

The City of Oklahoma City

2024-2025 Fifth Year Action Plan

Substantial Amendment 1

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



Plan Submission Date: July 5, 2024

Substantial Amendment 1 Submission: TBD



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Executive Summary

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

1. Introduction

The City of Oklahoma City (the City) is a federal Entitlement Community under the U.S. Department of Housing and Urban Development (HUD). As such, the City receives annual formula Community Development Block Grant (CDBG), Home Investments Partnership Program (HOME), Emergency Solutions Grant (ESG) and Housing Opportunities for Persons with AIDs (HOPWA) grants. As a condition of funding, the City is required to prepare a Consolidated Plan (Plan) every five (5) years for submittal to HUD. The purpose is to provide an updated community-based analysis of current demographic, economic, and public policy trends, and reassessment of the needs of low- and moderate-income populations relating to housing, shelter, public service, and economic development opportunities. This analysis, along with input received during a comprehensive citizen and stakeholder consultation process, forms the foundation of the City's five (5) year strategic plan for addressing unmet community needs. Each year of the five (5) year strategy, the City must prepare an annual Action Plan to inform citizens and HUD of planned activities. At the end of each fiscal year, the City must prepare a Consolidated Annual Performance Evaluation Report (CAPER) that provides an assessment of annual performance in the context of the five (5) year Consolidated Plan and Annual Action Plan.

The CDBG program goals are 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. Regulations require that each activity undertaken must meet one of three (3) National Objectives: Benefit people with low and moderate incomes, Aid in the prevention or elimination of slums and blight, or Meet an urgent need (such as earthquake, flood, or tornado relief).

The HOME program supports the development of affordable housing, expands the capacity of affordable housing developers, and leverages private sector investment.

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.

HOPWA is the only Federal program dedicated to addressing the housing needs of persons living with HIV/AIDS and their families.

This 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. The Plan prioritizes housing as a primary objective, specifically within the Neighborhood Revitalization Strategy Area (NRSA) and the Strong

Neighborhoods Initiative (SNI) neighborhoods where 80% of available grant resources are targeted. Each Action Plan Year, funding recommendations are reviewed and vetted according to the goals and objectives of the Consolidated Plan.

Substantial Amendment 1: Substantial Amendment 1 reallocates funds from non-specific line items to specific activities. Allocations in this amendment will be available for obligation into the 2025-26 Fiscal Year. The Substantial Amendment allocates additional funding to Walnut Development, specifies SNI activities, allocates funds to a new in-house Emergency Repair Program, and allocates HOME funds to CHDO developments and housing in SNI areas. A detailed description of the changes is included in AP-20 Goals and Objectives and AP-35 Projects.

2. Summarize the objectives and outcomes identified in the Plan

The 2024-25 Fifth Annual Action Year Plan addresses housing and community development needs and provides support to homeless persons and special populations in Oklahoma City. In this Plan, The City continues our approach of concentrating resources strategically within the Strong Neighborhood Initiative (SNI) areas to promote a holistic approach to neighborhood revitalization. In the Fifth Action Year Plan, The City continues to emphasize affordable housing, with specific emphasis on the Neighborhood Revitalization Strategy Area (NRSA). Special consideration will also be given to supporting projects in LMI census areas within the Opportunity Zones (see Appendices 5b and 5c).

HOME funding has been allocated for down payment assistance to low to moderate income homebuyers, affordable housing construction/rehabilitation, and rehabilitation of owner-occupied homes. CDBG funds support public service activities which continue to be a priority of the community. Funding has been allocated for free and reduced bus and taxi fares for special populations, securing abandoned houses, after school programming, hazardous tree removal, healthcare for homeless, advocacy for children in foster care, and public education. Several public facilities projects are underway and/or in various steps of planning, including new sidewalks, trail connections, a community plaza, and park improvements in SNI neighborhoods. Continued investment in public facilities projects remains a focus in this Fifth Action Year Plan; most notably, \$200,000 in CDBG funds are allocated to support construction of a new community center. \$383,025 is being made available for future public facilities proposals.

The City of Oklahoma City continues to support economic development and slum/blight removal activities using CDBG funding. CDBG funded activities include small business training; support for the Urban Renewal Authority (to include slum and blight removal, urban renewal completion). A Pest Inspection and Treatment Program was established in FY 2022-23 to remediate severe infestation for HOME-assisted Whole House Rehabilitation Program activities prior to construction. \$22,400 for that program is being allocated from previously unobligated funds in the new program year. CDBG funds continue to support Fair Housing and planning activities.

ESG funding continues to support a myriad of activities to address chronic homelessness, and HOPWA funds have been allocated to provide Tenant Based Rental Assistance (TBRA) and Short-Term Rent,

Mortgage, and Utilities assistance, emergency and permanent housing and supportive services to persons with HIV/AIDS.

3. Evaluation of past performance

The City's 2020-24 Consolidated Plan responded to community **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- to moderate income households; and, funding for activities that support the City's housing rehab program, and housing and services for persons with HIV/AIDS. Activities undertaken in the first four years of the Consolidated Plan addressed these goals and are on target to meet projected outcomes; albeit somewhat slower than projected.

The goal of providing a **suitable living environment** was addressed in the 5-year Consolidated Plan, and the first four Action Year strategies by continuing ongoing programs that addressed specific community needs. The 2024-25 Fifth Year Action Plan strategy calls for 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; and, removal of slum and blight conditions in low-income areas. These programs are much needed and continue to expend funds timely.

In addition, the City of Oklahoma City made progress in attaining its goals for **expanding economic opportunities**. The City's Consolidated Plan, and first four Annual Action Year Strategies called for engaging in program activities that provide technical assistance to small businesses in obtaining financing and investing Section 108 Loan Guarantee funds in businesses to create jobs for low- and moderate-income persons. A Section 108 loan application for the renovation of the historic First National Building was submitted to and approved by HUD in FY 2021-22. Repayments began during the Third Action Year Plan, and job creation goals were substantially met in the Fourth and Fifth Action Plan years.

4. Summary of Citizen Participation Process and consultation process

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

The consultation process for this Plan provided several opportunities for residents, service providers, citizen's committees, and others to contribute. On December 22, 2023, the City published a Notice of Public Meetings for two (2) community input sessions held at local libraries. Meetings were held in-person for the first time since the pandemic. The meetings were held in January 2024 with one meeting during the afternoon to accommodate persons working evening hours. A total of fifteen (15) citizens and representatives of local organizations and service providers participated in these meetings. Instructions for offering subsequent feedback and comments were provided. Six (6) Community Development staff members were present at the January 23rd meeting and three (3) at the January 25th meeting to assist with questions and comments.

Over the last 5 years there has been an increasingly high community focus on persons experiencing homelessness, which continues today. In 2019, the Mayor initiated a Homelessness Task Force, and the City hired Analytic Insight to assess existing conditions, and to develop a Comprehensive Strategy. Stakeholders were interviewed, public planning sessions were held, and focus groups convened to examine current systems. A Public Forum was held on December 16th, 2020, to vet community concerns. In September 2021, the City Council accepted a report prepared by Analytic Insight detailing 24 strategies to enhance delivery of homeless services. Since then, Clutch Consulting has been engaged to work with the City to develop an implementation strategy and the City formed and filled a new position to coordinate the effort. The Oklahoma City Key to Home Partnership was subsequently created as a collaborative team of service providers, local government, community leaders and funders with a mission to prevent and end homelessness. As one component, the Key to Home Partnership piloted an encampment-rehousing program in 2022. This is an intentional, structured effort to offer individuals in established encampments safe and dignified housing solutions prior to closing an area or reactivating it for general use. With 90% of the participants in the pilot program moving into housing with supportive services, the program is expanding. The goal is to provide housing and wraparound services for 500 unsheltered people by 2025.

5. Summary of public comments

Citizen input received from the public meetings and from the CCCD meeting described above related to several different topics. Questions and comments are itemized in the attached Appendix 2. The most common comments expressed a desire to pursue an expansion of the NRSA, additional funding for affordable housing; specifically for those persons who are presently experiencing homelessness, more flexible uses of Downpayment Assistance (DPA) for costs such as interest rate buydowns and payment of points, and an increase in the DPA subsidy to accommodate significant increases in average sale prices and construction costs. Increased funding for public service programs remains a need, and increased funding and easier access to services provided through the housing Emergency Repair Program were requested.

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

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

All comments were received and evaluated. Comments that were not accepted generally proposed activities that did not meet the regulatory requirements and/or could not be adequately funded with available resources. All public feedback was given due consideration, although not every requested activity could be supported. In general, in the Fifth Year Action Plan, overall funding was insufficient to address all the requests, and the public service cap also limited some potential increases that might have been otherwise considered.

7. Summary

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 FY 2024-25 Fifth Year Action Plan. Although the expressed needs continue to exceed available resources, citizen feedback obtained from community input meetings is used to inform the City's annual goals and objectives to the greatest extent possible. Public service activities continue to be a high priority with limited resources available.

A minor or substantial amendment to this Annual Action Year Plan may be required, as the City adapts to changing needs and priorities within the program year. A substantial amendment to an Annual Action Year Plan is defined as an amendment that a.) Changes the priorities in the 5-Year Strategy; b.) Funds a new activity not described in the Action Plan; or c.) Increase funding allocated to an activity by more than 25%. In the event an amendment is required, the City will follow the terms and conditions of its Citizen Participation Plan to allow for public comment.

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

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

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

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 Annual Action Year Plans, and for administering programs covered by the Plan is the Housing & Community Development Division of The City of Oklahoma City, Planning Department.

Consolidated Plan Public Contact Information

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

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

1. Introduction

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

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

The City routinely communicates with the Oklahoma City Housing Authority (OCHA) to understand their programs and needs. The City continues to provide them with limited CDBG funding each year to rehabilitate approximately twelve (12) public housing units as indicated within our Action Plan. In addition, this year’s plan continues to reserve an allocation of HOME funding for the Creston Park Neighborhood redevelopment project that OCHA should be initiating in 2024. The City is also a current partner and co-applicant with OCHA in its recently awarded Choice Neighborhoods Initiative Planning Grant for development of a comprehensive Transformation Plan for the Will Rogers Courts housing complex and the surrounding Stockyards/Rotary Park neighborhood. Further, OCHA has been designated as the operator of our MAPS 4 funding earmarked for housing to decrease homelessness; a \$55.7M award funded through a voter approved sales tax. In this role, OCHA will act to administer funding, project management and oversight, and will be the owner and asset manager of properties. OCHA will be working with local service organizations to provide supportive services, and with the City to both rehabilitate or replace some of OCHA’s existing housing stock, as well as develop new affordable housing for our community.

