.
	Location Description	Funding is restricted to the SNI neighborhoods.
		Planned Activities
32	Project Name	SNI Program Whole House Rehabs-HOME
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Whole-House Rehabilitation-HOME
	Needs Addressed	Quality of Affordable Owner Housing
	Funding	HOME: \$1,152,385
	Description	HOME Funding to support the rehabilitation of fifteen (15) whole-house rehabs in the SNI neighborhoods.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	Fifteen (15) low to moderate income families will receive needed repairs to facilitate a suitable living environment.
	Location Description	Funding is restricted to the SNI neighborhoods.
		Planned Activities
33	Project Name	Hazardous Tree Removal

	Target Area	NEIGHBORHOOD STRATEGY 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.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	Forty-two (42) 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
34	Project Name	Public Services- Education Programs
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure
	Funding	CDBG: \$15,000
	Description	CDBG funds provided to assist in general public service educational efforts for youth, crime and health topics.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	One hundred (100) low to moderate income persons will receive public services education
	Location Description	Funds are restricted to SNI Neighborhoods
	Planned Activities	Public Services-General education topics
35	Project Name	Legal Assistance to Homeowners and Non-Profit Organizations
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG

	Needs Addressed	Public Facilities, Services and Infrastructure
	Funding	CDBG: \$24,000
	Description	CDBG funds provided for legal ownership and title clearance assistance for low-moderate income homeowners and non-profit organizations.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	Fifteen (15) low to moderate income homeowners and three (3) non-profit organizations will obtain legal assistance
	Location Description	Funds restricted to the SNI neighborhoods
	Planned Activities	Public Services-Legal assistance
36	Project Name	Sidewalks and Street lighting - SNI
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure
	Funding	CDBG: \$350,000
	Description	CDBG funds provided for sidewalks and street lighting in the SNI Neighborhoods.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	Fifty (50) low to moderate income homeowners will benefit from new sidewalks and/or street lighting improvements
	Location Description	Funds are restricted to the SNI neighborhoods
	Planned Activities	Public Infrastructure-Sidewalks and street lighting
37	Project Name	Public Facilities-Tree Planting
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure
	Funding	CDBG: \$10,000

	Description	CDBG funds provided to assist in tree planting efforts in SNI neighborhoods.
	Target Date	6/30/2016
	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.
	Location Description	Funds are restricted to the SNI neighborhoods
	Planned Activities	Public Facilities-Tree Planting
38	Project Name	Public Facilities- Park Improvements
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Public Facilities, Srvcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure
	Funding	CDBG: \$1,474,813
	Description	CDBG funds to support park improvements in SNI neighborhoods. Actual amount budgeted is \$1,000,000. The remaining \$474,813 is SNI contingency funds and will be allocated as need among CDBG eligible activities in SNI neighborhoods.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	Two (2) parks in the SNI neighborhoods will be assisted with public facility improvements.
	Location Description	Funds are restricted to the SNI neighborhoods
	Planned Activities	Public Facilities- Park Improvements
39	Project Name	Public Facilities- 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: \$40,000

	Description	CDBG funding to support SNI neighborhood-led public facilities improvements.
	Target Date	6/30/2016
	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
40	Project Name	Public Services- After School Programs SNI
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Public Facilities, Svcs, Infrastructure-SNI CDBG
	Needs Addressed	Public Facilities, Services and Infrastructure Strengthen Neighborhood Capacity
	Funding	CDBG: \$250,000
	Description	CDBG funding to support summer and after-school programming and tutoring for students in the two (2) SNI neighborhoods.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	Five Hundred (500) students in SNI neighborhoods will be provided access to tutoring and after-school programming.
	Location Description	Funds are restricted to the SNI neighborhoods
	Planned Activities	Public Services- After school programming and tutoring
41	Project Name	Public Services-Legal Assistance
	Target Area	Strong Neighborhoods Initiative
	Goals Supported	Public Facilities, Svcs, Infrastructure-SNI CDBG
	Needs Addressed	Quality of Affordable Owner Housing Affordability of Owner-Occupied Housing
	Funding	CDBG: \$24,000