The City interacts routinely with the Oklahoma Housing Finance Authority (OHFA) as we direct clients to Section 8 programs and coordinate data sharing. In the past City grant funds have provided additional funding to support selected LIHTC projects. Also, periodic meetings are held with representatives of OHFA, OCHA, the City, and the Alliance for Economic Development to discuss program issues, potential funding sources, and affordable housing concerns. Both OHFA and OCHA representatives were included in development of the City’s Affordable housing study and continue to be involved in discussions relating to the City’s e Housing Affordability Implementation Plan that is underway.

The City collaborates with our Continuum of Care (CoC) subrecipients to provide various types of assisted housing. Some homeless service providers in the CoC specialize in assisting individuals with mental health

concerns. Case managers with these organizations receive SSI/SSDI Outreach, Access, and Recovery (SOAR) training and connect eligible clients to appropriate SSI/SSDI benefits. All the community mental health centers in the City collaborate with CoC housing providers and two of the mental health centers also provide housing and case management to CoC recipients. This year, the City restructured the Continuum of Care Board (aka The Key To Home Board) to expand it in size and in scope to be more inclusive of service providers and potential funders that would support homeless services.

In 2019, the Mayor established a new Task Force on Homelessness to examine and address community needs. Task Force members represent a variety of social service agencies including mental health providers, the housing authority, city program staff, and philanthropic funding agencies. A consultant was hired to examine our local assets and gaps in providing homelessness services to develop a Comprehensive Strategy to address homelessness. This strategic plan was presented to and accepted by the City Council in September 2021. Public meetings were included as part of this effort as were a series of workshops held with stakeholders to discuss issues in February 2020. Clutch Consulting group has been engaged to coordinate with stakeholders and develop an implementation strategy for the plan recommendations, and those efforts are ongoing. Additionally, the City created a new position to coordinate implementation strategy efforts. New programs have recently been initiated to strengthen outreach capacity, and an initiative to decommission camps by moving all residents of a selected camp directly into housing is underway. The Mental Health Association Oklahoma, the Homeless Alliance, and City Care are partners in providing an enhanced outreach component. The program goal is to house 500 persons currently living on the streets within the next few years.

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 is the lead agency for the Oklahoma City Continuum of Care (CoC). This year the City has restructured the CoC governing Board to be larger and more inclusive, and to expand the scope of its conversation concerning the needs of, and programs to address, homelessness. The City continues to emphasize Coordinated Entry through the Key to HOME program, a collaborative initiative that combines the efforts of over forty (40) government, faith-based, and non-profit organizations to address homelessness. The CoC routinely realizes a housing retention rate of over 85%. Housing homeless veterans is an emphasis of the program, and the CoC coordinates with the VA for VASH vouchers and case management, and with Community Service Council as the local provider of Supportive Services for Veteran's Families (SSVF).

The City and our service providers have been using a "housing first" approach for our chronically homeless and homeless veteran populations since 2013. We developed a need-based coordinated entry program for both populations. Of those placed in permanent housing, the City has realized a client retention rate between 80-90%. While the City has permanent housing programs that focus on assisting homeless families, the most extensive services are provided via ESG through prevention and re-housing assistance.

Families are assessed through the same Coordinated Entry System used for veterans and the chronically homeless. ESG and CoC staff assess clients and Coordinated Entry refers them to the provider that can meet their needs generally based on assessment scores. The services provided through ESG are those most often required by homeless families and generally make supportive housing a necessity. If an individual or family demonstrates they are at imminent risk of homelessness, ESG agencies can address immediate concerns and provide case management to prevent a loss of housing.

Homeless youth may also access housing and services through the Coordinated Entry System and are prioritized for housing based upon their demonstrated level of need. In the last 5 years, the CoC has seen rapid expansion in services. The Fourth Year Action Plan included a FY 2022-23 allocation of \$1 million to SISU from the CDBG Public Facilities program to assist in the expansion of an emergency shelter and drop-in center for homeless youth. Construction is completed and these funds were fully expended during the FY 2023-24 Fourth Action Year Plan. The City was also the recipient of the Youth Homelessness Demonstration Program (YHDP) which began at the end of 2022. This added new drop in, host home, diversion, permanent supportive housing, and transitional + rapid rehousing projects to the CoC's collection of youth services.

Over the last 5 years, the CoC has seen significant improvements in efficiency of outreach and shelter services, Point In Time (PIT) planning, and data collection; as well as in housing and case management services for all subpopulations. This can be attributed to the presence of CoC staff on service workgroups and committees. The City Planning staff and the Homeless Alliance organize and conduct the annual PIT count of the Homeless each January with the assistance of recruited volunteers. This year the program gained efficiencies by using field tablets to input information on survey participants. The PIT information is used in the annual HUD CoC competition. The information obtained from the PIT count is used to establish need and identify current trends, including people who are chronically homeless and families with children. The PIT count conducted in January 2024 reflects an increase of over 26% in total number of persons experiencing homeless, albeit a small decrease in the unsheltered count. The 2024 count was conducted on January 25, 2024. The final report is nearing completion.

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

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

The geographic area served by ESG is the same as the Oklahoma City Continuum of Care (CoC) ESG funded agencies are considered members of the CoC 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 Allocations Committee ranks/determines funding allocations and CoC staff monitor financial and programmatic elements of both CoC and ESG funded projects. CoC staff provides feedback on strengths and weaknesses as well as provides information to the Allocations Committee so they may determine funding allocations.

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

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

1	Agency/Group/Organization	Metropolitan Fair Housing Council
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Fair Housing Enforcement
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email Consultation and Fair Housing Survey participation. Identification of issues related to Fair Housing will inform this Action Year Plan and future program activities.
2	Agency/Group/Organization	OKLAHOMA CITY HOUSING AUTHORITY
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Needs - Veterans Non-Homeless Special Needs

	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 continues to provide CDBG funding to support the rehabilitation of about twelve (12) 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 priority needs and the proposed funding for the FY 2020-2024 5-year Consolidated Plan, and the subsequent Annual Action Plan allocations during the 5-year plan period.
4	Agency/Group/Organization	COMMUNITY ACTION AGENCY OF OKLAHOMA/CANADIAN COUNTIES
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Health Services-Abuse and Addiction Recovery
	What section of the Plan was addressed by Consultation?	Homelessness Needs - Veterans Non-Homeless Special Needs Economic Development

	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The Community Action Agency (CAA) was consulted for the homeless housing 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 and small business services.</p>
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Table 2 – Agencies, groups, organizations who participated:

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

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

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

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

Narrative

The City of Oklahoma City maintains an ongoing dialogue with local non-profit and for-profit housing providers and developers to gauge housing needs in the metropolitan area. Solicitations for development proposals are drafted based upon current housing needs and community goals such as mixed income housing, deconcentration of poverty, infill development, and minimal design standards. Housing needs for very low-income families are identified through continuing discourse with the Oklahoma City Housing Authority. Current data and market trends in multifamily and commercial development are monitored through analysis of the Price Edwards & Company, Oklahoma City market studies which are released annually. A new housing market study, affordable housing study, and an analysis of impediments to fair housing were completed in FY 2019-20 to support work on the 2020-2024 Five Year Consolidated Plan.

Two (2) public meetings were held to discuss the FY 2024-2025 Fifth Action Year Plan in January 2024 at local libraries. The meetings were held in person. Participation in these meetings by local service providers and neighborhood associations included representatives from Tinker Federal Credit Union, Embark Transportation office, The Alliance for Economic Development, Positively Paseo, Community Action Agency, and Unlimited Vision. Input received during these public meetings are provided in the appendices of this report (Appendix 2).

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 municipal services in Oklahoma relies primarily on sales tax receipts and, thus, the City of Oklahoma City often finds itself in direct competition with suburban municipalities for new businesses.

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation.

Summarize citizen participation process and how it impacted goal-setting.

A Notice of Public Meetings was published in *The Oklahoman* on December 22, 2023, soliciting participation and feedback for the FY 2024-25 Fifth Action Year Plan. In addition, local stakeholders, non-profit organizations, and other interested parties were notified of the public meetings via email on January 9, 2024. Meetings were held at local libraries at 3:00 p.m. on January 23, 2024, and at 6:00 p.m. on January 25, 2024. Additional opportunities for public comment were provided at the Citizens Committee for Community Development meeting held at 3:30 p.m. on June 4, 2024. A final public hearing was held at the regular City Council meeting at 8:30 a.m. on July 2, 2024.

The citizen participation process and summary of feedback has been fully described in the Executive Summary, and due to character space restrictions cannot be duplicated here. Feedback received at the public meetings was used in conjunction with quantitative data and evaluation of current programs to establish priority needs for this Fifth Action Year Plan. Where possible, funding allocations and strategic goals were identified based on the most urgent community needs, and in support of goals and objectives identified in the 5-year Consolidated Plan. Staff will continue to evaluate needs throughout the program year. Funding allocations will be adjusted as needed to promote a strategic and targeted allocation of resources, with the intent of creating a noticeable and sustainable community benefit.

Substantial Amendment 1: A Public Hearing was held before the City Council on May 6, 2025, at 8:30 A.M. in the City Council Chambers to consider a Resolution amending the 2024-25 Fifth Year Action Plan. In addition to the public hearing, a public meeting of the Citizen’s Committee for Community Development heard and reviewed the proposed Substantial Amendment on April 22, 2025, at 3:30 PM. Citizens are welcome to attend and provide comments at either the public hearing or the public meeting. Notice of both meetings was published in the *Oklahoman* and on the City’s website on April 2, 2025.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meetings	Non-targeted/broad community Non-Profit Organizations and Service Providers	Two (2) public meetings were held for public comment and feedback on January 23, and January 25, 2024. The session on January 23, 2024 was	A summary of community feedback is attached in the appendices of this report (Appendix 2).	All comments and suggestions were given due consideration in the allocation process, although not all requests could be supported.	