Description	Provide legal fee assistance to homeowners and or non-profit organizations in SNI neighborhoods using CDBG funds to assist in resolving title and probate issues to enable refinancing, home equity loans, and/or sale to third parties.
Target Date	6/30/2016
Estimate the number and type of families that will benefit from the proposed activities	Approximately fifteen (15) low income homeowners and/or non-profit organizations will receive legal assistance to resolve title and probate issues.
Location Description	Funding is restricted to SNI neighborhoods.
Planned Activities	Resolution of title and probate issues for low income homeowners

AP-50 Geographic Distribution – 91.220(f)

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

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

The City of Oklahoma City applied for and received a Neighborhood Revitalization Strategy Area (NRSA) designation from HUD that consists of all or part of 45 low-income census tracts covering an area of approximately 29.5 square miles. In addition, the NRSA contains approximately 20 square miles that lie within an area designated by HUD as both an Enterprise Community and an Empowerment Zone (Round III). Both designations have expired as of December 31, 2014. 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 STRATEGY AREA	80

Table 60 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

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

positive impact over the long term.

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

Discussion

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

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The objectives of the 2015-2019 Consolidated Plan 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.

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

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

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

The one year housing goals noted below are based on proposed goals and activities for the 2015-2016 Annual Action Plan year. It is anticipated that these annual goals will be largely consistent over the five (5) year term of this Plan, provided that annual allocations are not substantially reduced. The estimates provided do not include the provision of emergency shelter, transitional shelter, or social services. The numbers for rehabilitation include whole house rehab, public housing unit rehabs, storm shelter installation, and emergency home repairs. Units purchased using down payment assistance are included in the production of new units field.

One Year Goals for the Number of Households to be Supported	
Homeless	183
Non-Homeless	309
Special-Needs	0
Total	492

Table 61 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	163
The Production of New Units	126
Rehab of Existing Units	203
Acquisition of Existing Units	0
Total	492

Table 62 - One Year Goals for Affordable Housing by Support Type

Discussion

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

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

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

Programs to Assist Homeowners:

- CDBG Emergency Home Repair Program
- CDBG Exterior Maintenance and Storm Shelter Program
- HOME Housing Rehabilitation Program
- Lead-based paint abatement in conjunction with the three previous listed programs
- Section 8 Homeownership Program.

Projected 2015-2016 Housing Accomplishments:

- 100 Emergency home repairs
- 50 Exterior Maintenance projects
- 30 Whole house rehabilitation projects
- 75 Down Payment Assistance Loans
- 8 CHDO Homes Constructed
- 6 CUDI Rentals Constructed
- 1 OCURA Home Constructed
- 3 Non-Profit SNI Homes Constructed
- 8 Multi-family Unit Rehabs
- 15 Public Housing Unit Rehabs

- 13 Homes Constructed for Rental
- 163 Person Provided Rental and/or Utility Assistance
- 20 SRO Units Constructed

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.

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

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

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

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

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

Not Applicable

Discussion

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

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

Introduction

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

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

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

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

Activities supported in the first Action Plan Year to address homelessness include CDBG and HOME funding for the completion of a twenty (20) unit SRO project on the WestTown homeless campus for persons transitioning to permanent housing. HOPWA funding is used to support the provision of Short Term Mortgage and Utility Assistance (STRMU) and Tenant Based Rental Assistance (TBRA). ESG funds continue to support housing and case management activities for families and veterans. ESG funding is also committed for rapid re-housing and prevention services for homeless households with children. Lastly, ESG funding will support the creation of one drop-in center for homeless youth.

Addressing the emergency shelter and transitional housing needs of homeless persons

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

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

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

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

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

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

Service providers in the community who partner with the City direct homeless persons to the appropriate services and financial assistance needed to achieve independent living. This may include assistance in obtaining permanent housing, medical treatment, mental health treatment, counseling,

supervision, and other government or private assistance available such as:

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

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

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

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

The assigned case manager will typically contact the landlord or utility company immediately in an effort

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

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

Discussion

The City of Oklahoma City and local service providers use the Homeless Management Information System (HMIS) to track services provided to the homeless, and to prevent duplication of resources.