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)
			scheduled at 3:00 p.m. to accommodate citizens working evening hours, and to provide an alternative time for representatives from local non-profits and service providers during normal business hours. Fifteen (15) community members attended the two sessions. Up to Six (6) City Community Development Staff members were present at each meeting.			
2	Newspaper Ad	Non-targeted/broad community	A Combined Notice of Thirty (30) Day Comment Period and Notice of Public Hearing was submitted to Oklahoma Publishing Company (OPUBCO) for publication on May 24, 2024 and printed on May 31 2024 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 Meeting Public Hearing	Non-targeted/broad community	In addition to the two (2) public meetings conducted for citizen input, the proposed Fifth Action Year Plan was also presented at a public meeting of the Citizens Committee for Community Development on June 4, 2024. The Plan as recommended by the	A summary of community and committee members feedback is attached in the appendices of this report (Appendix 2).	All comments and suggestions were given due consideration in the allocation process, although not all requests could be supported.	

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)
			CCCD was presented during a final public hearing at City Council on July 2, 2024.			

Table 3 – Citizen Participation Outreach

Expected Resources

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

Introduction

Fifth program year allocations, funds carried forward from prior program years, and program income estimates are based upon the most recent data available at the time of report submission. Final allocations of funding from the U.S. Department of Housing and Urban Development (HUD) were announced on May 7, 2024, and communicated via email by HUD. The CDBG allocation of \$5,055,205 represents a 3.00% increase from FY 2023. The HOME program received \$2,236,659; a noteworthy decrease of \$406,007 below last year's funding (15.36%). ESG funding of \$431,433 remains near the FY23 funding level, and HOPWA received an allocation increase of 3.14% to \$1,399,461.

The City's most recent Section 108 funded project was in 2021 for a loan transaction to partially fund the renovation of the historic First National Center. Job creation requirements under that loan agreement were recognized during the FY 2022 and FY 2023 Action Year Plans. If additional opportunities materialize during the term of this Consolidated Plan, Section 108 Loan Guarantee applications may be submitted to further the City's ongoing economic development initiatives.

Supplemental HOME ARP funding provided in response to the COVID-19 pandemic in prior years will be carried forward. ESG-CV and HOPWA-CV funding have been expended. Guidance received from HUD requires that all CV and ARP funding be received, managed, and allocated under the FY19 CARES ACT Substantial Amendment. **Resources allocated in this Plan are funded solely through regular formula grant funding allocations;** however, it should be noted that some duplication may exist in beneficiary projections, primarily in assistance to the homeless and supportive services.

Anticipated Resources (*exclusive of CV, ARPA, and ARP allocations*)

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	*Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	5,055,205	0	\$2,850,016	7,905,221	7,905,221	Prior year resources include 2023-24 funds obligated/under contract and distribution of funds reallocated and recaptured. Amount available remainder of ConPlan = FY24 available funds since this is last year of the ConPlan). *Please note that CDBG Program income receipted in FY 2023-24 in the amount of \$94,105 is included in the prior year resources column as unobligated funds available for allocation.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder 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	2,236,659	0	7,747,023	9,983,682	9,983,682	Prior year resources include funds carried forward from prior program years of \$7,747,023. Expected amount available for remainder of ConPlan = FY24 funds available since this is last year of the ConPlan. *Please note that HOME Program income receipted in FY 2023-24 in the amount of \$230,860 is included in the prior year resources column as unobligated funds available for allocation.
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	1,399,461	213,000	0	1,612,461	1,612,461	Expected amount available for remainder of ConPlan = FY24 funds available since this is last year of the ConPlan..
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	431,333	0	0	431,333	431,333	Expected amount available remainder of ConPlan = FY24 funds available since this is last year of the ConPlan.

Table 4 - 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 of HOME funds to be granted or loaned to Community Housing Development Organizations (CHDOs) for new home construction and rehabilitation/sale activities. In this Fifth Action Year Plan, The City has chosen to increase the CHDO capacity well beyond the minimum 15% set-aside to \$2,632,737. This includes the statutory 15% (\$335,499) plus an additional \$459,316 from unobligated FY 2023 funds and \$1,837,923 in obligated funds carried forward from prior program years. CHDOs are encouraged to utilize private bank financing along with CHDO HOME funds (some provided as grants and some as loans) in providing affordable housing. Proposals for new projects are generally accepted when the CHDO has completed all previously funded projects. The City facilitates the transfer at no cost, of Oklahoma County owned vacant lots when available, to nonprofit organizations for the construction of affordable housing. The lots are provided to the City through an agreement with Oklahoma County.

The City also provides local funding (general funds- Social Services Grants,) to agencies that provide services to the homeless. Match for ESG programs is required to be generated by the service providers who utilize these funds. 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 supports the achievement of home ownership and has proved effective in creating significant interest among private lenders. During the 2022-2023 reporting period, the City leveraged its Down Payment Assistance (DPA) program funds with private financial institution mortgage investments totaling \$1,912,767. The use of DPA in the 2023-24 program year has increased, despite an increase in housing costs and significant increases in mortgage rates which make housing less accessible to low and moderate- income families. The new allocation for DPA in this Fifth Year Action Plan includes an increase of \$800,000 over last year's budget.

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. In past years, OHFA has provided bonus points for applications that receive a minimum level of funding support from the local community. At present no bonus points are awarded for local support, so funds have not been specifically allocated for this purpose in the recent Action Plans. Developers may apply for funding in response to a Request for Proposals to develop affordable housing that is issued when sufficient HOME funds exist; such RFP was made available in the FY 2023 Fourth Action Plan year and is expected to be reissued early in the Fifth Action Plan Year.

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

The Oklahoma City Urban Renewal Authority (OCURA) still owns much property in the northeast area of the city and seeks to develop many of their sites with mixed-income housing projects. Additionally, OCURA still owns numerous single infill lots and has an open solicitation for persons to develop housing; those lots are offered at a minimal sale price. Beyond this, OCURA will continue the redevelopment of

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

The City owns 105 residential lots on the north side of Northwest 10th Street between Ellison Avenue to the east, and Virginia Avenue to the west. The eastern thirty-six (36) lots between Blackwelder and Ellison Avenues were offered in a Request for Proposals (RFP) released on March 25, 2015 to solicit project proposals for residential, commercial and/or mixed-use development on these sites. The selected developer defaulted on the Development Agreement and the lots were returned to the City in May 2019. Efforts are on-going to identify a suitable development project for this site; some percentage of affordable housing is anticipated if housing is developed. The lots made available for a project is expected to include the additional sixty-nine (69) lots between Blackwelder and Virginia Avenue to the west. The development timeline is presently unknown.

Discussion

The Required 25% HOME program match contributions in recent program years has been significantly reduced due to Presidential Disaster Declarations and COVID-related HUD match reductions for severe fiscal distress. 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. However, The City of Oklahoma City continues to prioritize funding of projects that leverage private capital and non-federal funding.

Annual Goals and Objectives

Goal Descriptions

AP-20 Annual Goals and Objectives

1	Goal Name	Affordable Housing Construction and Development
	Goal Description	<p>CDBG funds in the amount of \$168,275 in obligated/unspent funds are carried forward from FY 2023 to support infrastructure development on Walnut Street. In addition, \$100,000 in FY 2024-25 Entitlement funds are provided to Walnut Street for a total budget of \$268,275.</p> <p>HOME funds are allocated for several projects. A Request for Proposals (RFP) is expected to be issued for new affordable housing under the HOME Affordable Housing Development Program. It is estimated that the future RFP will result in development of approximately 75 units in future program years. Available funding includes \$1,757,795 reallocation of projected unobligated funds from prior program years and \$627,494. in FY 2024-25 funding for a total allocation of \$2,385,290 to be reserved for housing projects. A portion of the funds is expected to be reserved for housing projects in the SNI areas.</p> <p>Funds in the amount of \$660,000 are expected to be obligated to Hillcrest Green Apartments in the Fifth Action Plan Year in support of a 43-unit LIHTC senior housing development. These funds are allocated for FY 2024-25. Funds in the amount of \$254,729 have been allocated to Progress OKC. This includes \$4,729.01 previously obligated and carried forward from FY 2023-24, and a proposed FY24 allocation of \$250,000 for construction and sale of two additional SF homes for Low-moderate income buyers. Progress OKC will provide a total of four (4) single family homes for sale to LM buyers during the program year. \$800,000 in unobligated funds has been carried forward from FY 2023-24 and reallocated for Creston Park Phase I. The Creston Park project is expected to provide 170 assisted units in 2025. An allocation of \$1.2 million is projected to be allocated to the OCHA Vita Nova project to support 75 units of supportive housing in the FY24 Fifth Action Plan Year Unallocated CHDO funds in the amount of \$1,837,923 will be carried forward from FY 2023-24 unobligated funds. An additional \$459,316 will be provided from previously unobligated funds. The activity will also be funded with the statutory 15% set-aside of \$335,499 for a total Unallocated CHDO budget of \$2,632,737. The JPNA CHDO will carry forward \$742,373 in FY 2023-24 obligated/unspent funds. The Paseo CHDO will carry forward \$755,550 in FY 2023-24 obligated/unspent funds. The Neighborhood</p>