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

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

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

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	88
Tenant-based rental assistance	75
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	163

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

Introduction:

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

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

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

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

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

- Adoption of the International Existing Building Code; This Code applies to multi-family housing and reduces financial barriers to renovating existing building by allowing greater flexibility in materials used in the renovation;
- The City has exempted impact fees for water and sewer in the core area of the city to reduce the cost of infill housing and other redevelopment efforts;
- The City has exempted the fees for permits to nonprofit builders of affordable housing;
- The City does not require engineering or architectural seals for nonprofit affordable housing

developers;

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

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

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

City Council has indicated a willingness to support changes to the existing ordinances to update protected class definitions. 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 is expected to be finalized 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. That said, all present zoning codes are being evaluated in the new Comprehensive Plan, providing the

City with an opportunity to identify potential ordinance language that could conceivably create an unintended consequence in the provision of fair housing. Problematic language, if found, will be altered as necessary to ensure compliance.

Discussion:

The City of Oklahoma City remains committed to ensuring equal housing opportunity for all persons. Proposed Action Plan activities for 2015-2016 provide direct funding for the provision of fair housing training, compliance, and complaint processing functions. It is anticipated that the new City Comprehensive Plan (PlanOKC) will be adopted during the program year. Staff will continue to monitor affordable housing barriers and provide resources where needed to ensure compliance.

AP-85 Other Actions – 91.220(k)

Introduction:

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

Actions planned to address obstacles to meeting underserved needs

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

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

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

Actions planned to foster and maintain affordable housing

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

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

Housing rehabilitation activities are provided through The Oklahoma City Housing Assistance Program

citywide with emphasis on the NRSA, and with specific attention to projects within the Strong Neighborhoods Initiative areas. Funding is allocated to conduct owner occupied whole house rehabilitation activities for eligible lower income households.

A priority for use of HOME and CDBG funding allocated for housing will be to reverse patterns of gentrification by incentivizing mixed income housing in and near the economic growth areas of the urban core, including the Downtown District, Bricktown, Core-to-Shore, Midtown, Film Row and Art District areas of the City. A second priority for use of both HOME and CDBG funding for housing will be 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.

Multifamily new construction or rehabilitation activities utilizing First Action Year funding will be conducted in partnership with the Oklahoma Housing Finance Agency's Low Income Housing Tax Credit Program.

Public Housing Modernization is provided through the OCHA. OCHA is allocated CDBG funds to make needed repairs to approximately 15 to 17 public housing units annually.

Actions planned to reduce lead-based paint hazards

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

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

CDBG funds are allocated to one or more organizations to provide technical assistance for organized neighborhoods in eligible low-income census tracts throughout the city. As a condition for receiving

capacity building funds, the City will require that neighborhood organizations in CDBG-eligible census tracts be alerted to the dangers of lead-based hazards particularly for children, and urge neighborhood campaigns to have children tested for elevated lead blood levels.

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

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

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

Actions planned to reduce the number of poverty-level families

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

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

The third MAPS initiative was passed by the citizens of Oklahoma City on December 2009. MAPS 3 projects are well underway and will continue the public facilities improvements that were started with

the first MAPS vote. MAPS 3 provided funding for a 70 acre downtown regional park, a 4.5 mile electric streetcar route, a new downtown convention center, neighborhood sidewalks and trails, aquatic centers for seniors, additional improvements to the Oklahoma State Fairgrounds and a white water course on the Oklahoma River.

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

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

Actions planned to develop institutional structure

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

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

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

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

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

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

Discussion:

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

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

Program Specific Requirements

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

Introduction:

Program Income-The City of Oklahoma City anticipates a return of approximately \$1,300,000 in CDBG program income prior to beginning of the program year, with an additional \$75,000 anticipated in 2015-16. \$23,543.52 in 2014 unprogrammed CDBG funds are available for allocation. Oklahoma City does not expect to receive program income during the program year from CDBG capitalized revolving loan funds or new float funded activities. Oklahoma City did capitalize a \$750,000 revolving loan fund as a new activity using CDBG funding in early 2015; however the program is still under development and no loan repayments are expected in the First program year. Oklahoma City has not invested CDBG funds in float funded activities. Program income that is received will be allocated as follows:

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

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

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

Surplus Funds- The City of Oklahoma City anticipates a return of approximately \$1,300,000 in CDBG

Program Income prior to the beginning of the First Action Plan year, with an additional \$75,000 anticipated in 2015-16. A total of \$133,121.13 in 2014 unprogrammed funds is available for allocation.