		<p>Housing Services CHDO was allocated \$340,000 from FY 2023-24 funds in April of 2024; these funds will carry forward to the Fifth Action Year Plan</p> <p>Substantial Amendment 1: Allocation of \$400,000 from the HOME Investments Partnership Program (HOME) Affordable Housing Development Program (AHDP) to a new, specific activity: SNI MLK New Construction Single Family Homes. These funds are for the construction of two new homes in the Martin Luther King, Jr neighborhood. Allocation of \$600,000 from the HOME AHDP to Alley's End to support the construction of affordable housing in the Automobile Alley District. Allocation of \$1,000,000 from the HOME AHDP to CHDO. These funds will be used to continue housing development in Walnut Village and to construct four new homes in the SNI Capitol Hill neighborhood.</p>
2	Goal Name	Affordable Housing Retention and Rehabilitation
	Goal Description	<p>A total budget of \$750,000 in HOME funding is provided from re-allocation of unobligated FY 2023-24 funds for the Whole house Rehabilitation Program to rehab an estimated ten (10) homes for low to moderate income households.</p> <p>CDBG funds support multiple housing retention programs. \$24,000 is allocated from previously unobligated funds for the Pest Inspection and Treatment Program which assists infested units that are served under the HOME program Whole House Rehabilitation Program. The City's Housing Exterior Maintenance Program is allocated \$1.2 million. This amount is inclusive of a new FY 2024-25 allocation of \$580,000, an allocation of \$100,000 from unobligated FY 2023-24 funds, and \$520,000 unobligated/unspent funds carried forward from FY 2023-24. A separate allocation of \$675,000 for program delivery costs is also made from FY 2024-25 new entitlement funds to support costs of inspections, work write ups, bid administration, etc. related to projects. An estimated forty-eight (48) households will be served.</p> <p>\$235,000 is provided to OCHA from a reallocation of unobligated FY 2023-24 CDBG funds for the rehabilitation of approximately twelve (12) public housing units. \$600,000 is allocated from FY 2024-25 entitlement funds to the City's Emergency Repair Program to assist approximately forty-five (45) low to moderate income homeowners.</p> <p>Substantial Amendment 1: Allocation of \$325,000 from the OKC Housing Assistance - Exterior Maintenance Program line to a new, specific activity for the Emergency Home Repair Parallel Pilot Program.</p>

3	Goal Name	Homebuyer Financial Assistance
	Goal Description	HOME funds in the amount of \$1,042,574 will be used to assist approximately fifty (50) low to moderate income homebuyers. This includes \$242,574 in FY 2023-24 obligated/unspent funds and \$800,000 in new FY 2024-25 entitlement funds.
4	Goal Name	Elimination of Slum and Blight
	Goal Description	CDBG funds in the amount of \$788,880 have been allocated from FY 2024-25 entitlement funds to the Oklahoma City Urban Renewal Authority (OCURA) to assist with urban renewal completions, property maintenance and disposition. \$250,000 is made available for spot blight thru the City's Abandoned Buildings Program to secure vacant and abandoned properties. Of this amount, \$150,000 is allocated from obligated/unspent funds and \$100,000 is reallocated from previously unobligated funds.
5	Goal Name	General Public Services-CDBG
	Goal Description	<p>CDBG funds are used to support multiple public service activities. A significant allocation of \$420,000 is provided from FY 2024-25 entitlement funds to support public service activities in our SNI neighborhoods. This program provides several different services, including but not limited to neighborhood capacity building, youth services and after-school programs, hazardous tree removals and summer youth programs. CDBG funds in the amount of \$105,000 are allocated to COTPA from FY 2024-25 entitlement funds to provide discounted bus and taxi fares, and courier services to special populations. \$65,000 is allocated from FY 2024-25 entitlement funds to Community Health Centers (CHCI) to provide healthcare for the homeless. \$40,000 is provided to CASA from FY 2024-25 entitlement for child advocacy services within the foster care system.</p> <p>Substantial Amendment 1: Allocation of \$45,000 to a new, specific activity for CDBG SNI Public Service: Neighborhood Cleanup Safe and Tidy. These funds will come from the SNI Public Service line. Allocation of \$170,000 to a new, specific activity for SNI Public Service: Hazardous Tree Program. These funds will come from the SNI Public Service line and the Community Development Block Grant (CDBG) General Public Facility line item. This represents an increase to SNI Public Services of \$146,712.50.</p>
6	Goal Name	Public Facilities and Infrastructure
	Goal Description	<p>CDBG funds are allocated for the support of various public facilities activities.</p> <p>An allocation of \$200,000 from unobligated/unspent funds is provided to Alpha Community Foundation to support construction of the Garden Oaks Community Center.</p>

		<p>Funds in the amount of \$1.2 million are allocated for SNI. This allocation includes \$338,284 in obligated funds carried forward from FY 2023-24, \$447,954 reallocation from previously unobligated/unspent funds and \$413,762 in new FY 2024-25 entitlement funds. These funds will support neighborhood grant projects, tree plantings, park improvements, Capitol Hill Plaza construction, alley improvements, a trail connection, and new sidewalks in the Capitol Hill and Metro Park neighborhoods.</p> <p>An allocation of \$383,025 is allocated for a future undefined PF project(s). This funding includes \$365,003 from previously unobligated FY 2023-24 funds and \$18,022 from new FY 2024-25 entitlement funds. These funds may be made available under an open solicitation for eligible projects, or allocated at the discretion of City HCD Staff for eligible PF activities.</p> <p>Substantial Amendment 1: Additional allocation of \$100,000 from the Community Development Block Grant (CDBG) General Public Facility line item to Jefferson Park / Positively Paseo Walnut Development Infrastructure. This funding is in addition to \$100,000 already allocated in the current Fiscal Year. A total of \$200,000 is eligible to carry forward into the 2025-26 Fiscal Year. These funds will be used for infrastructure development and public art in Walnut Village.</p> <p>Allocation of \$450,000 to a new, specific activity for SNI Public Facilities: Metro Park Sidewalks – Phase III. These funds will come from the SNI Public Facilities line and the Community Development Block Grant (CDBG) General Public Facility line item. This represents an increase to SNI Public Facilities of \$268,188.88.</p> <p>Allocation of \$450,000 from the SNI Public Facilities line to a new, specific activity for SNI Public Facilities: Capitol Hill Sidewalks – Phase IV.</p> <p>Allocation of \$49,250 from the SNI Public Facilities line to a new, specific activity for SNI Public Facilities: Neighborhood Grants.</p>
7	Goal Name	Economic Development
	Goal Description	<p>CDBG funds in the amount of \$40,000 have been allocated to the Community Action Agency from FY 2024-25 new entitlement funds for small businesses services. \$100,000 from previously unobligated funds is allocated for a Section 108 loan contingency funds to hedge the City’s risk in the event that loan repayments are insufficient to timely remit scheduled payments to HUD. \$300,000 is provided to NewView Oklahoma in support of a waterline extension which will assist in retention of 100 jobs. This funding includes \$100,000 from previously unallocated FY 2023-24 funds and \$200,000 from FY 2024-25 entitlement funds.</p>

8	Goal Name	Support for the Homeless
	Goal Description	ESG (\$431,333) and HOPWA (\$1,612,461) funds are used to provide housing, services, and case management to prevent and respond to persons in a housing crisis. HOPWA funds include FY 2023-24 funds carried forward in the amount of \$213,000 and FY 2024-25 entitlement funds of \$1,399,461.
9	Goal Name	Administration Planning and Fair Housing
	Goal Description	<p>HOME and CDBG funding is allocated for the management and administration of federal programs. CDBG admin funds in the amount of \$45,000 are allocated from FY 2024-25 entitlement funds and are used to support planning activities. \$93,000 from CDBG entitlement funds is allocated in FY 2024-25 for Fair Housing investigations. \$873,040 in CDBG entitlement funds are allocated for administration (exclusive of Planning and Fair Housing allocations).</p> <p>The HOME program administrative allocation provides \$258,352 in funding. This includes \$34,686. allocated from previously unobligated Fy 2023-24 funds and \$223,665 in FY 2024-25 new entitlement funding.</p> <p>All beneficiaries are reported under individual projects and activities, with the exception of persons assisted with Fair housing investigations (est. 400 Households).</p>

Table 5 – Goals Summary

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

This year's goals include the production of 101 new affordable housing units. Of this amount, eighty-three (83) are LIHTC units for families at or below 60% of Area Median Income (AMI). The Plan also anticipates fifty (50) homebuyers at or below 80% AMI will receive assistance with downpayments and closing costs.

Additional projects will begin construction in FY 2024-25; however, completion and lease up are not expected during the Fifth Year Action Plan period. Future affordable housing units supported with FY 2024-HOME funds include 170 assisted living units at Creston Park and seventy-five (75) units at Vita Nova for homeless persons with prior convictions. It is estimated that a future Affordable Housing Development Program solicitation will result in approximately thirty (30) new housing units.

AP-35 Projects – 91.220(d)

Introduction

The following initiatives and goals for the Fifth Action Year Plan are consistent with those established in the Five-Year Consolidated Plan with an effective date of July 1, 2020, and are compatible with the purposes set forth in **24 CFR Section 91.1**, that include:

- Affordable Housing Programs consisting of housing rehabilitation and new construction that focus on home ownership, programs to assist lower-income persons to attain home ownership; single and multi-family rental rehabilitation and new construction program activities.
- Economic Development activities targeting the low and moderate-income areas, and the Neighborhood Revitalization Strategy Area, including potential application(s) for Section 108 funds.
- Neighborhood improvement projects in low and moderate-income areas, Strong Neighborhoods Initiative areas, and the Neighborhood Revitalization Strategy Area.
- Assistance to the homeless and special needs populations through the Emergency Solutions Grant Program.
- Opportunities for Persons with HIV/AIDS and the Continuum of Care Program.
- Public facilities and services to assist special needs populations and persons with disabilities, including, but not limited to the elderly, senior citizens, chronically homeless individuals and families, sight-impaired persons, persons in drug and alcohol recovery, and persons diagnosed with permanent physical and mental disabilities.

The goals and objectives in this Fifth Action Year Plan specifically relate to the goals outlined in the 2020-2024 Consolidated Plan and the Department of Housing and Urban Development goals that include:

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

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

Oklahoma City's formula grant funding allocations, as recommended for adoption this Fifth Action Year Plan (fiscal year July 1, 2024 through June 30, 2025), follow the priorities established in the five-year Consolidated Plan that expires June 30, 2025. The Fifth Annual Action Year Plan strategy contains specific funding recommendations to implement the goals established in the five-year Plan to the greatest extent possible, depending on federal funding allocations awarded to The City of Oklahoma City.

The funding recommendations for the 2024-2025 Fifth Action Year Plan were considered by the Citizen’s Committee for Community Development on June 4, 2024 and received their favorable recommendation. Final Plan approval was granted by the City Council on July 2, 2024. **Please note that it is The City’s intent to expend carry-forward balances (when applicable) from this Fifth Action Plan Year past the June 30th program year expiration. Funds carried forward may include obligated year-end balances that have not yet been expended; and/or unobligated funds available for reallocation. This action will ensure continued operations of regularly funded programs and activities during the transition between program years. Expenditure of funds carried forward may occur prior to HUD approval of the future FY 2025 First Annual Action Year Plan.**

Projects

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

Table 6– Project Information

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

Administrative funds have been committed for Fair Housing Enforcement to respond to on-going concerns about tenants’ rights and evictions. The City continues to prioritize affordable housing and homelessness prevention and reduction activities. A sewer extension to serve a low mod area which has several vacant lots was approved as a public facilities activity in FY 2021; the project did not come to fruition due to acquisition challenges, and those funds were recaptured and reallocated to other activities in this Fifth Action Year Plan. CHDO expenses and performance is expected to increase in the upcoming year with construction on the Walnut Street housing development project; therefore, the City has chosen to increase the CHDO set-aside beyond the minimum 15% requirement by an additional \$1.8 million which is funded with resources carried forward from the FY 2023-24 program year. These funds will support the construction of new homes for low to moderate income households.

AP-38 Project Summary

Project Summary Information

1	Project Name	Affordable Housing Development Program
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Affordable Housing Construction and Development
	Needs Addressed	Creation and Retention of Affordable Housing
	Funding	CDBG: \$268,276 HOME: \$7,932,757
	Description	<p>CDBG funds in the amount of \$168,275.76 in obligated/unspent funds are carried forward from FY 2022 to support infrastructure development on Walnut Street. An additional \$100,000 is provided from FY 2024-25 entitlement funds for a total budget of \$268,276.</p> <p>HOME funds are allocated for several projects. A Request for Proposals (RFP) is expected to be issued for new affordable housing under the HOME Affordable Housing Development Program. Funding for housing proposals includes \$1,757,796 reallocation of projected unobligated funds from prior program years and \$627,494 in FY 2024-25 funding for a total allocation of \$2,385,290.</p> <p>Funds in the amount of \$660,000 are obligated to Hillcrest Green Apartments from FY 2024-25 entitlement funds in support of a 43-unit LIHTC senior housing development. Funds in the amount of \$254,729 have been allocated to Progress OKC. This includes \$4,729.01 previously obligated and carried forward from FY 2023-24, and a proposed FY24 allocation of \$250,000 for construction and sale of two additional SF homes for Low-moderate income buyers. Progress OKC will provide a total of four (4) single family homes for sale to LM buyers during the program year. \$800,000 in unobligated funds has been carried forward from FY 2023-24 and reallocated for Creston Park Phase I. The Creston Park project is expected to provide 170 assisted units in 2025. An allocation of \$1.2 million is projected to be allocated to the OCHA Vita Nova project to support 75 units of supportive housing in the FY24 Fifth Action Plan Year. It is estimated that the future RFP may result in development of approximately thirty (30) units in future program years.</p> <p>CHDO funds in the amount of \$1,837,923 will be carried forward from FY 2023-24 obligated funds (The JPNA CHDO is expected to carry forward about \$742,373 in FY 2023-24 obligated/unspent funds. The Paseo CHDO is expected to carry forward about 755,550 in FY 2023-24</p>

	<p>obligated/unspent funds. The Neighborhood Housing Services CHDO will carry forward \$340,000 in FY 2023-24 obligated/unspent funds.) An additional \$459,316 will be allocated from FY 2023-24 unobligated funds. The activity will also be funded with the statutory 15% set-aside of \$335,499 for a total Unallocated CHDO budget of \$2,632,738.</p> <p>Substantial Amendment 1: Allocation of \$400,000 from the HOME Investments Partnership Program (HOME) Affordable Housing Development Program (AHDP) to a new, specific activity, SNI MLK New Construction Single Family Homes, for the construction of two new homes in the MLK neighborhood. Allocation of \$600,000 from the HOME AHDP to Alley's End to support the construction of affordable housing in the Automobile Alley District. Allocation of \$1,000,000 from the HOME AHDP to CHDO. These funds will be used to continue housing development in Walnut Village and to construct four new homes in the SNI Capitol Hill neighborhood.</p>
Target Date	1/1/2027
Estimate the number and type of families that will benefit from the proposed activities	At least twelve (12) low to moderate income families will achieve homeownership in the Walnut Street LLC Village at Walnut project. These units include both HOME (CHDO) and CDBG support. Thirty (30) affordable housing units are expected be completed under the HOME program AHDP RFP over the next two program years; an additional 170 affordable units at Creston Park are expected and will be reported in a future program year. Forty-three (43) LIHTC units for seniors are expected at Hillcrest Green II in the FY 2023-24 program year. Seventy-Five (75) studio units for chronically homeless persons are expected to be completed at the Vita Nova facility in the FY 2025-26 program year under the next five-year Consolidated Plan. Four (4) single family homes are expected to be completed by Progress OKC in FY 2024-25.
Location Description	The Walnut Street LLC project is located at the intersection of NE 26th St and N. Walnut Ave. The Creston Park development is located near NE 28 th St and MLK. Two of the Progress OKC single family lots are located near NE 11 th Street and Euclid. The Vita Nova project is located at 1800 E. Reno Avenue. Future projects under the solicitation, new CHDO units, and the remaining two (2) Progress OKC unit sites remain to be determined.
Planned Activities	Assistance with infrastructure costs and construction for the development of affordable housing units in the Walnut Street LLC project, and new construction of proposed affordable housing projects

		at Hillcrest Green II, Vita Nova, Creston Park Suites, and TBD Single Family home sites.
2	Project Name	Affordable Housing Rehab/Retention
	Target Area	City-Wide
	Goals Supported	Affordable Housing Retention and Rehabilitation
	Needs Addressed	Creation and Retention of Affordable Housing Prevention and Elimination of Homelessness
	Funding	CDBG: \$2,734,000 HOME: \$750,000
	Description	<p>A total budget of \$750,000 in HOME funding is provided from re-allocation of unobligated FY 2023-24 funds for the Whole house Rehabilitation Program to rehab an estimated ten (10) homes for low to moderate income households.</p> <p>CDBG funds support multiple housing retention programs. \$24,000 is allocated from previously unobligated funds for the Pest Inspection and Treatment Program which assists infested units that are served under the HOME program Whole House Rehabilitation Program. The City's Housing Exterior Maintenance Program is allocated \$1.2 million. This amount is inclusive of a new FY 2024-25 allocation of \$580,000, a reallocation of \$100,000 from FY 2023-24 unobligated funds, and \$520,000 unobligated/unspent funds carried forward from FY 2023-24. A separate allocation of \$675,000 for program delivery costs is also made from FY 2024-25 new entitlement funds to support costs of inspections, work write ups, bid administration, etc. related to projects. An estimated forty-eight (48) households will be served.</p> <p>\$235,000 is provided to OCHA from a reallocation of unobligated FY 2023-24 CDBG funds for the rehabilitation of approximately twelve (12) public housing units. \$600,000 is allocated to the City's Emergency Repair Program from FY 2024-25 entitlement funds to assist approximately forty-five (45) low to moderate income homeowners.</p> <p>Substantial Amendment 1: Allocation of \$325,000 from the OKC Housing Assistance - Exterior Maintenance Program line to a new, specific activity for the Emergency Home Repair Parallel Pilot Program.</p>
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	An estimated forty-eight (48) homeowners will receive exterior maintenance repairs, ten (10) homeowners will receive whole-house rehabilitations, forty-five (45) homeowners will receive emergency repairs, an estimated twelve (12) public housing units will be

		rehabilitated, and an estimated eight (8) pest inspection treatments will be provided.
	Location Description	City wide, with emphasis in the NRSA.
	Planned Activities	Exterior maintenance repairs, emergency home repairs, whole-house rehabilitation, and rehab of public housing units.
3	Project Name	Down Payment Assistance Program
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Homebuyer Financial Assistance
	Needs Addressed	Creation and Retention of Affordable Housing
	Funding	HOME: \$1,042,574
	Description	HOME funds in the amount of \$1,042,574 will be used to assist approximately fifty (50) low to moderate income homebuyers. This includes \$242,574 in FY 2023-24 obligated/unspent funds, and \$800,000 in new FY 2024-25 entitlement funds.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	An estimated fifty - (50) homebuyers will be provided downpayment and closing cost assistance during the program year.
	Location Description	Funding is restricted to the Program boundaries with priority given to SNI and NRSA neighborhoods.
4	Planned Activities	Down Payment and Closing Costs assistance to low and moderate-income homebuyers.
	Project Name	Slum and Blight Remediation
	Target Area	City-wide
	Goals Supported	Elimination of Slum and Blight
	Needs Addressed	Slum and Blight Remediation
	Funding	CDBG: \$1,038,880
	Description	CDBG funds in the amount of \$788,880 have been allocated from FY 2024-25 entitlement funds to the Oklahoma City Urban Renewal Authority (OCURA) to assist with urban renewal completions, property maintenance and disposition. \$250,000 is made available for spot blight through the City's Abandoned Buildings Program to secure vacant and abandoned properties. Of this amount, \$150,000 is allocated from

		obligated/unspent funds, and \$100,000 is allocated from unobligated FY 2023-24.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	The number of program beneficiaries under the OCURA allocation is contingent on the type, size and scale of projects funded. The Abandoned Building Program is expected to secure approximately 150 properties.
	Location Description	Urban Renewal Project Areas, spot blight locations
	Planned Activities	Securing vacant and abandoned properties, acquisition, disposition, clearance, relocation, and Urban Renewal completion activities.
5	Project Name	SNI Public Services Activities
	Target Area	Strong Neighborhoods Initiative
	Goals Supported	General Public Services-CDBG
	Needs Addressed	Public Services
	Funding	CDBG: \$420,000
	Description	<p>A significant allocation of \$420,000 is provided to support public service activities in our SNI neighborhoods. This allocation includes \$420,000 from FY 2024-25 entitlement funds. This program provides several different services, including but not limited to neighborhood capacity building, youth services and after-school programs, neighborhood clean-up, and hazardous tree removals.</p> <p>Substantial Amendment 1: Allocation of \$45,000 to a new, specific activity for CDBG SNI Public Service: Neighborhood Cleanup Safe and Tidy. These funds will come from the SNI Public Service line. Allocation of \$170,000 to a new, specific activity for SNI Public Service: Hazardous Tree Program. These funds will come from the SNI Public Service line and the Community Development Block Grant (CDBG) General Public Facility line item. This represents an increase to SNI Public Services of \$146,712.50.</p>
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 400 students will be served thru the STEAM program. Approximately forty (40) hazardous trees will be removed, and twenty (20) households will benefit from neighborhood cleanups.
	Location Description	Designated Strong Neighborhoods Initiative neighborhoods (Metro Park, Capitol Hill, and MLK Jr).