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

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

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

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

**Community Development Block Grant Program (CDBG)
Reference 24 CFR 91.220(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	1,300,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	140,546
5. The amount of income from float-funded activities	0
Total Program Income:	1,440,546

Other CDBG Requirements

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

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

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

Unallocated 2014-15 HOME funds in the amount of \$341,762.51 are available to re-allocate. 2015-16 HOME program income of \$95,000 is anticipated. HOME funds from 2014-15 in the amount of \$19,391 have been recaptured.

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

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

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

The City, as the participating jurisdiction, will recoup all or a portion of the HOME assistance to the homebuyers, if the assisted housing is transferred voluntarily or involuntarily during the period of affordability based on the availability of net proceeds. Net proceeds are defined as the sales price minus superior loan repayment (other than HOME funds) and any closing costs. Only the direct subsidy provided to the homebuyer, i.e., down payment and closing cost assistance and/or the difference between the fair market value of the property and a reduced sales price attributable to HOME funds, will be recouped pro-rata based on the forgivable loan terms and on the reduction during affordability period provided in the HOME regulations at 92.254(a)(5)(ii)(A)(2).

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

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

Emergency Solutions Grant (ESG) Reference 91.220(I)(4)

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

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

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

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

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

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

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

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

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

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

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

5. Describe performance standards for evaluating ESG.

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

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

Discussion:

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

In 2013, the City of Oklahoma City also joined the 100,000 Homes Campaign in an effort to move the most medically frail, chronically homeless individuals into permanent housing using a housing first approach. To accomplish this, members of the chronically homeless population are initially given a vulnerability index survey to determine their health issues. Those that are determined to be the most medically frail are prioritized for immediate placement into housing. A case management committee

comprised of various service providers identifies a case manager to work with each individual. Which provider the case manager is affiliated with depends on the needs of the individual being housed.

Since joining the campaign at the beginning of 2013, local non-profit service providers have collaborated to house over 217 chronically homeless individuals, exceeding their goal by more than 40%.

Appendix - Alternate/Local Data Sources

1	Data Source Name	Vacant and Abandoned Buildings Study- OKC
	List the name of the organization or individual who originated the data set.	GSBS Richman Consulting
	Provide a brief summary of the data set.	Data provided in the Richman study includes vacant, abandoned buildings (VAB's), percentages of VAB's in relation to other housing stock, length of vacancy, and geographical concentrations.
	What was the purpose for developing this data set?	In response requests from citizens for action on vacant properties, the City of Oklahoma City contracted with GSBS Richman Consulting to identify the scope of the problem, assess monetary costs, and provide a range of possible solutions.
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?	The study provides comprehensive data related to the number of vacant properties, both residential and commercial. An assessment of actual cost to the City for services provided is included in the report. The report also provides a geographic summary of the data by Wards.
	What time period (provide the year, and optionally month, or month and day) is covered by this data set?	The study was commissioned in 2012 and completed in June 2013. Calls in the City's E911 database were evaluated for the period from July 2007 thru June 2011. Employment and Foreclosures were evaluated for the years 2002-2011. Census data was analyzed for 2000 and 2010.
	What is the status of the data set (complete, in progress, or planned)?	The study was completed on June 26, 2013.
2	Data Source Name	2014 Analysis of Impediments to Fair Housing
	List the name of the organization or individual who originated the data set.	Western Economic Services, LLC
	Provide a brief summary of the data set.	The 2014 Analysis of Impediments to Fair Housing Choice was prepared by Western Economic Services, LLC as part of the 2015-2020 Consolidated Plan planning process, and as a requirement for receiving formula grants funding from the U.S. Department of Housing and Urban Development (HUD). The report addresses actions in Oklahoma City related to actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choice; and any actions, omissions, or decisions which have this effect.