	Planned Activities	After school programming, summer youth programs, and hazardous tree removals.
6	Project Name	SNI Public Facilities Activities
	Target Area	Strong Neighborhoods Initiative
	Goals Supported	Public Facilities and Infrastructure
	Needs Addressed	Public Facilities and Infrastructure
	Funding	CDBG: \$1,200,000
	Description	<p>Funds in the amount of \$1.2 million are allocated for SNI public facilities projects. This allocation includes \$338,284 from obligated/unspent funds, \$447,954 reallocated from previously unobligated funds, and \$413,762 in new FY 2024-25 entitlement funds. These funds will support neighborhood grant projects, tree plantings, park improvements, Capitol Hill Plaza design, alley improvements, a trail connection, and new sidewalks in the SNI neighborhoods. Up to \$136,000 of this allocation may be used for program delivery.</p> <p>Substantial Amendment 1: Allocation of \$450,000 to a new, specific activity for SNI Public Facilities: Metro Park Sidewalks – Phase III. These funds will come from the SNI Public Facilities line and the Community Development Block Grant (CDBG) General Public Facility line item. This represents an increase to SNI Public Facilities of \$268,188.88.</p> <p>Allocation of \$450,000 from the SNI Public Facilities line to a new, specific activity for SNI Public Facilities: Capitol Hill Sidewalks – Phase IV.</p> <p>Allocation of \$49,250 from the SNI Public Facilities line to a new, specific activity for SNI Public Facilities: Neighborhood Grants.</p>
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Sidewalk installation and park improvements will provide community-wide area benefit to approximately 3,214 households. Eighty (80) households will benefit from tree plantings. An estimated 3,214 households will benefit from SNI Neighborhood-led projects. 5,000 linear feet of sidewalks in Capitol Hill and Metro Park will serve 872 households.
	Location Description	Activities are limited to designated Strong Neighborhoods Initiative neighborhoods (Metro Park, Capitol Hill, and MLK Jr).

	Planned Activities	Sidewalk installation, park improvements, and tree planting
7	Project Name	Community Development-Public Services Activities
	Target Area	City-wide
	Goals Supported	General Public Services-CDBG
	Needs Addressed	Public Services Prevention and Elimination of Homelessness
	Funding	CDBG: \$210,000
	Description	CDBG funds in the amount of \$105,000 are allocated to COTPA from FY 2024-25 entitlement funds to provide discounted bus and taxi fares, and courier services to special populations. \$65,000 is allocated from FY 2024-25 entitlement to Community Health Services for services to the homeless. \$40,000 is provided to CASA from FY 2024-25 entitlement for child advocacy services within the foster care system.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Approximately fifteen (15) foster youth will be provided with advocacy resources. An estimated sixty (60) homeless persons will receive healthcare services. Approximately 63,000 discounted bus and taxi coupons will be provided to special populations (<i>Note: these represent vouchers provided, not persons served. Duplication can be expected</i>).
	Location Description	City-Wide
	Planned Activities	Foster Care Advocacy, Health care services for the homeless, transportation and courier services to special populations, and other eligible public service activities.
8	Project Name	Community Development- Public Facilities Activities
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Public Facilities and Infrastructure
	Needs Addressed	Public Facilities and Infrastructure
	Funding	CDBG: \$583,025
	Description	CDBG funds are allocated for the support of various public facilities activities. \$365,003 has been allocated from previously unobligated funds to support an undetermined community development public Facilities project. In addition, \$18,022.40 is allocated from FY 2024-25 entitlement funds for a total unobligated budget of \$383,025 . Support is also provided to Alpha Community Foundations for the Garden Oaks

		<p>Community Center. The Alpha project is allocated \$200,000 from previously unobligated funds to support construction.</p> <p>Substantial Amendment 1: Additional allocation of \$100,000 from the Community Development Block Grant (CDBG) General Public Facility line item to Jefferson Park / Positively Paseo Walnut Development Infrastructure. This funding is in addition to \$100,000 already allocated in the current Fiscal Year. A total of \$200,000 is eligible to carry forward into the 2025-26 Fiscal Year. These funds will be used for infrastructure development and public art in Walnut Village.</p>
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Projected beneficiaries of the Garden Ridge Community Center are difficult to quantify until programs and activities have been established. There will be an area wide benefit. Additional Beneficiaries may be realized through a future CDBG Program solicitation and/or future Public Facilities activity determined by staff; however, beneficiaries cannot be projected at the present time.
	Location Description	The Garden Ridge Community Center project is located at NE 1st Street and Bryant Avenue. Future project site(s) will be determined at a later date.
	Planned Activities	Infrastructure development and other eligible public facilities activities.
9	Project Name	Economic Development Programs
	Target Area	City-wide
	Goals Supported	Economic Development
	Needs Addressed	Economic Opportunity
	Funding	CDBG: \$440,000
	Description	CDBG funds are allocated to support economic development programs, including but not limited to small business services, \$40,000 is allocated to Community Action Agency to fund a small business training program. \$100,000 is allocated to provide a Section 108 loan contingency to ensure timely repayments to HUD. \$300,000 is provided to NewView Oklahoma for a waterline extension. These funds consist of \$100,000 from previously unallocated FY 2023-24 funds and \$200,000 from FY 2024-25 entitlement funds, to enable retention of 100 jobs.

	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 290 small businesses will receive training and technical assistance. It is not expected that any jobs will be created in this Fifth Action Plan year from Section 108 loan activities. An estimated 100 jobs will be retained at NewView Oklahoma.
	Location Description	City-Wide
	Planned Activities	Small business training, job creation, and installation of water line to facilitate job retention.
10	Project Name	Homeless Programs
	Target Area	City-wide
	Goals Supported	Support for the Homeless
	Needs Addressed	Creation and Retention of Affordable Housing Prevention and Elimination of Homelessness
	Funding	HOPWA: \$1,612,461 ESG: \$431,333
	Description	ESG funds are used to provide services, emergency and transitional housing, and case management resources for the prevention of homelessness. HOPWA funding is allocated to support housing and case management for person with HIV AIDS. Funded activities include, but are not limited to rapid-rehousing, homelessness prevention, emergency shelter, permanent and transitional housing placement, outreach services, services to assist victims of domestic violence and homeless youth, Veterans services, and associated case management. The FY 2024-25 ESG allocation is \$431,333 . The FY 2023-24 HOPWA allocation is \$1,399,461 . HOPWA is also expected to carry forward \$213,000 from FY 2023-23 for a total budget of \$1,612,461 .
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 1,200 households will receive various services to respond to a housing crisis, 135 persons will receive STRMU/TBRA assistance, 117 persons will access emergency shelter, 250 individuals will access homelessness prevention services, 1,180 persons will receive public services targeted to the homeless, and 350 persons with HIV AIDS will receive housing support and case management services thru HOPWA.
	Location Description	City-Wide
	Planned Activities	Rapid-rehousing, services to the homeless, TBRA, STRMU, emergency shelter, homelessness prevention activities, services to domestic

		violence victims and homeless youth, Veteran services, and case management.
11	Project Name	Program Administration and Planning
	Target Area	City-wide (Fair Housing)
	Goals Supported	Administration Planning and Fair Housing
	Needs Addressed	Administration and Fair Housing Activities
	Funding	CDBG: \$1,011,040 HOME: \$258,351
	Description	<p>HOME and CDBG funding is allocated for the management and administration of federal programs. CDBG admin funds in the amount of \$45,000 are allocated from FY 2024-25 entitlement funds, and are used to support planning activities. An allocation of \$93,000 is allocated in FY 2024-25 for Fair Housing investigations. \$873,040 in CDBG funds are allocated for administration (exclusive of Planning and Fair Housing allocations).</p> <p>The HOME program administrative allocation provides \$258,351 in funding. This includes \$34,686. allocated from previously unobligated funds and \$223,666 in FY 2024-25 new entitlement funding. An estimated 400 persons will be assisted with Fair Housing investigations.</p>
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 400 persons will be provided with investigative Fair Housing support thru the Metro Alliance with CDBG administration funding. Other associated beneficiary data for CDBG and HOME will be reported under individual project activities.
	Location Description	City-wide
	Planned Activities	CDBG and HOME program administration, CDBG planning support, and Fair Housing program activities.

Table 7 Project Summaries

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 July 2023 Census Quick Facts data, The City of Oklahoma City population is estimated at 702,767 persons contained within a land area of over 620 square miles. The community is racially diverse with a total minority population exceeding 38.6%. The minority population in Oklahoma City remains in transition. In the July 2023 Census Quick Facts data, persons of Hispanic or Latino origin represent 20.1% of the total population. African American persons, formerly the largest minority/ethnic population in Oklahoma City, now comprise 13.7% 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 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 an Enterprise Community. 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.

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

Geographic Distribution

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

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

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City targets resources strategically to support neighborhood revitalization efforts in the areas with the greatest community need. The NRSA was chosen because it surrounds the center of the city and contains a large segment of the lower-income population who need residential assistance and homes that may have lead-based paint. The NRSA received its designation in part based on documented need, its geographic location encompassing much of the central city, and its concentration of lower income residents. As a result, the City of Oklahoma City will continue to focus on the NRSA as the area where most federal funds will be expended to benefit the largest numbers of lower-income residents and areas of greatest need within the community.

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

Discussion

The City of Oklahoma City strives to invest 80% of federal CDBG and HOME dollars within the NRSA, with an additional 20% allocated to projects and activities outside the NRSA boundaries. The SNI neighborhoods lie within the NRSA and are strategically targeted for reinvestment. Resources are allocated to SNI neighborhoods to the greatest extent possible. Two (2) SNI neighborhoods, Capitol View and Capitol Hill were selected during the FY 2017 Plan Year for participation in the SNI program. A third neighborhood, Metro Park, was selected to participate in the SNI program by the selection committee in March 2020. A new neighborhood, MLK Jr., was chosen to enter the SNI program on July 1, 2023, replacing Capital View.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The data in the following tables does not include any housing for the homeless; although it should be noted that ESG funds often support the addition of shelter beds. As these beds turn over frequently, it would be difficult to quantify the number of unduplicated individuals served. Non-homeless beneficiaries in the table below include DPA recipients (50) the production of new affordable units (101), whole house rehabs (10), emergency repairs (45), exterior maintenance (48) and the rehab of public housing units (12). The production of new units includes 12 units in the Village at Walnut Development (*Note: this project includes both CDBG and HOME CHDO funds and will be reported under HOME in the CAPER to avoid duplication of benefit*), two (2) additional CHDO homes, and an estimated thirty (30) units to be developed in future years under the pending HOME affordable housing solicitation. There are also 170 units in predevelopment for the Creston Park Phase I project expected to be completed in the FY 2024-25 program year. Four (4) single family homes constructed by Progress OKC, and Forty (40) units at Harmony School Apartments are nearing completion. The households listed in the special needs section include HIV/AIDS persons receiving TBRA (80) and STRMU assistance (170) thru HOPWA. Rehab of existing units includes ten (10) whole house rehabs, forty-five (45) emergency repairs, forty-eight (48) exterior maintenance repairs, and rehab of twelve (12) public housing units. Acquisition of existing units includes Fifty (50) DPA buyers.

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

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance (TBRA/STRMU)	250
The Production of New Units	101
Rehab of Existing Units	115
Acquisition of Existing Units	50
Other (Creston Park)	170
Total	686

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

Discussion

Housing assistance is being provided to the extremely low income households thru ESG funds.

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

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

Programs to Assist Homeowners:

- CDBG Emergency Home Repair Program
- CDBG Exterior Maintenance
- HOME Whole House Rehabilitation Program
- Lead-based paint abatement in conjunction with the three previous listed programs

Projected 2024-2025 Housing Accomplishments:

- Emergency home repairs
- Exterior Maintenance projects
- Whole house rehabilitation projects
- Down Payment Assistance Loans
- CHDO Homes Constructed
- Public Housing Unit Rehabs
- Persons Provided Rental and/or Utility Assistance
- Affordable Housing Development- Program projects underway

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. CDBG funds are provided in the Fifth

Action Plan Year to support the rehabilitation of approximately twelve (12) public housing units.

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

The City of Oklahoma City will continue to work with OCHA to increase the overall quality of public housing. Presently, the Housing Authority has sufficient resources to manage their properties; however, are unable to make all the needed upgrades and repairs. All housing is considered "average" by the Housing Authority. The City will provide CDBG funding for rehabilitation of approximately twelve (12) public housing units. The City is also including HOME funds in support of OCHA's Creston Park and Vita Nova projects in the Fifth Action Plan Year.

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

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

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

Not applicable. OCHA is designated as a standard performer.

Discussion

The Oklahoma City Housing Authority (OCHA) administers the City's public housing rental projects, and administers the Section 8 rental assistance voucher program. 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 Section 8 subsidy requires that an eligible tenant pay (the higher of) 30% of adjusted income or 10% of gross income as their share of the rent. Section 8 funds compensate the landlord for 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

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 in need of safe, affordable, and stable housing.

Describe the jurisdiction's one-year goals and actions for reducing and ending homelessness including reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs.

To reach unsheltered homeless individuals and families, ESG funds are used for outreach activities to connect this population with emergency shelter, housing, and/or services. Assistance is sometimes extended to non-facility based medical/mental health care if recipients of that care are unable, or unwilling to access an appropriate health facility. 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 Fifth Action Plan Year to address homelessness include the provision of HOPWA funding for Short Term Mortgage and Utility Assistance (STRMU) and Tenant Based Rental Assistance (TBRA). ESG funds continue to support housing and case management activities for families. ESG funding is also committed for rapid re-housing and prevention services for homeless households with children.

In addition to the entitlement funds, the City has engaged a new Key to Home Program. The Oklahoma Key to Home Partnership was subsequently created as a collaborative team of service providers, local government, community leaders and funders with a mission to prevent and end homelessness. As one component, the Key to Home Partnership piloted an encampment-rehousing program in 2022. This is an intentional, structured effort to offer individuals in established encampments safe and dignified housing solutions prior to closing an area or reactivating it for general use. With 90% of the participants in the pilot program moving into housing with supportive services, the program is expanding. The goal is to pair housing with wraparound services to 500 unsheltered people by 2025.

Addressing the emergency shelter and transitional housing needs of homeless persons.

In the Fifth 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 consists 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.

The City's Coordinated Entry System (CES) directs individuals and families experiencing homelessness to the appropriate services and financial assistance needed to achieve independent living. The CES allows the community to prioritize housing units for the most vulnerable while ensuring the housing is most appropriate for the individual or family's needs. The CES prioritizes based on vulnerability and length of time homeless, with the goal of decreasing the amount of time individuals and families experience homelessness. This may include assistance in obtaining permanent housing, medical treatment, mental

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

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

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

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

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 contacts the landlord or utility company immediately 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 the ability to earn sufficient income to sustain their permanent housing at the conclusion of program services.

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

Discussion

The City of Oklahoma City and local service providers use the Homeless Management Information System (HMIS) to track services provided to the homeless, and to prevent duplication of resources. Providers are required to record client demographic and program data in the community's 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 (3) days and utilize Service Point's network support and technical assistance as needed to ensure proper software usage and data integrity.

Though many outreach and shelter activities are supported by ESG and Continuum of Care funding, most funded activities prioritize housing. Services provided may 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 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	170
Tenant-based rental assistance	80
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	25
Total	275

Table 11 – HOPWA Goals

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

Introduction:

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

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

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

Discussion:

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

AP-85 Other Actions – 91.220(k)

Introduction:

The local and federal resources are insufficient to address all needs, even those of high priority. In some instances, there are perceptions in the community that affordable housing will decrease area property

values as well as facilitate other societal problems (NIMBY issues). There has been a lack of interest from service providers in developing permanent supportive housing for the chronically homeless (lack of developers). Private builders are not interested in and/or cannot produce positive cashflow from affordable units without deep financial subsidy. The City of Oklahoma City continues to encourage and prioritize mixed-income developments in which market rate units may assist in offsetting lower rents on affordable units.

Actions planned to address obstacles to meeting underserved needs.

Fair Housing Activities are funded with CDBG under General Program Administration. The services are provided by Metropolitan Fair Housing Council which investigates and reports on fair housing for the City to ensure equitable access and opportunity for all persons. Continued funding for these activities has been included in this Fifth Action Plan Year.

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

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

Actions planned to foster and maintain affordable housing.

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

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

Occasionally, if unanticipated funding becomes available, The City may release Requests for Proposals for

eligible affordable housing project proposals.

Housing rehabilitation activities are provided through Whole House Rehabilitation Program citywide with strong 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. This program has, however, been recently thwarted by a lack of contractors with certifications required to perform lead abatement activities. The amount of funds required to completely rehab some of the housing to meet housing quality standards has also been prohibitive.

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

Single Unit Rehabilitation is addressed by CDBG funding through eligible program activities that include the CAA's Emergency Home Repair program, the CDBG Home Exterior Maintenance Program, and on a targeted basis, projects within the Strong Neighborhoods Initiative areas. These programs require income qualification and environmental review compliance. In addition, CDBG funds are allocated to the Pest Inspection and Treatment Program to assist with the identification and remediation of infestation for units assisted under the Home Whole House Rehabilitation Program.

Public Housing Modernization is provided through the Oklahoma City Housing Authority (OCHA). OCHA is allocated CDBG funds to make needed repairs to approximately twelve (12) 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. 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.

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

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

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

Actions planned to reduce the number of poverty-level families.

The City does not have a formal antipoverty strategy but has implemented numerous local and federal job creation and education programs to reduce poverty. In 1993, the citizens of Oklahoma City passed the first of four Metropolitan Area Projects (MAPS) initiatives to support the construction of public facilities, infrastructure, recreational facilities, and with the most recent initiative social service support for the homeless and domestic violence victims. The total public investment from MAPS funding to date is well over \$2 billion. Projects and services supported with the MAPS initiatives improves the quality of life city-wide and serves as a catalyst to substantial private development. This in itself promotes economic development and provides opportunities for all that may not have otherwise been available. The City also uses bond funds and Tax Increment Funding (TIF) in support of economic development projects that will create jobs or increase property taxes.

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

The City will continue to provide prevention, rehousing, case management and other assistance to families and people living with HIV/AIDS as well as other eligible individuals. However, they are only a fraction of

the population paying more than a third of their income for housing.

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.

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 Community Action Agency (CAA) is funded to conduct an economic development activity with CDBG funds and the Section 108 Loan Guarantee Program. The City's ongoing economic development programs and Section 108 Loan Guarantees generally include the participation of local lenders. Partnering banks include Bank of Oklahoma, Bank of America, BankOne, BancFirst, First State Bank, Legacy Bank, Arvest, Bank 7 and InterBank (among others) to assist with the Murrah District Revitalization Program, CAA small business loan program, Current Section 108 Loans, Section 108 Small Business Fund, and Housing assistance to lower-income persons and special populations. Funding is provided through multiple community partners including OCHA, CAA, NHS, City Care, designated CHDOs, Oklahoma State Department of Commerce, and CEC.

Assisted social service agencies that assist the homeless with shelter, outreach and housing assistance through ESG, HOPWA and City of Oklahoma City general funds currently include the Homeless Alliance, Upward Transitions, the YWCA, SISU Youth, Mental Health Association of Oklahoma, Neighborhood Services Organization, Positive Tomorrows, City Care, Community Health Centers, and Pivot. These organizations also help plan and execute the annual Point In Time count with other government agencies.

The City generally receives assistance in conducting the annual Point-in-Time count from numerous parties, including 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.

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

Discussion:

In addition to the above initiatives, direct home ownership assistance is provided with HOME funds to down payment and closing cost assistance provider(s). Funding to the down payment assistance (DPA) provider(s) is prioritized to providing 80% of the funds to homebuyers in the NRSA and Targeted Areas (when practicable), and the additional 20% to homebuyers within the remainder of the DPA lending area. The Targeted Areas generally encompasses the NRSA, CHDO construction developments and other non-profit affordable housing developers and any low/mod areas specifically targeted for home ownership funding. The General DPA portion of the program includes low and moderate-income areas contained within designated program boundaries. Targeted areas have been identified both within and outside the general boundaries. Eligible areas may be found in the map attached in Appendix 5a.