What was the purpose for developing this data set?

As a requirement of receiving funds under the Community Development Block Grant (CDBG), the HOME Investment Partnership program (HOME), and the Emergency Solutions Grant (ESG), entitlement jurisdictions are required to submit certification to HUD of affirmatively furthering fair housing, including an Analysis of Impediments to Fair Housing Choice (AI), proposed actions to overcome the effects of impediments identified, and to maintain records reflecting the actions taken in response to the analysis. Impediments identified in the AI report and possible course of action to remedy are discussed in more detail in the Barriers to Affordable Housing section of this report.

Provide the year (and optionally month, or month and day) for when the data was collected.

The 2014 City of Oklahoma City Analysis of Impediments to Fair Housing Choice was completed on January 26, 2015.

Briefly describe the methodology for the data collection.

The Analysis of Impediments was conducted through the assessment of a number of quantitative and qualitative sources. Quantitative sources used in analyzing fair housing choice included:

- Socio-economic and housing data from the U.S. Census Bureau
- Employment data from the U.S. Bureau of Labor Statistics
- Economic data from the U.S. Bureau of Economic Analysis
- Investment data gathered in accordance with the Community Reinvestment Act (CRA)
- Home loan application data from the Home Mortgage Disclosure Act (HMDA)
- Housing complaint data from the U.S. Department of Housing and Urban Development (HUD)

Qualitative research included evaluation of relevant existing fair housing research and national and city fair housing legal cases. Additionally, the research included the evaluation of information gathered from several public input opportunities conducted in relation to the Analysis of Impediments report. This included the 2014 City of Oklahoma City Fair Housing Survey distributed to stakeholders, interested parties, and participants in the public input process.

Geographic analysis of racial and ethnic distribution were conducted by calculating race or ethnicity as the percentage of the total population, and then plotting the data on a geographic map of Census tracts in the City of Oklahoma City. For the purposes of the report, maps were produced for both 2000 and 2010 Census data in order to examine how the concentrations of those populations changed over time.

Ultimately, a list of potential impediments was drawn from the above referenced sources and further evaluated based on HUD's definition of impediments to fair housing choice. Potential impediments to fair housing choice present within The City of Oklahoma City were identified; along with actions the city may consider in attempting to address possible impediments.

	<p>Describe the total population from which the sample was taken.</p> <p>As part of the essential review of the background context of the City of Oklahoma City markets in which housing choices are made, detailed population and demographic data were included to describe the City's residents. The data summarized not only the protected class populations, but also characteristics of the total population for the entire city. The data assisted in determining whether over-concentrations of racial and ethnic minorities exist, and if so, which areas of the City are most affected.</p>
	<p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>As previously mentioned, further evaluation of the status of fair housing within the City of Oklahoma City was conducted via an online 2014 Fair Housing Survey which was completed by sixty-one (61) stakeholders and citizens. Those solicited for participation included a wide variety of individuals in the fair housing arena. Respondents were asked to provide their related role in the fair housing process. Of those surveyed, twelve (12) respondents were local government employees, eleven (11) were advocates/providers, seven (7) were property managers, four (4) were in construction, four (4) provided legal assistance, and three (3) identified as service providers. Sixteen (16) respondents recorded "other role".</p>
3	<p>Data Source Name</p> <p>Comprehensive Economic Development Strategy</p> <hr/> <p>List the name of the organization or individual who originated the data set.</p> <p>The CEDS was produced by the Association of Central Oklahoma Governments (ACOG), in consultation with TIP Strategies, Inc.</p> <hr/> <p>Provide a brief summary of the data set.</p> <p>The CEDS provides a regional economic and demographic assessment of central Oklahoma communities within four (4) metro counties (Canadian, Cleveland, Logan and Oklahoma Counties). The purpose of this assessment was to arrive at a common understanding of the region's unique economic strengths, weaknesses, opportunities, and threats. The preliminary data analysis represents the first step in the planning process and forms part of the foundation for subsequent economic development plans. The socio-economic assessment for the region includes demographics, migration, economy, innovation, workforce, and occupational data.</p>

What was the purpose for developing this data set?