HOME down payment assistance provides a loan up to \$18,000 based on need that is forgivable at the rate of 1/84th per month over a seven-year affordability period to eligible homebuyers. Due to rapidly rising interest rates during this Fifth Action Year Plan, an additional \$5,000 can now be reserved to buy down the interest rate if needed to make the loan payments affordable. When HOME funds are utilized for DPA, the maximum sales price of the home cannot exceed 95% of the area median sales price of homes in the jurisdiction. The limits are published annually by HUD and enforced in the City's DPA Program.

Program Specific Requirements

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

Introduction:

Program Income (PI)-The City does not anticipate additional CDBG PI prior to June 30, 2024. Program Income in the amount of \$94,105 was received during the Fourth Action Plan year (FY 2023-24) and is included in reallocations/redistribution to FY 2024-25 activities. An indeterminate amount of Program income is anticipated in the Fifth Action Plan Year (FY 2024-25); however, has not been used for allocation purposes in the development of this Plan. A total of \$2,850,016 in FY 2023-24 prior year CDBG funds (both obligated and unobligated) are identified in this Fifth Action Plan Year. CDBG funds capitalized a \$750,000 revolving loan fund (RLF) in 2015 which was later discontinued. One loan closed under this program. Annual RLF program income from this single RLF transaction is projected at \$5,362.32 in the Fifth Action Plan Year. Oklahoma City has not invested CDBG funds in float funded activities. PI that is received will be allocated as follows: 1) PI generated from Section 108 Loan investment and repayment accounts will be used to pay Section 108 principal and interest; 2) PI that is generated by the Oklahoma City Urban Renewal Authority (OCURA) activities during the current program year may be reallocated back to OCURA for use in other CDBG eligible activities subject to review and approval by The City and compliance with all contractual requirements for use of these funds; 3) CDBG funding rebates provided by material suppliers from Oklahoma City Housing Assistance Program activities will be allocated to the Oklahoma City Housing Assistance Program to assist with funding additional Housing Exterior Maintenance projects; 4) 20% of all CDBG PI may be used to create additional administrative capacity, and CDBG PI may be used to fund administrative expenses during the program year in which it is realized; and 5) In accordance with CPD Notice 97-9, III.J., HOME PI deposited to the PJ's letter of credit that creates additional administrative capacity may be used by the PJ for administrative expenses incurred during the Action Year, and any excess administrative capacity will be carried forward to subsequent years. Oklahoma City forecasts PI and allocates the forecasted PI in Annual Action Year Plans. All PI is reported in IDIS and in financial reporting to HUD.

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. **NOTE: Due to character limits in the HUD software system, additional information regarding the CDBG items below are continued under the HOME Investment Partnerships section immediately following.**

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed

0

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56

2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

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. 70.00%

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

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

Section 108 Proceeds-Proceeds from Section 108 Loan Guarantees have been utilized to stimulate economic development and create low and moderate-income jobs. All Section 108 Loans have been fully disbursed. The Small Business Assistance Section 108 Loan was established to provide access to capital for small businesses located in the NRSA. Proceeds from loan payments and interest earned on all loan repayment accounts associated with the Section 108 Loan Guarantees are used to make debt service payments. No Section 108 loan applications were received during the FY 2023-24 program year. **Surplus Funds**- The City of Oklahoma City received a return of \$94,105 in 2023-24 CDBG PI prior to the beginning of the Fifth Action Year Plan that had not yet been allocated. An undetermined amount of CDBG PI is projected in the Fifth Action Plan Year; however, is not used for allocation purposes at this time. A total of \$2,850,016 in FY 2023-24 unexpended CDBG funds exists from prior years, of which \$1,176,560 is obligated under previous contracts. The remainder of unobligated funding (\$1,673,456) is available for allocation. The City received a return of \$230,860 in FY 2023-24 HOME PI prior to the beginning of the Fifth Action Plan Year. A total of \$7,747,023 in unexpended FY 2023-24 HOME funds exists from prior years, of which \$2,085,226 is obligated under previous contracts. The remainder of unobligated funding (\$5,661,797) is available for allocation. **Unexpended Program Funds**- All obligated/unspent funds will carry forward to the following Action

Plan Year, and be added to the budget line of the applicable program/activity to ensure continuation of program activities between program years. **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 **Urgent Needs**-No urgent need activities are included in the Fifth Action Year Plan. **Allocation of CHDO Loan and Grant activities**- CHDO funds may be reallocated and used as either loans or grants for projects. Funds dedicated to CHDO lending may be reallocated to the CHDO set-aside activities to ensure timely allocation and efficient use of these resources in the production of affordable units. **NOTE:** In reference to item no. 2 above under the "Other CDBG Requirements" section, the City of Oklahoma City began its 3-year ratio in the Second Action Plan Year of the Consolidated Plan. The three-year period in the Fifth Action Plan Year will cover the years 2024-25; 2025-26; and 2026-27 (70% of a 3- year average beginning in FY 2024-25 as year one). This Fifth Year Action Plan is year one (1) of the 3- year ratio average. **NOTE: Pre-award Costs:** In compliance with 2 CFR 200.458, pre-award costs for both HOME and CDBG construction activities will be permissible to the extent that they would have been allowable if incurred after the date of the Federal award but before the effective date of the City contract Pre-award costs that incur before the date of the Federal award, are not approvable unless specifically approved by HUD.

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

The Homebuyer Down Payment Assistance Program (DPA) funded by Oklahoma City will utilize the Recapture Method provided in the HOME Regulations at 24 CFR 92.254(a)(5)(ii). Recapture provisions ensure that the participating jurisdiction recoups all or a portion of the HOME assistance given to a homebuyer if the housing does not continue to be the principal residence of the family for the duration of the period of affordability. If the house is to be sold, the amount subject to recapture will be prorated and dependent on the amount of time the homeowner resided in the home. The City has determined a 7-year affordability period for its DPA program, and DPA is made in the form of a forgivable loan. The affordability period will be documented and secured by a Homebuyer Agreement Deferred Note & Mortgage in favor of The City to be released at the end of the affordability period. If the home is vacated by the owner(s), whether voluntarily or involuntarily, prior to the end of the affordability period without a bona fide sale, all direct assistance provided is due and payable immediately.

The affordability period for any other HOME assistance to the homeowner will be based upon the total funds subject to recapture as described in 24 CFR 92.54(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) :

The City will recoup all or a portion of the HOME assistance provided to the homebuyers if the homeowner no longer resides in the house as his or her principal residence. If the house is to be sold,

the amount recouped will be prorated and also be subject to the availability of net proceeds. Net proceeds are here defined as the sales price minus superior loan repayment (other than for loans made with HOME funds) and minus any closing costs. The direct subsidy provided to the homebuyer, i.e., down payment and closing cost assistance and/or the difference between the fair market value of the property and a reduced sales price attributable to HOME funds, will be recouped on a pro-rata basis per the HOME regulations at 92.254(a)(5)(ii)(A)(2). The pro-rata value will be calculated based on a monthly occupancy period (i.e., for DPA, prorated at 1/84th per month of occupancy). If the combined DPA and reduction in fair market value is equal to or greater than \$15,000.00 but less than \$40,000.00 then the affordability period will be 10 years or 120 months.

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

EXAMPLE:

A homebuyer receives \$10,000 in down payment and closing costs assistance from HOME funds. The affordability period is seven (7) years or 84 months and is secured by a lien filed on the property. If the homebuyer wishes to sell the home after living there for 3 years, 3 months (i.e., 39 months), the homeowner forgiveness is 39 mo./84 mo. \times \$10,000 = \$4,643. The remaining assistance, \$10,000 - \$4,643 = \$5,357, will need to be returned to The City. If the net proceeds in the sale are less than \$5,357, all the net proceeds must be returned to the City.

Additionally, those participating in the DPA program are subject to refinancing restrictions. Requests to subordinate the City's note may be approved only if the refinancing clearly shows significant benefits such as a lower interest rate, shorter term, and provided there is no cash to borrower from equity, and The City remains in the same or better position on the mortgage. The new mortgage shall not have a loan-to-value ratio (LTV) greater than 95% and refinance fees must be reasonable and customary for the OKC market.

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

- 4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that**

will be used under 24 CFR 92.206(b), are as follows:

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

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

Home funds are not allocated to TBRA activities in the FY 2024-25 program year.

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

Home funds are not allocated to HOME TBRA activities in the FY 2024-25 program year.

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

No preferences or limitations have been imposed for rental housing projects in the FY 2024-25 program year.

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

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

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

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

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

to accessing services.

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

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

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

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

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

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

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

regarding facilities and services funded under ESG.

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

5. Describe performance standards for evaluating ESG.

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

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

The City of Oklahoma City offers a “no wrong door” approach, with providers being well linked to available resources through networking connections gained via the Coalition To End Poverty. In addition, 211 is the information and referral agency which provides information about eligibility and referrals to service agencies. 211 conducts public awareness campaigns throughout the year with public service advertisements located on television, radio, on city buses and signage. People are linked to public benefits through provider agencies. All agencies have been trained to assist people in applying for benefits through Social Security and Medicaid. Training was conducted through the SSI/SSDI Outreach, Access, and Recovery grant (SOAR). In 2013, the City of Oklahoma City joined the 100,000 Homes Campaign in an effort to move the medically frail and chronically homeless individuals into permanent housing using a housing first approach. As part of this process, members of the chronically homeless population are administered a vulnerability index survey to determine their health issues. Those determined to be the most medically frail are prioritized for immediate placement into housing. A case management committee comprised of various service providers assigns a case manager as needed. The case manager and service provider are selected and assigned based upon the needs of the individual being housed. Since joining the 100,000 Homes Campaign at the beginning of 2013, local non-profit service providers have collaborated to house over 1000 chronically homeless individuals, exceeding their goal by more than 40%.

HOPWA sponsors are selected using the following process:

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

Plan and the Annual Action Plan. All applications that meet minimum threshold requirements are presented to the Continuum of Care (CoC) Board where each is scored and ranked.

Discussion:

The Oklahoma City Continuum of Care (CoC) and ESG Written Standards are attached as Appendix 8 in the complete public copy of the report provided in the unique appendices section (AD-26).