The Comprehensive Economic Development Strategy (CEDS) was created to provide guidance on enhancing the efforts of existing organizations and redefining the role of ACOG in becoming a vital economic development partner for the central Oklahoma region. The CEDS has identified four (4) primary goals to enhance regional economic development:

1. Retain and expand existing businesses, and attract new businesses in the central Oklahoma region
2. Coordinate economic development efforts with regional partners
3. Develop, retain, and attract talent
4. Enhance and promote quality of place.

While each of these goals was chosen for its ability to leverage distinct opportunities in central Oklahoma, they are also intentionally chosen for their ability to support one another.

Provide the year (and optionally month, or month and day) for when the data was collected.

The Comprehensive Economic Development Strategy for Central Oklahoma was completed in August 2012.

	<p>Briefly describe the methodology for the data collection.</p> <p>After acquiring a grant from the U.S. Economic Development Agency (EDA), ACOG hired TIP Strategies, Inc., an economic development consulting firm in Austin, Texas, to assist in crafting strategies that leveraged the four-county region's key opportunities. The findings and recommendations in the final report serve as a framework for guiding regional economic development initiatives and the allocation of public and private resources to enhance central Oklahoma's economic development efforts. To conduct their work, TIP toured the region, met with key stakeholders, analyzed economic development and demographic trends, and reviewed relevant planning documents.</p> <p>A number of data sources were used in preparation of the report, including:</p> <ul style="list-style-type: none"> • Population: Historical estimates of population by county from the U.S. Census Bureau, as prepared by Moody Analytics. • Unemployment: Data from the U.S. Bureau of Labor Statistics' household survey, via Moody's Analytics. • Employment and Occupation: Employment and occupational analyses were performed using Strategic Advantage, a suite of web-based analysis tools created by Economic Modeling Specialists, Inc. (EMSI). The data provided, in most cases, represents "complete" employment, rather than "covered" employment typically produced by state and federal workforce agencies. Unlike covered employment which includes only those industries covered by unemployment insurance, complete employment includes estimates of all industries. Employment data in the report is presented in accordance with the North American Industry Classification System (NAICS). The system was developed under the direction of the Office of Management and Budget (OMB) as the standard for use by federal statistical agencies in classifying business establishments for the collection, tabulation, presentation, and analysis of statistical data describing the U.S. economy. Occupation data in the report is categorized using the Standard Occupational Classification (SOC) system.
	<p>Describe the total population from which the sample was taken.</p> <p>Economic data was gathered from all four (4) counties in the Central Oklahoma region. In 2010, the regional population stood at approximately 1.1 million, an increase of 142,000 over the 2000 Census count.</p>
	<p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>Demographics were mapped based upon age distribution, occupational trade, net migration and major economic employment sectors for the entire four-county population</p>
4	<p>Data Source Name</p> <p>2013 ACS Survey Households and Families</p>

<p>List the name of the organization or individual who originated the data set.</p> <p>U.S. Census Bureau</p>
<p>Provide a brief summary of the data set.</p> <p>2013 American Community Survey 1-Year Estimates Households and Families, Report no. S1101</p>
<p>What was the purpose for developing this data set?</p> <p>The S1101 ACS report was accessed to identify the number of households with children present. CHAS data did not populate in Table 12.</p>
<p>Provide the year (and optionally month, or month and day) for when the data was collected.</p> <p>Report was accessed via the American Fact Finder website on April 9, 2015.</p>
<p>Briefly describe the methodology for the data collection.</p> <p>Although the American Community Survey (ACS) produces population, demographics and housing unit estimates, it is the U.S. Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties. Access to this data was obtained through the internet at:</p> <p>http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_13_1YR_S1101&prodType=table.</p>
<p>Describe the total population from which the sample was taken.</p> <p>Data was collected for the Oklahoma City, Oklahoma Metropolitan Statistical Area.</p>
<p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>The report includes total households, number of families and summary of children by age, selected household type and housing tenure.</p>